### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	) Chapter 11
In re:	)
	) Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)
	) (Formerly Jointly Administered under
Wind-Down Debtor.	) Lead Case IEH Auto Parts Holding LLC,
	) Case No. 23-90054)
	)

### WIND-DOWN DEBTOR'S WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR MAY 27, 2025, AT 10:00 AM (PREVAILING CENTRAL TIME)

The above-captioned wind-down debtor (the "Wind-Down Debtor") files its Witness and Exhibit List for the hearing to be held on May 27, 2025, at 10:00 AM (prevailing Central Time) (the "Hearing") as follows:

### **WITNESSES**

The Debtors may call the following witnesses at the Hearing:

- Susanne Edwards, Assistant Vice President of Finance for Wind-Down Debtor IEH Auto Parts, LLC;
- 2. Mark Berger, Managing Director of Portage Point Partners, LLC;
- 3. Any witness listed or called by any other party;
- 4. Rebuttal witnesses as necessary; and
- 5. The Debtors reserves the right to cross examine any witness called by any other party.

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

### **EXHIBITS**

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
1.	Declaration of Mark Berger in Support of the Wind-Down Debtors' Fifth Omnibus Objection to Certain Proofs of Claim (Reduced, Reduced and Reclassified, Satisfied, Duplicate and Untimely Claims) [Docket No. 32, Exhibit A]						
2.	Declaration of Susanne Edwards in Support of Wind-Down Debtor's Amended Sixth Omnibus Objection to Certain Proofs of Claim (Assumed Contract Claims, Untimely Claims, No Liability Claims, and Satisfied Claims) [Docket No. 308, Exhibit A]						
3.	Declaration of Susanne Edwards in Support of Wind-Down Debtor's Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims, Duplicate Claim, and Partially Satisfied Claims) [Docket No. 274, Exhibit A]						
4.	Declaration of Susanne Edwards in Support of Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 344 Filed by "Euler Hermes Agent for Agility Auto Parts Inc. (CLUS007792)" [Docket No. 270, Exhibit A]						
5.	Certificate of Service [Docket No. 49]						
6.	Certificate of Service [Docket No. 310]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
7.	Certificate of Service [Docket No. 313]						
	Any document or pleading filed in the above-captioned main cases						
	Any exhibit necessary for impeachment and/or rebuttal purposes						
	Any exhibit identified or offered by any other party						

### **RESERVATION OF RIGHTS**

The Wind-Down Debtor reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing. Houston, Texas

Dated: May 23, 2025

#### /s/ Emily Meraia

### JACKSON WALKER LLP

Matthew D. Cavenaugh (TX Bar No. 24062656) Veronica A. Polnick (TX Bar No. 24079148) Zachary McKay (TX Bar No 24073600) Emily Meraia (TX Bar No. 24129307) 1401 McKinney Street, Suite 1900 Houston, TX 77010

Telephone: (713) 752-4200 Facsimile: (713) 752-4221

Email: mcavenaugh@jw.com

vpolnick@jw.com zmckay@jw.com emeraia@jw.com

Counsel to the Wind-Down Debtor

### **Certificate of Service**

I certify that, on May 23, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Emily Meraia

Emily Meraia

### Exhibit A

**Berger Declaration** 

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	Chapter 11
In re:	)	
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

# DECLARATION OF MARK BERGER IN SUPPORT OF THE WIND-DOWN DEBTORS' FIFTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (REDUCED, REDUCED AND RECLASSIFIED, SATISFIED, DUPLICATE AND UNTIMELY CLAIMS)

- I, Mark Berger, hereby declare that the following is true to the best of my knowledge, information, and belief:
- 1. I am a Managing Director of Portage Point Partners, LLC ("<u>Portage Point</u>"), a business advisory services firm retained by the above-captioned debtors (collectively, the "<u>Debtors</u>" as applicable, and after the effective date of their plan, the "<u>Wind-Down Debtors</u>") to serve as their restructuring advisor in these chapter 11 cases.
- 2. In my role as Managing Director at Debtors' restructuring advisor, I became familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and accounting software that reflects, among other things, the Debtors' liabilities. I have read the Wind-Down Debtors' Fifth Omnibus Objection to Certain Proofs of Claim (Reduced, Reduced and

<sup>&</sup>lt;sup>1</sup> The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

Reclassified, Satisfied, Duplicate, and Untimely Claims) (the "Objection")<sup>2</sup> and I have reviewed the related schedules.

3. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the objected claims, the Reviewing Parties reviewed the Wind-Down Debtors' books and records and the relevant proofs of claim, as well as the supporting documentation provided by each claimant, and determined that each objected claim should be disallowed or modified. As such, I believe that the disallowance or modification of the objected claims on the terms set forth in the Objection is appropriate.

#### I. Reduced Claims

4. To the best of my knowledge information, and belief, in evaluation each Reduced Claim, the Reviewing Parties have thoroughly reviewed the Wind-Down Debtors books and records along with each Reduced Claim and any documents filed in support therewith, and have determined that each Reduced Claim must be modified and reduced as set forth on **Schedule 1** to the Order. Specifically, as detailed in **Schedule 1** to the Order, each Reduced Claim was either (i) certain of the Reduced Claims assert administrative claims have already been partially paid; (ii) certain of the Reduced Claims are subject to certain credits which reduces any administrative claim held by the claimant; or (iii) certain of the Reduced Claims assert a claim that seems to be incorrectly calculated based on the supporting documentation and Wind-Down Debtors books and records. The Reduced Claims should be modified as requested because the Wind-Down Debtors believe that the correct amounts of the Reduced Claims are reflected in the "Modified Claim" column of **Schedule 1**.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

#### II. Reduced and Reclassified Claims

5. The Reclassified Claims should be reclassified as provided in <u>Schedule 2</u> partially or in their entirety because the asserted priority or priority amount related to such claims is not reflected in the supporting documentation provided in the proof of claim, is not reflected in the Wind-Down Debtors' books and records and/or is not supported under the Bankruptcy Code, or is inconsistent with such claim's treatment under the confirmed Plan. The failure to modify and reclassify the Reduced and Reclassified Claims could result in the applicable claimants receiving an improper recovery on account of such claims to the detriment of other similarly situated creditors. As such, I believe that the modification of the Reduced and Reclassified Claims on the terms set forth in the Objection and **Schedule 2** is appropriate.

#### **III.** Satisfied Claims

6. To the best of my knowledge, information, and belief, the Reviewing Parties have thoroughly reviewed the Wind-Down Debtors' books and records along with the Satisfied Claims, and have determined that the Satisfied Claims identified on **Schedule 3** to the Order were satisfied or released during these chapter 11 cases in accordance with the Bankruptcy Code, any applicable rules, or a Court Order. As further identified on **Schedule 3** to the Order, the Satisfied Claims were satisfied or released during these chapter 11 cases in accordance with a Court order. Failure to disallow the Satisfied Claims could result in the relevant claimants receiving an unwarranted recovery against the Wind-Down Debtors to the detriment of other similarly situated creditors. As such, I believe that the disallowance of the Satisfied Claims on the terms set forth both in the Objection and **Schedule 3** is appropriate.

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**IV.** Duplicate Claims

7. The Reviewing Parties have determined that each Duplicate Claim identified on

Schedule 4 of the Order under "Claim To Be Disallowed" is duplicative of other proofs of claim—

the "Remaining Claim" identified on Schedule 4 of the Order—filed by or on behalf of the same

claimant with respect to the same liabilities. Failure to disallow the Duplicate Claims could

potentially result in the relevant claimant receiving an unwarranted recovery against the

Wind-Down Debtors to the detriment of other creditors. As such, I believe that disallowance of

the Duplicate Claims, on the terms set forth both in the Objection and **Schedule 4**, is appropriate.

V. Untimely Claims

8. To the best of my knowledge, information, and belief, the Reviewing Parties have

thoroughly reviewed the Wind-Down Debtors' books and records and the claims register and have

determined that each Untimely Claim listed on Schedule 5 to the Order was filed after the Bar

Date. Failure to disallow and expunge the Untimely Claims could potentially result in the relevant

claimant receiving an unwarranted recovery against the Wind-Down Debtors to the detriment of

other creditors. As such, I believe that disallowance of the Untimely Claims on the terms set forth

in the Objection and **Schedule 5** is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in

the foregoing declaration are true and correct to the best of my knowledge, information and believe

as of the date hereof.

Dated: March 8, 2024

/s/ Mark Berger

Mark Berger

Portage Point Partners, LLC

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	Chapter 11
In re:	)	
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

# DECLARATION OF SUSANNE EDWARDS IN SUPPORT OF THE WIND-DOWN DEBTOR'S AMENDED SIXTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (ASSUMED CONTRACT CLAIMS, UNTIMELY CLAIMS, NO LIABILITY CLAIMS, AND SATISFIED CLAIMS)

- I, Susanne Edwards, hereby declare that the following is true to the best of my knowledge, information, and belief:
- 1. I was an Assistant Vice President of Finance for Debtor IEH Auto Parts, LLC prior to the Debtors' wind down pursuant to these chapter 11 cases. I have been retained by the Wind-Down Debtor to assist with the claims reconciliation process. I have more than 25 years of experience as a certified public accountant.
- 2. In my role as Assistant Vice President of Finance, I became familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and accounting software that reflects, among other things, the Debtors' liabilities. I have read the Wind-Down Debtor's Amended Sixth Omnibus Objection to Certain Proofs of Claim (Assigned Contract Claims,

<sup>&</sup>lt;sup>1</sup> The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

Untimely Claims, No Liability Claims, and Satisfied Claims) (the "Objection")<sup>2</sup> and I have reviewed the related schedules.

3. I believe that the assertions made in the Objection are accurate. I reviewed the claims register, the relevant proofs of claim, as well as any supporting documentation provided by each claimant, if applicable, and the Wind-Down Debtor's books and records and determined that each Objected Claim should be disallowed and treated as specified in the Objection and on the schedules to the Objection.

#### I. Assigned Contract Claims

4. I believe that the Assigned Contract Claims have been satisfied or released during these chapter 11 cases as identified on <u>Schedule 1</u> to the Order. I understand that the agreements underlying the Assigned Contract Claims were assumed and assigned by the Wind-Down Debtors. The Wind-Down Debtors paid the cure amounts associated with the Assigned Contract Claims, and I do not believe that the Wind-Down Debtor has any other liability on account of the Assigned Contract Claims. I believe that disallowance of the Assigned Contract Claims on the terms set forth in the Objection and <u>Schedule 1</u> to the Order is appropriate.

#### II. Untimely Claims

5. I believe that each Untimely Claim listed on <u>Schedule 2</u> to the Order was filed after the applicable Bar Date based on the information in the Bar Date Order and the dates that the respective Untimely Claims were filed. I believe that the disallowance of the Untimely Claims on the terms set forth in the Objection and <u>Schedule 2</u> to the Order is appropriate.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

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**III.** No Liability Claims

6. I have reviewed the Wind-Down Debtors' books and records, the claims register,

the No Liability Claims, any attached supporting documentation and have determined that the

Wind-Down Debtor is not liable for the amounts asserted in the No Liability Claims. Specifically,

the No Liability Claims assert amounts that are either not supported by the Wind-Down Debtors'

books and records or asserts an administrative amount which is completely offset by a credit owed

to the Wind-Down Debtor by the claimant. Accordingly, I believe that No Liability Claims assert

amounts for which the Wind-Down Debtor is not liable. I believe that the disallowance of the No

Liability Claims on the terms set forth in the Objection and Schedule 3 to the Order is appropriate

IV. Satisfied Claims

7. The Satisfied Claims identified on **Schedule 4** to the Order were satisfied during

these chapter 11 cases. I have reviewed the Wind-Down Debtors' books and records, the claims

register, the Satisfied Claims, any attached supporting documentation, and believe the Wind-Down

Debtor paid the obligations asserted in the Satisfied Claims as specified on Schedule 4. I do not

believe that the Wind-Down Debtor has any outstanding obligations with respect to the Satisfied

Claims. I believe the Wind-Down Debtor is no longer liable for the Satisfied Claims and that

disallowance of the Satisfied Claims on the terms set forth in the Objection and Schedule 4 to the

Order is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in

the foregoing declaration are true and correct to the best of my knowledge, information and believe

as of the date hereof.

Dated: March 14, 2025

/s/ Susanne Edwards

Susanne Edwards

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	Chapter 11
In re:	)	
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC, <sup>1</sup>	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

# DECLARATION OF SUSANNE EDWARDS IN SUPPORT OF THE WIND-DOWN DEBTOR'S SEVENTH OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (AMENDED CLAIMS, RECLASSIFIED CLAIMS, DUPLICATE CLAIM, AND PARTIALLY SATISFIED CLAIMS)

- I, Susanne Edwards, hereby declare that the following is true to the best of my knowledge, information, and belief:
- 1. I was an Assistant Vice President of Finance for Debtor IEH Auto Parts, LLC prior to the Debtors' wind down pursuant to these chapter 11 cases. I have been retained by the Wind-Down Debtor to assist with the claims reconciliation process. I have more than 25 years of experience as a certified public accountant.
- 2. In my role as Assistant Vice President of Finance, I became familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and accounting software that reflects, among other things, the Debtors' liabilities. I have read the Wind-Down Debtor's Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims,

<sup>&</sup>lt;sup>1</sup> The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

Duplicate Claim, and Partially Satisfied Claims) (the "Objection")<sup>2</sup> and I have reviewed the related schedules.

3. I believe that the assertions made in the Objection are accurate. In evaluating the Objected Claims, the Reviewing Parties reviewed the Wind-Down Debtors' books and records and the relevant proofs of claim, as well as the supporting documentation provided by each claimant, and determined that each Objected Claim should be disallowed or modified. As such, I believe that the disallowance or modification of the Objected Claims on the terms set forth in the Objection is appropriate.

#### I. Amended Claims

4. Each Amended Claim was amended and replaced by the proof of claim identified in the row titled "Remaining Claims" identified on <u>Schedule 1</u> to the Order. I do not believe that the Wind-Down Debtor, the Debtors, or their estates are liable for both the Amended Claims and the Remaining Amended Claims. I believe that disallowing the Amended Claims will prevent those claimants from receiving multiple recoveries on a single claim. I believe that the disallowance of the Amended Claims on the terms set forth in the Objection and in <u>Schedule 1</u> is appropriate.

#### II. Reclassified Claims

5. Each Reclassified Claim listed on <u>Schedule 2</u> to the Order does not accurately reflect the correct classification or priority under the Bankruptcy Code and the Wind-Down Debtor does not believe it is liable for the Reclassified Claims as currently filed. I do not believe that the Reclassified Claims are entitled to the asserted classification or priority as detailed in the Objection and the column "Reason for Modification" on <u>Schedule 2</u> to the Order.

 $<sup>^2</sup>$  Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

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6. The Reclassified Claims should be modified and reclassified as set forth in the

"Modified Claim" column on Schedule 2. As such, I believe that the reclassification of each

Reclassified Claim on the terms set forth in the Objection and **Schedule 2** is appropriate.

**III.** Duplicate Claim

7. The Duplicative Claim substantively duplicates another proof of claim identified as

the "Remaining Claim" on Schedule 3 to the Order, filed on behalf of the same claimant with

respect to the same liabilities. I believe that the disallowance of the Duplicate Claim on the terms

set forth in the Objection and **Schedule 3** to the Order is appropriate as the claimant that filed the

Duplicative Claim is not entitled to payment on both claims.

**IV.** Partially Satisfied Claims

8. To the best of my knowledge, information, and belief, the Reviewing Parties

determined that the Partially Satisfied Claims listed on Schedule 4 to the Order was partially paid

during these chapter 11 cases in accordance with the Bankruptcy Code, any applicable rules, a

Court order, or in the ordinary course of business on the date and in the manner set forth on

**Schedule 4**. Failure to reduce the Partially Satisfied Claims could result in a greater than 100%

recovery on account of the Partially Satisfied Claims. As such, I believe that the reduction of the

Partially Satisfied Claims on the terms set forth in the Objection and **Schedule 4** is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in

the foregoing declaration are true and correct to the best of my knowledge, information and believe

as of the date hereof.

Dated: February 28, 2025

/s/ Susanne Edwards

Susanne Edwards

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	Chapter 11
In re:	)	
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

### DECLARATION OF SUSANNE EDWARDS IN SUPPORT OF WIND-DOWN DEBTOR'S OBJECTION TO THE NON-GUC PORTION OF PROOF OF CLAIM NO. 344 FILED BY "EULER HERMES AGENT FOR AGILITY AUTO PARTS INC. (CLUS007792)"

- I, Susanne Edwards, hereby declare that the following is true to the best of my knowledge, information, and belief:
- 1. I was an Assistant Vice President of Finance for Debtor IEH Auto Parts, LLC prior to the Debtors' wind down pursuant to these chapter 11 cases. I have been retained by the Wind-Down Debtor to assist with the Non-GUC Claim reconciliation process. I have more than 25 years of experience as a certified public accountant.
- 2. In my role as Assistant Vice President of Finance, I became familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and accounting software that reflects, among other things, the Debtors' liabilities. I have read the *Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 411 Filed by "Euler Hermes agent for AGILITY AUTO PARTS INC. (CLUS007792)"* (the "Objection")<sup>2</sup> and I have reviewed the Objected Claim and related exhibits.

<sup>&</sup>lt;sup>1</sup> The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

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3. I believe the assertions made in the Objection are accurate. I reviewed the claims

register, the Objected Claim, as well as any supporting documentation provided by the claimant

and the Wind-Down Debtor's books and records and determined that the Objected Claim should

be disallowed in part, and allowed in part, as requested in the Objection.

Euler Hermes filed proof of claim No. 344 on April 12, 2023, on behalf of "Euler

Hermes agent for AGILITY AUTO PARTS INC. (CLUS007792)" as a partially administrative

claim. The administrative portion of the claim asserts a 503(b)(9) claim for the value of goods

received in the 20 days prior to the bankruptcy filing, totaling \$182,039.44. The claim does not

amend or modify any other claim. The claim amount is not supported by the Debtor's books and

records. However, Agility Auto Parts Inc. filed proof of claim No. 135 on March 16, 2023,

claiming a partially administrative claim of \$96,272.70. The claim Euler Hermes filed is

duplicative of claim No. 135 filed by Agility Auto Parts. Claim No. 135 was paid in full last year.

The check number is 1027028. It was paid on 11/29/203 and cleared on 12/5/23. The check was

sent to Agility Auto Parts, 3000 E. Pioneer Parkway, Ste. 160, Arlington, TX 76010.

5. After a further reconciliation, I found that an amount attributable to value of goods

received by the debtor in the 20-day 503(b)(9) window, in excess of what was already paid to

Agility, is \$14,749.68. So I believe that \$167,289.76 is not owed based on amounts already paid

to Agility and the Debtors books and records, and \$14,749.68 is owed.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set

forth in the foregoing declaration are true and correct to the best of my knowledge, information

and believe as of the date hereof.

Dated: February 28, 2025

4.

/s/ Susanne Edwards

Susanne Edwards

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### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	_ \
In re:	) Chapter 11
AUTO PLUS AUTO SALES LLC,1	) Case No. 23-90055 (CML)
Wind-Down Debtor.	<ul> <li>(Formerly Jointly Administered under Lead</li> <li>Case IEH Auto Parts Holding LLC, Case No. 23-90054)</li> </ul>
	) 23-70034)

### **CERTIFICATE OF SERVICE**

I, Marrium Zubair, depose and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Wind-Down Debtor in the above-captioned case.

On March 8, 2024, employees of KCC caused the following document to be served via Electronic Mail upon the service lists attached hereto as  $\underline{Exhibit A}$  and  $\underline{Exhibit B}$ ; and via First Class Mail upon the service lists attached hereto as  $\underline{Exhibit C}$  and  $\underline{Exhibit D}$ :

• Wind Down Debtors' Fifth Omnibus Objection to Certain Proofs of Administrative Claim (Reduced, Reduced and Reclassified, Satisfied, Duplicate, and Untimely Claims) [Docket No. 32]

Dated: March 25, 2024

/s/ Marrium Zubair Marrium Zubair KCC 222 N Pacific Coast Highway,

El Segundo, CA 90245 Tel 310.823.9000

3rd Floor

<sup>&</sup>lt;sup>1</sup> The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

### Exhibit A

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Exhibit A Master Service List Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
			plopez@abernathy-law.com;
			bankruptcy@abernathy-law.com;
Attorneys for Collin County		Paul M. Lopez, Larry R. Boyd &	lboyd@abernathy-law.com;
Tax Assessor/Collector	Abernathy, Roeder, Boyd & Hullett, P.C.	Emily M. Hahn	ehahn@abernathy-law.com
Counsel to Bank of America, N.A.	Alston & Bird LLP	Jacob A. Johnson	jacob.johnson@alston.com
Attorneys For The Texas Comptroller Of Public			
Accounts	Attorney General's Office	Bankruptcy & Collections Div.	courtney.hull@oag.texas.gov
		Tobey M. Daluz, Esquire and	daluzt@ballardspahr.com;
Counsel to the Chemours Company FC, LLC	Ballard Spahr LLP	Margaret A. Vesper, Esquire	vesperm@ballardspahr.com
Counsel to RPT Hialeah I, LLC	Barbee & Gehrt, L.L.P.	Jennifer A. Gehrt	jgehrt@bglaw.net
Counsel to National Realty & Development			
Corp.	Barclay Damon LLP	Scott L. Fleischer	sfleischer@barclaydamon.com
Counsel to Oracle America, Inc.	Buchalter, A Professional Corporation	Shawn M. Christianson, Esq.	schristianson@buchalter.com
Counsel for Epicor Software Corporation &	OLANDER DI O	D	DD
Fidelity and Deposit Company of Maryland Connecticut Attorney General	Clark Hill PLC	Duane J. Brescia	DBrescia@clarkhill.com
Delaware Attorney General	Connecticut Attorney General  Delaware Attorney General	Attn Bankruptcy Department	attorney.general@ct.gov attorney.general@state.de.us
Delaware Altorney General	Delaware Altorney General	Attn Bankruptcy Department	
			jdreher@downeybrand.com; mfrazier@downeybrand.com;
Counsel to PW Fund B, LP ("PW Fund")	Downey Brand LLP	Jamie P. Dreher	courtfilings@downeybrand.com
Counsel to Disney Road Associates, LLC and	Downey Brand LLF	Jamle F. Dienei	courtillings@downeybrand.com
Fisherbroyles	Fisherbroyles, LLP	Lisa A. Powell	lisa nowell@fisherbrovles.com
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	lisa.powell@fisherbroyles.com citizenservices@myfloridalegal.com
Counsel to Parts Authority, LLC, Clutch	Tionaa Attorney General	Aut Dankiuptoy Department	onizonaci vioca@mynonualegal.com
Acquisition, LLC, and KPAE Holdco Inc.	Foley & Lardner LLP	Michael Small	msmall@foley.com
Augustion, LLO, and NEAE Floided IIIC.	I diey & Laiuliei LLi	IVIIGIACI OITIAII	moman@ioley.com
Counsel to Environmental Management, Inc.	Foley & Lardner LLP	Stephen A. Jones	sajones@foley.com
Counsel to RIDC of Southwestern PA	Fox Rothschild LLP	John R. Gotaskie, Jr.	jgotaskie@foxrothschild.com
Counsel to Standard 5601, LLC, Standard	I OX ROUBOING LLI	John IV. Goldskie, Jr.	Jgotaonio@ioxionisoriiia.com
17600, LLC, Standard 2930, LLC, Standard			
12100, LLC, Standard 4204, LLC and CCLR,			
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### Exhibit B

### Coss 22-390055 Document 390-5 File thir XXB Boo 03/2/2/2/25 Page 7 of 122 Exhibit B

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### **Exhibit C**

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Minnesota Attorney General	Minnesota Attorney General	Attn Bankruptcy Department	445 Minnesota St Suite 1400		St Paul	MN	55101-2131
Mississippi Attorney General	Mississippi Attorney General	Attn Bankruptcy Department	Walter Sillers Building	550 High St Ste 1200	Jackson	MS	39201
						MO	65101
Missouri Attorney General	Missouri Attorney General	Attn Bankruptcy Department	Supreme Court Bldg	207 W. High St.	Jefferson City		
New Hampshire Attorney General	New Hampshire Attorney General	Attn Bankruptcy Department	33 Capitol St.		Concord	NH	03301
New Jersey Attorney General	New Jersey Attorney General	Attn Bankruptcy Department	Richard J. Hughes Justice Complex		PO Box 080 Trenton	NJ	08625-0080
New York Attorney General	New York Attorney General	Attn Bankruptcy Department	Office of the Attorney General	The Capitol, 2nd Fl.	Albany	NY	12224-0341
North Carolina Attorney General	North Carolina Attorney General	Attn Bankruptcy Department	9001 Mail Service Center		Raleigh	NC	27699-9001
Ohio Attorney General	Ohio Attorney General	Attn Bankruptcy Department	30 E. Broad St. 14th FI		Columbus	OH	43215-0410
Oklahoma Attorney General	Oklahoma Attorney General	Attn Bankruptcy Department	313 NE 21st St		Oklahoma City	OK	73105
Pennsylvania Attorney General	Pennsylvania Attorney General	Attn Bankruptcy Department	16th Floor, Strawberry Square		Harrisburg	PA	17120
Counsel to Parts Authority, LLC, KPAE	i cinicyrrama / memey ceneral	John F. Higgins, Heather K. Hatfield	rourrison, suampony square			1	20
Holdco, Inc. and Clutch Acquisition LLC	Porter Hedges LLP	Jamie L. Godsey	1000 Main Street, 36th Floor		Houston	TX	77002
Counsel to Cl478 Lombardy LLC; BGT	I Offer Fledges LLI	Jaillie L. Godsey	1000 Maiii Street, Sotii i 100i		Houston	17	11002
Lombardy LLC; Hopewood Lombardy LLC;			1000 1 511 01 1011				
Stammer Lombardy LLC; and MMP Lombardy			1900 Avenue of the Stars, 19th				
LLC	Raines Feldman Littrell LLP	Hamid R. Rafatjoo	Floor		Los Angeles	CA	90067
Rhode Island Attorney General	Rhode Island Attorney General	Attn Bankruptcy Department	150 S. Main St.		Providence	RI	02903
			801 Cherry Street, Suite 1900, Unit				
SEC Regional Office	Securities & Exchange Commission	Fort Worth Regional Office	18		Fort Worth	TX	76102
Securities and Exchange Commission	Ĭ	Ŭ					
Headquarters	Securities and Exchange Commission	Attn General Counsel	100 F St NE		Washington	DC	20549
	2332.1835 and Exchange Commission	, Conordi Codilisci			· vasilington	- 55	_0010
							1
Councel to the Propotition Lander 9 Coursel		Stophon E. Hooder 9 Anthony D					
Counsel to the Prepetition Lender & Counsel to American Entertainment Properties Corp.	Sidley Austin LLP	Stephen E. Hessler & Anthony R. Grossi	787 Seventh Avenue		New York	NY	10019

### Cass 22-3900555 D Document 1395-5 Filible thi IT X & B B to 103/2/2/2/4 5 P & Bagg 4.10 fo 122 Exhibit c

### Exhibit C Master Service List Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Counsel to the Proposed DIP Lender &								
Counsel to American Entertainment Properties		Stephen E. Hessler & Anthony R.						
Corp.	Sidley Austin LLP	Grossi	787 Seventh Avenue			New York	NY	10019
South Carolina Attorney General	South Carolina Attorney General	Attn Bankruptcy Department	Rembert C. Dennis Office Bldg.	1000 Assembly St Room 519		Columbia	SC	29201
Counsel for WJH Real Estate, LLC	Spotts Fain PC	Neil E. McCullagh	411 East Franklin Street, Suite 600			Richmond	VA	23219
Official Committee of Unsecured Creditors	Standard Motor Products	c/o Darcey Keene	1801 Waters Ridge Dr.			Lewisville	TX	75057
Tennessee Attorney General	Tennessee Attorney General	Attn Bankruptcy Department	425 5th Avenue North			Nashville	TN	37243
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	300 W. 15th St			Austin	TX	78701
	Texas Commission on Environmental							
Texas State EPA Agency	Quality	Office of the Commissioner	12100 Park 35 Circle			Austin	TX	78753
Secretary of the State	Texas Secretary of State	Attn Corporate Bankruptcy Dept	PO Box 13697			Austin	TX	78711-3697
United States Attorney Office for the Southern	US Attorney Office, Southern District of							
District of Texas	Texas	Daniel D. Hu	1000 Louisiana, Suite 2300			Houston	TX	77002
US Customs and Border Protection	US Customs and Border Protection		1300 Pennsylvania Ave. NW			Washington	DC	20229
Environmental Protection Agency (US)	US Environmental Protection Agency		1200 Pennsylvania Ave NW	Ariel Rios Building		Washington	DC	20004
Virginia Attorney General	Virginia Attorney General	Attn Bankruptcy Department	202 North Ninth St			Richmond	VA	23219
West Virginia Attorney General	West Virginia Attorney General	Attn Bankruptcy Department	State Capitol Bldg 1 Rm E-26	1900 Kanawha Blvd., East		Charleston	WV	25305
					PO Box			
Wisconsin Attorney General	Wisconsin Attorney General	Attn Bankruptcy Department	Wisconsin Dept. of Justice	114 East, State Capitol	7857	Madison	WI	53707-7857

### **Exhibit D**

### 

#### Fifth Omibus Claimaints Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
AccuSourceHR	Nicole Waters	11811 N. Tatum Blvd, Suite 3090			Phoenix	ΑZ	85028	
ACE UNIFORM SERVICES, INC.	TERRY KETCHUM	1800 PARKMAN AVE			BALTIMORE	MD	21230	
BASF Corporation	Peter Argiriou	100 Park Avenue			Florham Park	NJ	07932	
BASF CORPORATION		100 PARK AVE			FLORHAM PARK	NJ	07932	
BBB Industries, LLC	John J. Hall	600 Washington Avenue, Ste. 2500			Saint Louis	МО	63101	
BBB Industries, LLC	Steven B. Mesarick	29627 Renaissance Blvd.			Daphne	AL	36526	
BECK CHEVROLET CO INC	RUSSELL S. GELLER	561 CENTRAL PARK AVE			YONKERS	NY	10704	
Blaster Corporation	Cavitch Familo and Durkin	Michael C. Cohan	1300 E 9th St , 20th Floor		Cleveland	ОН	44114	
Blaster Corporation		8500 Sweet Valley Drive			Valley View	ОН	44125	
BorgWarner Propulsion Systems LLC	BorgWarner Propulsion Systems LLC RU131	PO Box 640780			Pittsburgh	PA	15264-0780	
BorgWarner Propulsion Systems LLC	c/o Dennis Loughlin	Warner Norcross & Judd LLP	2715 Woodward Avenue, Suite 300		Detroit	MI	48201	
BP Lubricants USA Inc	3	1500 Valley Road	,		Wayne	NJ	07470	
Carelon Behavioral Health	Tara Givens	5800 Northampton Blvd			Norfolk	VA	23502	
Carelon Behavioral Health		P.O. Box 534367			Atlanta	GA	30353-4367	
Champion Laboratories, Inc.		127 Public Square, Suite 5300			Cleveland	ОН	44114	
Champion Laboratories, Inc.		PO Box 208849			Dallas	TX	75320	
CRC Industries, Inc.	CRC Industries Inc	PO Box 8500, LBX 6150			Philadelphia	PA	19178-6150	
CRC Industries, Inc.	Marybeth Storjohann	800 Enterprise Rd Suite 101			Horsham	PA	19044	
CWD, LLC (dba Centric Parts)	Wai your Gorjonann	127 Public Square, Suite 5300			Cleveland	OH	44114	
CWD, LLC (dba Centric Parts)		PO Box 200459			Dallas	TX	75320	
Denso International	Max J. Newman	201 West Big Beaver, Ste. 1200			Trov	MI	48084	
Denso Products and Services Americas. Inc.	Max Newman	201 West Big Beaver, Ste. 1200			Troy	MI	48084	
Dun and Bradstreet	IVIAX INEWITIATI	3501 Corporate Parkway			Center Valley	PA	18034-0520	
Dun and Bradstreet		Accounts Receivable	PO Box 931197		Atlanta	GA	31193-1197	
Ferrellgas dba Dubbens Bros		One Liberty Plaza MD 40	FO BOX 931197		Liberty	MO	64068	
Gabrielle Truck Sales	GABRIELLI TRUCK SALES	-			PITTSBURGH	PA	15251-5137	
Gabrielle Truck Sales Gabrielle Truck Sales		PO BOX 358137 153-20 South Conduit Ave			Queens	NY	11434	
GK INDUSTRIES LTD.	Stanley Hertel Asst. Controller	4435 NORTH SERVICE ROAD BLDG B			BURLINGTON	ON	L7L 4X7	CANADA
	A 7 A4					PA		CANADA
GranTurk Equipment Co, Inc	Anita Moyer	One Schuylkill Parkway			Bridgeport		19405	
HH-Cloyes, Inc	Troy Angst	7800 Ball Road	0504 1111 104 4 0 11 4000		Fort Smith	AR	72908	
IAP, Inc. and IAP West, Inc.	Debbie Green	McDermott Will Emery LLP	2501 N Harwood Street, Suite 1900		Dallas	TX	75201	
IAP, Inc. and IAP West, Inc.	John R. Kelley	20036 Via Baron			Rancho Dominguez	CA	90220	
Kimberly Clark	Greg Davies	400 Goodys Lane			Knoxville	TN	37922	
Kimberly Clark		PO Box 915003			Dallas	TX	75391-5003	
KYB Americas Corporation	Lance Clark	2625 North Morton St.			Franklin	IN	46131	
MEDFORD HEATING	JILL FOULK	188 ROUTE 70			MEDFORD	NJ	08055	
MEDFORD HEATING		188 ROUTE 70			MEDFORD	NJ	08055	
Parts Authority, LLC	Lisa M. Tanzi	3 Dakota Drive Suite 110			New Hyde Park	NY	11042	
Parts Authority, LLC	Michael J. Small, Esq.	Foley and Lardner LLP	321 N. Clark Street Suite 3000		Chicago	IL	60654	
Route 23 Automall	Law Office of Drew K. Murray, LLC	Drew Murray	230 West Parkway, Suite 3		Pompton Plains	NJ	07444	
Route 23 Automall	Lorna Krumpfer	1301 NJ-23 South			Butler	NJ	07405	
Staples Technology Solutions	STS/Tom Riggleman	7 Technology Circle			Columbia	SC	29203	
Staples Technology Solutions		PO Box 95230			Chicago	IL	60694	
Suspension Specialists, Inc.		229 Brighton Ave			Allston	MA	02134	
TForce Freight		234040 Wrangler Road			Calgary	AB	T1X 0K2	Canada
The Sherwin-Williams Company	c/o Tiffany Strelow Cobb	Vorys, Sater, Seymour and Pease LLP	52 East Gay Street		Columbus	OH	43215	
Vehicle Service Group, LLC	c/o Brian J. Koenig	Koley Jessen P.C., L.L.O.	1125 South 103rd Street Suite 800		Omaha	NE	68124	
Vehicle Service Group, LLC	Katie Harris, Controller	2700 Lanier Drive			Madison	IN 	47250	
Vehicle Service Group, LLC		12758 Collections Center Drive			Chicago	IL	60693	

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	
In re:	) )	Chapter 11
AUTO PLUS AUTO SALES LLC,	)	Case No. 23-90055 (CML)
Wind-Down Debtor. <sup>1</sup>	) ) )	(Formerly Jointly Administered under Lead Case IEH Auto Parts Holding LLC, Case No. 23-90054)

### **CERTIFICATE OF SERVICE**

I, Rossmery Martinez, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the claims and noticing agent for the Wind-Down Debtor in the above-captioned case.

On February 28, 2025, employees of Verita caused the following documents to be served via Electronic Mail upon the service list attached hereto as **Exhibit A**; and, on March 1, 2025, via First Class Mail upon the service list attached hereto as **Exhibit B**:

- Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 439 Filed by Dorman Products [Docket No. 269]
- Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 344 Filed by "Euler Hermes Agent for Agility Auto Parts Inc. (CLUS007792)" [Docket No. 270]
- Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 411 Filed by Continental Battery Company [Docket No. 271]

<sup>&</sup>lt;sup>1</sup> On January 16, 2024, the Court entered a Final Decree Closing Certain of the Chapter 11 Cases [Case No. 23-90054, Dkt. No. 1043] closing each Debtor's chapter 11 case except the case of Auto Plus Auto Sales LLC. The following is a complete list of the Debtor entities in these chapter 11 cases, along with the last four digits of each entity's federal tax identification number: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Wind-Down Debtors' service address is: 5330 Caramel Crest Lane, Charlotte, NC 28226.

- Wind-Down Debtors' Objection to (1) the Non-GUC Portion of Proof of Claim No. 567 Filed by Mann + Hummel Filtration Technologies US LLC; and (2) Mann + Hummel Filtration Technologies US LLC's Motion for Allowance and Payment of Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code [Docket No. 272]
- Wind Down Debtor's Sixth Omnibus Objection to Certain Proofs of Claim (Assigned Contract Claims, Untimely Claims, No Liability Claims, and Satisfied Claims) [Docket No. 273]
- Wind Down Debtor's Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims, Duplicate Claim, and Partially Satisfied Claims) [Docket No. 274]
- Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 597 Filed by Integrated Supply Network, LLC [Docket No. 275]
- Wind Down Debtor's Eighth Omnibus Objection to Certain Proofs of Claim (Reclassified Secured Claims) [Docket No. 276]
- Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 544 Filed by Parts Authority, LLC [Docket No. 277]
- The Wind-Down Debtor's Ninth Omnibus Objection to Certain Proofs of Claim (Untimely Claim, No Liability Claims, Satisfied Claim, Duplicate Claims, Satisfied Tax Claims, Partially Satisfied Claims) [Docket No. 278]

Furthermore, on February 28, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service list attached hereto as **Exhibit C**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit D**:

• Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 439 Filed by Dorman Products [Docket No. 269]

Furthermore, on February 28, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service list attached hereto as **Exhibit E**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit F**:

Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 344
 Filed by "Euler Hermes Agent for Agility Auto Parts Inc. (CLUS007792)" [Docket No. 270]

Furthermore, on February 28, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service list attached hereto as **Exhibit G**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit H**:

• Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 411 Filed by Continental Battery Company [Docket No. 271]

Furthermore, on February 28, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service list attached hereto as **Exhibit I**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit J**:

Wind-Down Debtors' Objection to (1) the Non-GUC Portion of Proof of Claim No. 567 Filed by Mann + Hummel Filtration Technologies US LLC; and (2) Mann + Hummel Filtration Technologies US LLC's Motion for Allowance and Payment of Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code [Docket No. 272]

Furthermore, on February 28, 2025, employees of Verita caused the following documents to be served via Electronic Mail upon the service list attached hereto as **Exhibit K**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit L**:

- Wind Down Debtor's Sixth Omnibus Objection to Certain Proofs of Claim (Assigned Contract Claims, Untimely Claims, No Liability Claims, and Satisfied Claims) [Docket No. 273]
- Notice of Sixth GUC Objection [attached hereto as Exhibit W]
- Omnibus Objection Procedures [attached hereto as Exhibit X]
- Withdrawal of Proof of Claim Form [attached hereto as Exhibit Y]

Furthermore, on February 28, 2025, employees of Verita caused the following documents to be served via Electronic Mail upon the service list attached hereto as **Exhibit M**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit N**:

- Wind Down Debtor's Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims, Duplicate Claim, and Partially Satisfied Claims) [Docket No. 274]
- **Notice of Seventh GUC Objection** [attached hereto as Exhibit Z]
- Omnibus Objection Procedures [attached hereto as Exhibit X]
- Withdrawal of Proof of Claim Form [attached hereto as Exhibit Y]

Furthermore, on February 28, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service list attached hereto as **Exhibit O**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit P**:

• Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 597 Filed by Integrated Supply Network, LLC [Docket No. 275]

Furthermore, on February 28, 2025, employees of Verita caused the following documents to be served via Electronic Mail upon the service list attached hereto as **Exhibit Q**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit R**:

- Wind Down Debtor's Eighth Omnibus Objection to Certain Proofs of Claim (Reclassified Secured Claims) [Docket No. 276]
- Notice of Eighth GUC Objection [attached hereto as Exhibit AA]
- Omnibus Objection Procedures [attached hereto as Exhibit X]
- Withdrawal of Proof of Claim Form [attached hereto as Exhibit Y]

Furthermore, on February 28, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service list attached hereto as **Exhibit S**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit T**:

• Wind-Down Debtor's Objection to the Non-GUC Portion of Proof of Claim No. 544 Filed by Parts Authority, LLC [Docket No. 277]

Furthermore, on February 28, 2025, employees of Verita caused the following documents to be served via Electronic Mail upon the service list attached hereto as **Exhibit U**; and, on March 3, 2025, via First Class Mail upon the service list attached hereto as **Exhibit V**:

- The Wind-Down Debtor's Ninth Omnibus Objection to Certain Proofs of Claim (Untimely Claim, No Liability Claims, Satisfied Claim, Duplicate Claims, Satisfied Tax Claims, Partially Satisfied Claims) [Docket No. 278]
- Notice of Ninth GUC Objection [attached hereto as Exhibit AB]
- Omnibus Objection Procedures [attached hereto as Exhibit X]
- Withdrawal of Proof of Claim Form [attached hereto as Exhibit Y]

Dated: March 14, 2025

/s/ Rossmery Martinez
Rossmery Martinez
Verita
222 N Pacific Coast Highway,
3rd Floor
El Segundo, CA 90245
Tel 310.823.9000

## Exhibit A

### Case-2239900555 DDocumernt 135696 Filided in TXX5Boom 035123225 Flagge 66061880 Exhibit A

#### Master Service List Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
			plopez@abernathy-law.com;
			bankruptcy@abernathy-law.com;
Attorneys for Collin County Tax	Abernathy, Roeder, Boyd & Hullett,	Paul M. Lopez, Larry R. Boyd	lboyd@abernathy-law.com;
Assessor/Collector	P.C.	& Emily M. Hahn	ehahn@abernathy-law.com
Counsel to Bank of America, N.A.	Alston & Bird LLP	Jacob A. Johnson	jacob.johnson@alston.com
Attorneys For The Texas Comptroller Of			,,
Public Accounts	Attorney General's Office	Bankruptcy & Collections Div.	courtney.hull@oag.texas.gov
Counsel to the Chemours Company FC,		Tobey M. Daluz, Esquire and	daluzt@ballardspahr.com;
LLC	Ballard Spahr LLP	Margaret A. Vesper, Esquire	vesperm@ballardspahr.com
Counsel to RPT Hialeah I, LLC	Barbee & Gehrt, L.L.P.	Jennifer A. Gehrt	igehrt@bglaw.net
Counsel to National Realty &	,		,,,
Development Corp.	Barclay Damon LLP	Scott L. Fleischer	sfleischer@barclaydamon.com
	Buchalter, A Professional		
Counsel to Oracle America, Inc.	Corporation	Shawn M. Christianson, Esq.	schristianson@buchalter.com
Counsel for Epicor Software Corporation		, ,	
& Fidelity and Deposit Company of			
Maryland	Clark Hill PLC	Duane J. Brescia	DBrescia@clarkhill.com
,		Robert P. Franke and Audrey	bfranke@clarkhill.com;
Counsel to Continental Battery Company	Clark Hill PLC	L. Hornisher	ahornisher@clarkhill.com
Connecticut Attorney General	Connecticut Attorney General	Attn Bankruptcy Department	attorney.general@ct.gov
Attorneys for Capital Management		p, = specialist	, , , , , , , , , , , , , , , , , , , ,
Systems, LLC and EHL Holdings, LLC	Deiches & Ferschmann	A Professional Corporation	ideiches@deicheslaw.com
Delaware Attorney General	Delaware Attorney General	Attn Bankruptcy Department	attorney.general@state.de.us
			jdreher@downeybrand.com;
			mfrazier@downeybrand.com;
Counsel to PW Fund B, LP ("PW Fund")	Downey Brand LLP	Jamie P. Dreher	courtfilings@downeybrand.com
Counsel to Disney Road Associates, LLC		Carrie 1 : Broner	ocaraminge@aownoysrana.com
and Fisherbroyles	Fisherbroyles, LLP	Lisa A. Powell	lisa.powell@fisherbroyles.com
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	citizenservices@myfloridalegal.com
Counsel to Parts Authority, LLC, Clutch	Tierraa / Merriey Certeral	7 turi Bariti aptoy Boparamont	onizonooi vioco@mynonaaiogancom
Acquisition, LLC, and KPAE Holdco Inc.	Foley & Lardner LLP	Michael Small	msmall@foley.com
Counsel to Environmental Management,	r oldy a Earaner EEr	Whender email	momani@roioy.sem
Inc.	Foley & Lardner LLP	Stephen A. Jones	sajones@foley.com
Counsel to RIDC of Southwestern PA	Fox Rothschild LLP	John R. Gotaskie, Jr.	igotaskie@foxrothschild.com
Counsel to Standard 5601, LLC,	T OX TROUBORNIA EEI	COMPTE COLUCIE, CT.	jgotaskie@ioxiotiia.com
Standard 17600, LLC, Standard 2930,			
LLC, Standard 12100, LLC, Standard			
4204, LLC and CCLR, Ltd.,	Frank B. Lyon		frank@franklyon.com
Counsel to Appriss, Inc.	Frost Brown Todd LLP	A.J. Webb, Esq.	awebb@fbtlaw.com
Georgia Attorney General	Georgia Attorney General	Attn Bankruptcy Department	Agcarr@law.ga.gov
Georgia Attorney General	Georgia Attorney General	Micheal W. Bishop & Amber	mbishop@grayreed.com;
Counsel to US Pack Parts LLC	Gray Reed	M. Carson	acarson@grayreed.com
Counsel to City of Mesquite	Grimes & Linebarger, LLP	John Kendrick Turner	dallas.bankruptcy@lgbs.com
Osanson to Oity of Micoquite	Chinos & Emobargor, EEI	COMMITTED TO THE TOTAL T	kmather@gunster.com;
			tkennedy@gunster.com;
Counsel to Ranger FL, LLC	Gunster, Yoakley & Stewart, P.A.	Kenneth G.M. Mather, Esq.	eservice@gunster.com
Counsel to MDH F2 BAL Governor CT,	Hall, Estill, Hardwick, Gable,	Steven W. Soule, OBA No.	SSS. VIOOLOGIANISTOT.OOM
LLC and Ranger FL LLC	Golden & Nelson, P.C.	13781	ssoule@hallestill.com
LEO and Nanger I E LEO	Coldell & NGISOII, I .C.	Charles A. Beckham, Jr.,	charles.beckham@haynesboone.com;
		Patrick L. Hughes, David	charles.beckham@haynesboone.com;
Counsel to Fisher Auto Parts, Inc.	Haynes And Boone, Llp	Trausch	david.trausch@haynesboone.com
Official Committee of Unsecured	riayrios And Doorie, Lip	Hauson	davia.trausori@nayriesboorie.com
Creditors	Highline Warren	c/o Anestis Derakis	anestis.derakis@highlinewarren.com
Counsel for 86 Winter Street LLC	Hinckley, Allen & Snyder LLP	Jennifer V. Doran, Esq.	idoran@hinckleyallen.com
OSAMON NO WINTER OURGELELO	i money, raion & onyder LLi	E. Todd Sable & Lawrence A.	tsable@honigman.com;
Counsel for General Motors LLC	Honigman LLP	Lichtman, Esq.	llichtman@honigman.com
Counsel for Axalta Coating Systems,	riongman EEI	Lionanan, Loy.	monanan@nongman.com
LLC	Hunton Androwe Kurth LLD	Justin F. Paget	jpaget@HuntonAK.com
Counsel for Axalta Coating Systems,	Hunton Andrews Kurth LLP	Timothy A. ("Tad") Davidson II	taddavidson@HuntonAK.com;
	Hunton Androwe Kurth LLD		
Coupage to the Sefety National Coupage	Hunton Andrews Kurth LLP	& Ashley L. Harper	ashleyharper@HuntonAK.com
Comparation	Llugah Bladavall II B	Duffey E. Klain	Duffey Klein@hueehhll
Corporation	Husch Blackwell LLP	Buffey E. Klein	Buffey.Klein@huschblackwell.com
Counsel to DRIRITE Tampa	Husch Blackwell LLP	Lynn Hamilton Butler	lynn.butler@huschblackwell.com
Indiana Attorney General	Indiana Attorney General	Attn Bankruptcy Department	info@atg.in.gov

### $\textbf{Caase223990055} \ \ \, \textbf{DDocumeent336} 696 \ \ \, \textbf{Filledin} \\ \textbf{Exhibit A} \\ \textbf{TNSSB00n035123225} \ \ \, \textbf{Flagge77061880} \\ \textbf{Exhibit A} \\ \textbf{Caase2239900555} \\ \textbf{DDocumeent336} \\ \textbf{Caase2239900555} \\ \textbf{Caase2239900555} \\ \textbf{DDocumeent336} \\ \textbf{Caase2239900555} \\ \textbf{Caase239900555} \\ \textbf{Caase239900555} \\ \textbf{Caase2239900555} \\ \textbf{Caase239900555} \\ \textbf{Caase23990055} \\ \textbf{Caase2390055} \\ \textbf{Caase2390055} \\ \textbf{Caase2390055} \\ \textbf{Caase2390055} \\ \textbf{Caase239005} \\ \textbf{Caase2390055} \\ \textbf{Caase2390055} \\ \textbf{Caase2390055} \\ \textbf{Caase239005} \\ \textbf{Caase23$

#### Master Service List Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
		Centralized Insolvency	
Internal Revenue Service	Internal Revenue Service	Operation	Mimi.M.Wong@irscounsel.treas.gov
Official Committee of Unsecured			
Creditors	Interstate Batteries, Inc.	c/o Heather Catelotti	heather.catelotti@ibsa.com
Iowa Attorney General	Iowa Attorney General	Attn Bankruptcy Department	IDR.Bankruptcy@ag.iowa.gov
Counsel for Beaver Falls Municipal			
Authority for Itself and as Agent for the			
Bridgewater Township Municipal			
Authority	J. Philip Colavincenzo		jp.cola@verizon.net
	Jaspan Schlesinger Narendran		
Counsel to Cortland Squires LLC	LLP	Sophia A. Perna-Plank, Esq.	spernaplank@jaspanllp.com
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# Exhibit B

### Casse2239900555 Divocumeent 1351696 Fifted frint TXSSB on n 0 351243255 Fit age 1.11.061880 Exhibit B

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Richard J. Hughes Justice Complex 25 Market St PO Box 080 Trenton NJ 08625-0080 Office of the Attorney New York Attorney General			Attn Bankruptcy Department		207 W. High St.			
New Jersey Attorney General New Jersey Attorney General Attn Bankruptcy Department Complex 25 Market St PO Box 080 Trenton NJ 08625-0080 Office of the Attorney New York Attorney General Attn Bankruptcy Department General The Capitol, 2nd Fl. Albany NY 12224-0341	New Hampshire Attorney General	New Hampshire Attorney General	Attn Bankruptcy Department			Concord	NH	03301
New York Attorney General New York Attorney General Attn Bankruptcy Department General The Capitol, 2nd Fl. Albany NY 12224-0341				Richard J. Hughes Justice				
New York Attorney General New York Attorney General Attn Bankruptcy Department General The Capitol, 2nd Fl. Albany NY 12224-0341	New Jersey Attorney General	New Jersey Attorney General	Attn Bankruptcy Department	Complex	25 Market St	PO Box 080 Trenton	NJ	08625-0080
New York Attorney General New York Attorney General Attn Bankruptcy Department General The Capitol, 2nd Fl. Albany NY 12224-0341				Office of the Attorney				
	New York Attorney General	New York Attorney General	Attn Bankruptcy Department	General	The Capitol, 2nd Fl.	Albany	NY	12224-0341
	North Carolina Attorney General	North Carolina Attorney General	Attn Bankruptcy Department	9001 Mail Service Center		Raleigh	NC	27699-9001

### Case223990555 Dixocumeent 1351696 Fifted in in TXSSB on n 0351242255 Fragge 1.12061880 Exhibit B

#### Master Service List Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Ohio Attorney General	Ohio Attorney General	Attn Bankruptcy Department	30 E. Broad St. 14th Fl	714410002		olumbus		43215-0410
Oklahoma Attorney General	Oklahoma Attorney General	Attn Bankruptcy Department	313 NE 21st St			klahoma City	-	73105
Charletta / Mortiey Conordi	Chianoma / Morney Conoral	7 turi Barini aptoy Bopartinoni	16th Floor, Strawberry			manoma ony	UI.	70100
Pennsylvania Attorney General	Pennsylvania Attorney General	Attn Bankruptcy Department	Square		H	larrisburg	PA	17120
Counsel to Parts Authority, LLC, KPAE	· cimejirama / memej ceneral	John F. Higgins, Heather K.	9444119					20
Holdco, Inc. and Clutch Acquisition LLC	Porter Hedges LLP	Hatfield, Jamie L. Godsey	1000 Main Street, 36th Floor		Н	louston	TX	77002
Counsel to Cl478 Lombardy LLC; BGT	. e.te euges zz.	i iameia, came zi ceaee,					.,,	
Lombardy LLC; Hopewood Lombardy								
LLC; Stammer Lombardy LLC; and MMP			1900 Avenue of the Stars.					
Lombardy LLC	Raines Feldman Littrell LLP	Hamid R. Rafatioo	19th Floor		Lo	os Angeles	CA	90067
Rhode Island Attorney General	Rhode Island Attorney General	Attn Bankruptcy Department	150 S. Main St.			rovidence	RI	02903
,	Securities & Exchange	1 , 1	801 Cherry Street, Suite					
SEC Regional Office	Commission	Fort Worth Regional Office	1900, Unit 18		Fo	ort Worth	TX	76102
Securities and Exchange Commission	Securities and Exchange	J	-,		1			
Headquarters	Commission	Attn General Counsel	100 F St NE		W	/ashington	DC	20549
Counsel to the Prepetition Lender &								
Counsel to American Entertainment		Stephen E. Hessler & Anthony						
Properties Corp.	Sidley Austin LLP	R. Grossi	787 Seventh Avenue		N	lew York	NY	10019
Counsel to the Proposed DIP Lender &								
Counsel to American Entertainment		Stephen E. Hessler & Anthony						
Properties Corp.	Sidley Austin LLP	R. Grossi	787 Seventh Avenue		N	lew York	NY	10019
			Rembert C. Dennis Office	1000 Assembly St				
South Carolina Attorney General	South Carolina Attorney General	Attn Bankruptcy Department	Bldg.	Room 519	C	olumbia	SC	29201
,	,	1 , 1	411 East Franklin Street,					
Counsel for WJH Real Estate, LLC	Spotts Fain PC	Neil E. McCullagh	Suite 600		R	tichmond	VA	23219
Official Committee of Unsecured	·							
Creditors	Standard Motor Products	c/o Darcey Keene	1801 Waters Ridge Dr.		Le	ewisville	TX	75057
Tennessee Attorney General	Tennessee Attorney General	Attn Bankruptcy Department	425 5th Avenue North		N	lashville	TN	37243
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	300 W. 15th St		A	ustin	TX	78701
	Texas Commission on							
Texas State EPA Agency	Environmental Quality	Office of the Commissioner	12100 Park 35 Circle		A	ustin	TX	78753
		Attn Corporate Bankruptcy						
Secretary of the State	Texas Secretary of State	Dept	PO Box 13697		A	ustin	TX	78711-3697
United States Attorney Office for the	US Attorney Office, Southern							
Southern District of Texas	District of Texas	Daniel D. Hu	1000 Louisiana, Suite 2300		H	louston	TX	77002
	US Customs and Border							
US Customs and Border Protection	Protection		1300 Pennsylvania Ave. NW		W	/ashington	DC	20229
	US Environmental Protection					-		
Environmental Protection Agency (US)	Agency		1200 Pennsylvania Ave NW	Ariel Rios Building	W	/ashington		20004
Virginia Attorney General	Virginia Attorney General	Attn Bankruptcy Department	202 North Ninth St		R	tichmond	VA	23219
			State Capitol Bldg 1 Rm E-	1900 Kanawha Blvd.,		-		
West Virginia Attorney General	West Virginia Attorney General	Attn Bankruptcy Department	26	East		harleston	WV	25305
				114 East, State	PO Box	-		
Wisconsin Attorney General	Wisconsin Attorney General	Attn Bankruptcy Department	Wisconsin Dept. of Justice	Capitol	7857 M	ladison	WI	53707-7857

# Exhibit C

### Casse223990055 Diocoumeent35696 FffiteloirinTXXSEBoor035124225 Ffagge1144061880 Exhibit C

## Dorman Products Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
		andrew.gallo@morganlewis.com;
Dorman Products	Morgan, Lewis & Brockius LLP	michael.gocksch@morganlewis.com
Dorman Products		lmiller1@dormanproducts.com

# Exhibit D

## Case 2239900555 Divocume ent 1351696 Fift declarin TXXSSB our 0351243225 Figure 1.66061880 Exhibit D

#### **Dorman Products Service List Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
		Atten Andrew Gallo &				
Dorman Products	Morgan, Lewis & Brockius LLP	Michael Gocksch	One Federal St	Boston	MA	02110-1726
Dorman Products		3400 E. Walnut Street		Colmar	PA	18915

## Exhibit E

### Casse223990055 Diocoumeent35696 FffidelorinTXXSEBoor035124225 Ffagge128061880 Exhibit E

Euler Hermes Agent for Agility Auto Parts Inc. (CLUS007792) Service List Served via Electronic Mail

CreditorName	Email
Euler Hermes Agent for Agility Auto Parts Inc. (	(CLUS007792) insolvency@allianz-trade.com

## Exhibit F

## Case-2239900555 Divocumeent 1351696 Fift electricate XSSE our 0351243225 Figure 2200 of 1880 Exhibit F

Euler Hermes Agent for Agility Auto Parts Inc. (CLUS007792) Service List Served via First Class Mail

CreditorName	Address1	City	State	Zip
Euler Hermes Agent for Agility Auto Parts Inc. (CLUS007792)	800 Red Brook Blvd, Ste 400C	Owings Mills	MD	21117

# Exhibit G

## Casse223990055 Dibocommeent 1351696 Fiffield in in TXXSEBoom 035124225 Fibige 222061880 Exhibit G

### Continental Battery Company Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Continental Battery Company	Audrey Hornisher	ahornisher@clarkhill.com
Continental Battery Company	Rob Williams	rwilliams@gocbs.com

## Exhibit H

## Case-2239900555 Divocumeent 1351696 Fift electrin TTXSSB00000351243225 Figure 2244061880 Exhibit H

#### **Continental Battery Company Service List Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
			901 Main Street			
Continental Battery Company	Audrey Hornisher	Clark Hill PLC	Suite 6000	Dallas	TX	75202
		8585 N. Stemmons				
Continental Battery Company	Rob Williams	Frwy. Floor 6		Dallas	TX	75247

# Exhibit I

### Casse223990055 Diocoumeent35696 FifteldrinTTXSSBoor035124225 Finagee256061880 Exhibit I

### MANN + HUMMEL Filtration Technologies US LLC Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
		len.rowe@mann-hummel.com;
		david.kline@mann-hummel.com;
MANN + HUMMEL Filtration Technologies US LLC	Len Rowe	enrique.linan@mann-hummel.com
MANN + HUMMEL Filtration Technologies US LLC		AR.remittance@mann-hummel.com

# Exhibit J

## Case-2239900555 Divocumeent 1351696 Fift electricate XSSE our 0351243225 Finance 228061880 Exhibit J

### MANN + HUMMEL Filtration Technologies US LLC Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	City	State	Zip
MANN + HUMMEL Filtration Technologies US LLC	Len Rowe	1 Wix Way	Gastonia	NC	28054
MANN + HUMMEL Filtration Technologies US LLC		PO Box 73071	Chicago	IL	60673-7071

## Exhibit K

### Casse2239900555 Dioccumeent 135606 Fifteld in TXXSEC on 10351243225 Fragge 38006 1880 Exhibit K

#### Sixth Omnibus Claimants Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
54 Adelaide St LLC		bcongdon56@gmail.com
Burrillville Tax Assessor	Town of Burriville Tax Collector	mdupont@burrillville.org
Burrillville Tax Assessor	Towns of Daniel Mark Consesses	mdupont@burrillville.org
CARS Training Network Inc.	Kevin Bell	kbell@carstraining.net
CDW	Attn Ronelle Erickson	Roneeri@cdw.com
CI478 Lombardy LLC, BGT Lombardy LLC,	7 10.17 10.17 2.17 2.17 2.17	
Hopewood Lombardy LLC, Stammer		
Lombardy LLC, and MMP Lombardy LLC	Cohen Holdings 2015 LLC	scottm@cohenasset.com
CI478 Lombardy LLC, BGT Lombardy LLC,	ge ze ie zze	
Hopewood Lombardy LLC, Stammer		
Lombardy LLC, and MMP Lombardy LLC	Hamid R. Rafatjoo	hrafatjoo@raineslaw.com
City of Boston	Bankruptcy Cordinator	irena.shipcka@boston.gov
	Linebarger Goggan Blair & Sampson,	
City of El Paso	LLP	sanantonio.bankruptcy@lgbs.com
City of Fredericksburg, Virginia	Brenda A. Wood, Treasurer	bdunkin@fredericksburgva.gov
CITY OF HOUSTON	MELISSA E. VALDEZ	mvaldez@pbfcm.com
City of Mesquite	Grimes & Linebarger, LLP	dallas.bankruptcy@lgbs.com
City of Norfolk	City of Norfolk - Treasurer	zachary.simmons@norfolk.gov
Oity of Norion	Linebarger Goggan Blair & Sampson,	Zaonary.simmons@nonoiik.gov
Dallas County	LLP	dallas.bankruptcy@lgbs.com
Department of Treasury - Internal Revenue		danas.bariki uptoy@igbs.com
Service	Internal Revenue Service	patty.j.story@irs.gov
Dickinson Independent School District	Yolanda M. Humphrey	yhumphrey@pbfcm.com
Diokinson independent concer bistnet	Matt Farley, Esquirer, Vice President,	упатритеушрыстивент
Element Fleet Corporation	Assistant General Counsel	mfarley@elementcorp.com
Emeigh, William T	Assistant General Godniser	Email Redacted
Lineign, vvillam 1	Linebarger Goggan Blair & Sampson,	Email Reducted
Fort Bend Co WCID # 02	LLP	houston_bankruptcy@lgbs.com
T SIT BOILD GO VV OID II GE	Linebarger Goggan Blair & Sampson,	
Fort Bend County	LLP	houston_bankruptcy@lgbs.com
Grote Industries, LLC	Yvon OBanion	yvon.obanion@grote.com
Croto madelines, EES	Tron obalien	idr.bankruptcy@ag.iowa.gov;
Iowa Department of Revenue	Attn Bankruptcy Unit	teresa.corbin@ag.iowa.gov
Teva Beparament of Neverland	Linebarger Goggan Blair & Sampson,	torood.ooronneedg.roma.gov
Irving ISD	LLP	dallas.bankruptcy@lgbs.com
Massachusetts Department of Revenue	Attn Bankruptcy Unit	Limagec@dor.state.ma.us
Plano Independent School District	Linda D. Reece	Ireece@pbfcm.com
Quench		rnehy@quenchwater.com
Rebecca C. Cate Trust	Rebecca C. Cate	Email Redacted
Richardson Independent School District	Eboney Cobb	emccain@pbfcm.com
Sheriff of Wetzel County	Michael L Koontz	mkoontz@wetzelsheriff.com
Sheriff of Wetzel County	IMIGRACI E ROCINE	mkoontz@wetzelsheriff.com
State of New Jersey Division of Taxation	State of NJ Division of Taxation	mikoonizaa wotzoichomi.com
Bankruptcy Section	Bankruptcy	victoria.wright@treas.nj.gov
Three D Investment Irrevocable Trust	Dawn Miller	dawn@smw-inc.com
Three D Investment Irrevocable Trust	Dawn Millor	dawn@smw-inc.com
Tulsa County Treasurer		bankruptcy@tulsacounty.org
. a.sa obaniy mbabaror		robert.nolan@imcpropertymanagement.com;
Tyra Properties, LLC		gwidom@gwidomlaw.com
1,7.0 1 10001000, 220	Attn Revenue Division, Bankruptcy	gcom
U.S. Customs and Border Protection	Team	bankruptcyteam@cbp.dhs.gov
Wetherill Associates, Inc dba WAI Global	Danielle Robb	danielle.robb@waiglobal.com
Wetherill Associates, Inc dba WAI Global	WAI Global	danielle.robb@waiglobal.com
VVCulcilli Associates, Ilic uba VVAI Global	WAI GIUDAI	dariiciic.1000@waigiobai.00111

# Exhibit L

### 

#### Sixth Omnibus Claimants Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
54 Adelaide St LLC		1 Basin View Drive			Pittsford	NY	14534	
Burrillville Tax Assessor	Town of Burriville Tax Collector	105 Harrisville Main St				RI	02830	
Burrillville Tax Assessor		105 Harrisville Main St.				RI	02830	
CARS Training Network Inc.	Kevin Bell	350 Marwood Drive			Oshawa		L1H 8B4	Canada
CDW	Attn Ronelle Erickson	200 N. Milwaukee Ave			Vernon Hills	IL	60061	
Cl478 Lombardy LLC, BGT Lombardy LLC,			1900 Avenue of					
Hopewood Lombardy LLC, Stammer			the Stars, Suite					
Lombardy LLC, and MMP Lombardy LLC	Cohen Holdings 2015 LLC	Scott McGinness	320		Los Angeles	CA	90067	
Cl478 Lombardy LLC, BGT Lombardy LLC,	3				3			
Hopewood Lombardy LLC, Stammer			1900 Avenue of					
Lombardy LLC, and MMP Lombardy LLC	Hamid R. Rafatjoo	Raines Feldman Littrell LLP	the Stars. 19th FI		Los Angeles	CA	90067	
			City Hall Room M-	One City				
City of Boston	Bankruptcy Cordinator	Treasury Dept.	5	Hall Square	Boston	MA	02201	
ony or posteri	Linebarger Goggan Blair & Sampson,			a o qua. o	2001011			
City of El Paso	LLP	2200			San Antonio	TX	78205	
City of El Paso		PO Box 2992			El Paso	TX	79999-2992	
City of Fredericksburg, Virginia	Brenda A. Wood, Treasurer	PO Box 267			Fredericksburg		22404	
City of Frederickeburg, Virginia	Bronda A. Wood, Trododici	1235 NORTH LOOP WEST			rrederionoburg	V/ (	22404	
CITY OF HOUSTON	MELISSA E. VALDEZ	SUITE 600			HOUSTON	TX	77008	
City of Mesquite	Grimes & Linebarger, LLP	120 W. Main, Suite 201			Mesquite	TX	75149	
City of Norfolk	City of Norfolk - Treasurer	810 Union Street			Norfolk	VA	23510	
City of Horioix	Linebarger Goggan Blair & Sampson,				TTOTION	V/ \	20010	
Dallas County	LLP	Suite 1000			Dallas	TX	75207	
Department of Treasury - Internal Revenue					Banas	170	7 0207	
Service	Internal Revenue Service	P.O. Box 7346			Philadelphia	PA	19101-7346	
Department of Treasury - Internal Revenue	Internal Neveride Gervice	1919 Smith Street, M/S			Tilladelpilla	1.7	13101-7340	
Service	Internal Revenue Service	5022HOU			Houston	TX	77002	
0011100	THOMAI TOVERIGE COLVICE	1235 North Loop West, Suite			Houston	17	77002	
Dickinson Independent School District	Yolanda M. Humphrey	600			Houston	TX	77008	
Dickinson Independent School District	Tolanda W. Humphrey	PO Box 1169			Galveston	TX	77553	
Dickinson independent ochool district	Matt Farley, Esquirer, Vice President,				Galveston	17	77333	
Element Fleet Corporation	Assistant General Counsel	940 Ridgebrook Road			Sparks	MD	21152	
Emeigh, William T	Assistant General Godniser	Address Redacted			Орагко	IVID	21102	
Fort Bend Co WCID # 02	Fort Bend County	1317 Eugene Heimann Circle			Richmond	TX	77469-3623	
TOT Bend CO WCID # 02	Linebarger Goggan Blair & Sampson,	1317 Eugene Heimann Oncie			Moninoria	17	11409-3023	
Fort Bend Co WCID # 02	ITP	PO Box 3064			Houston	TX	77253-3064	
TOT Bend CO WCID # 02	Linebarger Goggan Blair & Sampson,				Tiouston	17	77233-3004	
Fort Bend County	LLP	PO Box 3064			Houston	TX	77253-3064	
Fort Bend County	LLI	1317 Eugene Heimann Circle			Richmond	TX	77469-3623	
Grote Industries, LLC	Yvon OBanion	2600 Lanier Drive			Madison	IN	47250	
Olote industries, LLO	I VOIT ODAITION	Office of the Attorney General	1305 E Walnut	1	IVIAUISUII	11.1	71 200	
lowa Department of Revenue	Attn Bankruptcy Unit	of lowa	Street		Des Moines	IA	50319	
lowa Department of Neverlue	Linebarger Goggan Blair & Sampson,		Ollegi		Des MOILIES	iA	30318	
Irving ISD	LLP	Suite 1000			Dallas	TX	75207	
living iou	LLF	Suite 1000			Dallas	I۸	13201	

### Case 223990555 Document 35696 Filted in TXSSB on 03512225 Flage 3330680 Exhibit L

#### Sixth Omnibus Claimants Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Massachusetts Department of Revenue	Attn Bankruptcy Unit	PO Box 7090			Boston	MA	02204	
			1919 S. Shiloh					
		c/o Perdue Brandon Fielder et	Road, Suite 640,					
Plano Independent School District	Linda D. Reece	al	LB 40		Garland	TX	75042	
Quench		630 Allendale Road, Suite 200			King of Prussia	PA	19406	
Rebecca C. Cate Trust	Rebecca C. Cate	Address Redacted						
		c/o Perdue Brandon Fielder et	500 East Border					
Richardson Independent School District	Eboney Cobb	al	St, Suite 640		Arlington	TX	76010	
					New			
Sheriff of Wetzel County	Michael L Koontz	200 Main St			Martinsville	WV	26155	
					New			
Sheriff of Wetzel County		PO Box D			Martinsville	WV	26155	
State of New Jersey Division of Taxation	State of NJ Division of Taxation							
Bankruptcy Section	Bankruptcy	3 John Fitch Way	PO Box 245		Trenton	NJ	08695-0245	
Three D Investment Irrevocable Trust	Dawn Miller	9380 Ulmerton Rd			Largo	FL	33771	
Three D Investment Irrevocable Trust		PO Box 3311			Seminole	FL	33775	
Tulsa County Treasurer		218 W 6th St 8th Floor			Tulsa	OK	74119	
Tyra Properties, LLC		696 NE 125th St.			North Miami	FL	33161	
	Attn Revenue Division, Bankruptcy							
U.S. Customs and Border Protection	Team	6650 Telecom Dr., Suite 100			Indianapolis	IN	46278	
Wetherill Associates, Inc dba WAI Global	Danielle Robb	3300 Corporate Way			Miramar	FL	33066	
			2841 Corporate					
Wetherill Associates, Inc dba WAI Global	WAI Global	Danielle Robb	Way		Miramar	FL	33025	

# Exhibit M

## Casse2239900555 Diocoumeent 35696 Ffilidectrin TXXSSBoom 035124225 Ffilidectrin TXXSSBOOM 03512425 Ffili

#### Seventh Omnibus Claimants Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Allegiance Staffing		alussier@allegiancestaffing.com
Charles Rigby		Email Redacted
City of Fredericksburg, Virginia	Brenda A. Wood, Treasurer	bdunkin@fredericksburgva.gov
Department of Treasury - Internal Revenue		
Service	Internal Revenue Service	patty.j.story@irs.gov
Edward Stolarcyk	Mike Stolarcyk	Email Redacted
Garrison, Ephraim S		Email Redacted
Heins,Stacy J		Email Redacted
Insight Global, LLC	Attn Will Rooks	will.rooks@insightglobal.com
Insight Global, LLC	Bryan Kaplan, Esq.	bk@kaplanlawga.com
Insight Global, LLC	Kaplan Legal Services, LLC	bk@kaplanlawga.com
J AND J BAUMHARDT AGGREGATES INC		acostello@baumhardts.com
Jason R. Warner		Email Redacted
Life Insurance Company of North America	Connolly Gallagher LLP	jwisler@connollygallagher.com
Life Insurance Company of North America	Lisa Durrenberger, Senior Specialist	lisa_a_durrenberger@newyorklife.com
Massachusetts Department of Revenue	Attn Bankruptcy Unit	joyces@dor.state.ma.us
		yeke@dor.state.ma.us;
Massachusetts Department of Revenue	Mass. Dept. of Revenue	joyces@dor.state.ma.us
Peerless Chain Company	Paul Johnston	paul.johnston@harringtonhoists.com
Rhode Island Division of Taxation	c/o Crystal Cote	crystal.cote@tax.ri.gov
Stacy Heins		Email Redacted
	FL Department of Revenue,	
State of Florida - Department of Revenue	Bankruptcy	fdor_bankruptcy@floridarevenue.com
State of Florida - Department of Revenue	Frederick F. Rudzik, Ezq.	fred.rudzik@floridarevenue.com
	State of New Jersey Division of	
State of New Jersey Division of Taxation	Taxation Bankruptcy Section	victoria.wright@treas.nj.gov
State of New Jersey Division of Taxation		victoria.wright@treas.nj.gov
State of New Jersey Division of Taxation	State of NJ Division of Taxation	
Bankruptcy Section	Bankruptcy	victoria.wright@treas.nj.gov
Town and Country Building Services		khawley@tcbuildingservices.com

## Exhibit N

### Casse223990655 Documeent35696 FilideldrinTXXSBBoon035123225 Filiagee337061880 Exhibit N

#### Seventh Omnibus Claimants Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Allegiance Staffing		5726 Root Rd		Spring	TX	77389
Allegiance Staffing		PO BOX 4356	DEPT 1903	HOUSTON	TX	77210-4356
Charles Rigby		Address Redacted				
City of Fredericksburg, Virginia	Brenda A. Wood, Treasurer	PO Box 267		Fredericksburg	VA	22404
Department of Treasury - Internal Revenue		1919 Smith Street, M/S				
Service	Internal Revenue Service	5022HOU		Houston	TX	77002
Department of Treasury - Internal Revenue						
Service	Internal Revenue Service	P.O. Box 7346		Philadelphia	PA	19101-7346
Edward Stolarcyk		Address Redacted				
Garrison, Ephraim S		Address Redacted				
Heins,Stacy J		Address Redacted				
		1224 Hammond Dr., Suite				
Insight Global, LLC	Attn Will Rooks	1500		Atlanta	GA	30346
Insight Global, LLC	Bryan Kaplan, Esq.	PO Box 11569		Atlanta	GA	30355
			6065 Roswell Rd, Ste			
Insight Global, LLC	Kaplan Legal Services, LLC	Bryan Kaplan, Esq.	540	Atlanta	GA	30328
J AND J BAUMHARDT AGGREGATES INC		W3998 HWY 45		EDEN	WI	53019
Jason R. Warner		Address Redacted				
			1201 North Market			
Life Insurance Company of North America	Connolly Gallagher LLP	Jeffrey C. Wisler	Street, 20th Floor	Wilmington	DE	19801
Life Insurance Company of North America	Lisa Durrenberger, Senior Specialist	51 Madison Avenue		New York	NY	10010
Massachusetts Department of Revenue	Attn Bankruptcy Unit	P.O. Box 7090		Boston	MA	02204-7090
Massachusetts Department of Revenue	Mass. Dept. of Revenue	Attn Bankruptcy Unit	PO Box 7090	Boston	MA	02204-7090
New York State Department of Taxation &						
Finance	Bankruptcy Section	PO Box 5300		Albany	NY	12205
Peerless Chain Company	Paul Johnston	1416 East Sanborn St.		Winona	MN	55987
Rhode Island Division of Taxation	c/o Crystal Cote	1 Capitol Hill		Providence	RI	02908
Stacy Heins		Address Redacted				
	FL Department of Revenue,					
State of Florida - Department of Revenue	Bankruptcy	PO Box 8045		Tallahassee	FL	32314
State of Florida - Department of Revenue	Frederick F. Rudzik, Ezq.	PO Box 6668		Tallahassee	FL	32314
	State of New Jersey Division of					
State of New Jersey Division of Taxation	Taxation Bankruptcy Section	Victoria Wright	PO Box 245	Trenton	NJ	06895
State of New Jersey Division of Taxation		3 John Fitch Way		Trenton	NJ	08695-0245
State of New Jersey Division of Taxation	State of NJ Division of Taxation					
Bankruptcy Section	Bankruptcy	3 John Fitch Way	PO Box 245	Trenton	NJ	08695-0245
Town and Country Building Services		PO Box 7067		Lees Summit	MO	64064

# Exhibit O

## Casse223990055 Dibocommeent 1351696 Fiffield in in TXXSEBoom 035124225 Finance 39061880 Exhibit O

## Integrated Supply Network, LLC Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Integrated Supply Network, LLC	Attn Jacob Sistrunk	jacob.sistrunk@isnweb.com
Integrated Supply Network, LLC	c/o Rhys P. Leonard, Esq.	rleonard@trenam.com

## Exhibit P

## Case-2239900555 Divocumeent 1351696 Fifteld rin TTXSSB0 on 0351243255 Figure 44.1061880 Exhibit P

### Integrated Supply Network, LLC Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Integrated Supply Network, LLC	Attn Jacob Sistrunk	2727 Interstate Drive		Lakeland	FL	33805
			101 E Kenney			
			Boulevard, Suite			
Integrated Supply Network, LLC	c/o Rhys P. Leonard, Esq.	Trenam Law	2700	Tampa	FL	33602

# Exhibit Q

### Casse223990055 Diocoumeent35696 FffidelorinTXXSEBoor035124225 Ffagge4433061880 Exhibit Q

### Eighth Omnibus Claimants Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Ankita Sharma	Davis, Saperstein & Salomon, P.C.	Email Redacted
Ankita Sharma		Email Redacted
	Matt Farley, Esquirer, Vice President,	
Element Fleet Corporation	Assistant General Counsel	mfarley@elementcorp.com
Ford Motor Company	Attn Donald H. Cram	dhc@severson.com
		ar@tycamericas.com;
Genera Corporation dba TYC Americas	Genera Corporation	ar@genera.com
		sportman.uremco@gmail.com;
United Remanufacturing Co Inc		SCOTT.PORTMAN@UREMCOINC.COM
W. W. Grainger, Inc		kimberly.fara@grainger.com

## Exhibit R

### Case-2239900555 Divocumeent 1351696 Fift electrin TTXSSB000000551243225 Finance 4455061880 Exhibit R

### **Eighth Omnibus Claimants Service List Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Ankita Sharma	Davis, Saperstein & Salomon, P.C.	Address Redacted				
Ankita Sharma		Address Redacted				
	Matt Farley, Esquirer, Vice President,					
Element Fleet Corporation	Assistant General Counsel	940 Ridgebrook Road		Sparks	MD	21152
			595 Market Street,			
Ford Motor Company	Attn Donald H. Cram	c/o Severson and Werson	Suite 2600	San Francisco	CA	94115
Genera Corporation dba TYC Americas	Genera Corporation	2800 Saturn St		Brea	CA	92821
United Remanufacturing Co Inc		9550 Soreng Ave		Schiller Park	IL	60176
W. W. Grainger, Inc		401 S. Wright Rd.		Janesville	WI	53546

## Exhibit S

### Casse223990055 Diocoumeent35696 FffidelorinTXXSEBoor035124225 Ffagge4477061880 Exhibit S

### Parts Authority, LLC Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
		lisa.tanzi@partsauthority.com;
Parts Authority, LLC	Lisa M. Tanzi	legal@partsauthority.com
Parts Authority, LLC	Michael J. Small, Esq.	msmall@foley.com

## Exhibit T

### Case-2239900555 Divocumeent 1351696 Fift declaring TXXSSB on 0351243225 Figure 4499 of 1880 Exhibit T

### Parts Authority, LLC Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Parts Authority, LLC	Lisa M. Tanzi	3 Dakota Drive Suite 110		New Hyde Park	NY	11042
			321 N. Clark Street			
Parts Authority, LLC	Michael J. Small, Esq.	Foley and Lardner LLP	Suite 3000	Chicago	IL	60654

## Exhibit U

### Casse2239900555 Diocoumeent 35696 Fifteld nint XXSEBoon 035124225 Fragge 551.1061880 Exhibit U

#### Ninth Omnibus Claimants Service List Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Brazoria County, et al	Michael J. Darlow	mdarlow@pbfcm.com
Constellation NewEnergy, Inc.		strategiccreditsolutions@constellation.com
		dbrescia@clarkhill.com;
Fidelity and Deposit Company of Maryland	c/o Duane J. Brescia	kwebster@clarkhill.com
Fidelity and Deposit Company of Maryland	Helen Rasmussen	helen.rasmussen@zurichna.com
General Motors LLC	E. Todd Sable	tsable@honigman.com
General Motors LLC	GM Customer Care and Aftersales	susan.fritts@gm.com
		dpascarella@farrellfritz.com;
Getty Properties Corp.	Attn Darren A. Pascarella	elokis@gettyrealty.com
Getty Properties Corp.		elonkis@gettyrealty.com
	LINEBARGER GOGGAN BLAIR &	
HARRIS COUNTY, ET AL	SAMPSON, LLP	houston_bankruptcy@lgbs.com
Liberty Mutual Insurance Company	Nina M Durante	nina.durante@libertymutual.com
PASADENA INDEPENDENT SCHOOL		
DISTRICT	MELISSA E. VALDEZ	mvaldez@pbfcm.com
PASADENA INDEPENDENT SCHOOL		
DISTRICT		mvaldez@pbfcm.com
	Wells Fargo Equipment Finance,	
Wells Fargo Bank, N.A.	MSG	bankruptcynoticesdfvendor@wellsfargo.com

## Exhibit V

### Case-2239900555 Divocumeent 1351696 Filideld in TTXSSB0 on 0351243225 Filide established Exhibit V

#### Ninth Omnibus Claimants Service List Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Brazoria County, et al	Brazoria County Tax Office	111 E Locust			Angleton	TX	77515-4682
		1235 North Loop West, Suite					
Brazoria County, et al	Michael J. Darlow	600			Houston	TX	77008
Constellation NewEnergy, Inc.		1310 Point Street 12th Floor			Baltimore	MD	21231
Constellation NewEnergy, Inc.		P.O. Box 4640			Carol Stream	IL	60197-4640
			720 Brazos Street,				
Fidelity and Deposit Company of Maryland	c/o Duane J. Brescia	Clark Hill PLC	Suite 700		Austin	TX	78701
Fidelity and Deposit Company of Maryland	Helen Rasmussen	PO Box 968036			Schaumberg	IL	60196
			2290 First National	660 Woodward			
General Motors LLC	E. Todd Sable	Honigman LLP	Building	Avenue	Detroit	MI	48226-3506
General Motors LLC	GM Customer Care and Aftersales	Susan M. Fritts	PO Box 13595		Newark	NJ	07188-3595
		Susan M. Fritts, Finance					
		Supervisor - CCA Credit/Order	29755 Louis Chevrolet				
General Motors LLC	GM Customer Care and Aftersales	to Cash	Road, MC 480-210-3LB		Warren	MI	48093-2350
Getty Properties Corp.	Attn Darren A. Pascarella	Farrell Fritz, P.C.	400 RXR Plaza		Uniondale	NY	11556
Getty Properties Corp.		292 Madison Ave. 9th Floor			New York	NY	10017-6376
	LINEBARGER GOGGAN BLAIR &						
HARRIS COUNTY, ET AL	SAMPSON, LLP	PO BOX 3064			HOUSTON	TX	77253-3064
HARRIS COUNTY, ET AL		PO BOX 3547			HOUSTON	TX	77253-3547
		1001 Fourth Avenue, Ste.					
Liberty Mutual Insurance Company	Nina M Durante	3800			Seattle	WA	98154
PASADENA INDEPENDENT SCHOOL		1235 NORTH LOOP WEST					
DISTRICT	MELISSA E. VALDEZ	SUITE 600			HOUSTON	TX	77008
PASADENA INDEPENDENT SCHOOL							
DISTRICT		PO BOX 1318			PASADENA	TX	77501
		Bankruptcy & Collections					
Texas Comptroller of Public Accounts	Office of the Attorney General	Division MC-008	P.O. Box 12548		Austin	TX	78711-2548
Texas Comptroller of Public Accounts	Revenue Accounting Division	Attention Bankruptcy	P.O. Box 13528		Austin	TX	78711-3528
	Wells Fargo Equipment Finance,	800 Walnut Street MAC F0005-					
Wells Fargo Bank, N.A.	MSG	055			Des Moines	IA	50309
	WELLS FARGO EQUIPMENT						
Wells Fargo Bank, N.A.	FINANCE, MSG	PO BOX 77101			MINNEAPOLIS	MN	55480-7101

## Exhibit W

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	_	
	)	Chapter 11
In re:	)	
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

#### NOTICE OF OBJECTION TO CLAIM

The above-captioned wind-down debtor (the "Wind-Down Debtor" and prior to the Effective Date,<sup>2</sup> the "Debtor"), has filed an objection to the proof of claim you filed in this bankruptcy case (your "Claim" or "Proof of Claim") on the basis that the secured, administrative, or priority portion of your claim should be disallowed because (a) it was satisfied or released during the chapter 11 cases in connection with the assumption of a contract or lease pursuant to the Plan or a court order as identified on Schedule 1 of the Omnibus Objection, (b) it was filed after the applicable bar date as identified on Schedule 2 of the Omnibus Objection, (c) it asserts an amount for which the Wind-Down Debtor is not liable as identified on Schedule 3 of the Omnibus Objection, or (d) it has already been satisfied as identified on Schedule 4 of the Omnibus Objection.

Your Claim may be reduced or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. This Notice package includes:

- 1. The Wind-Down Debtor's Sixth Omnibus Objection to Certain Proofs of Claim (Assigned Contract Claims, Untimely Claims, No Liability Claims, and Satisfied Claims) (the "Omnibus Objection");
  - 2. The Omnibus Objection Procedures;<sup>3</sup>
- 3. A form to complete and deliver to the Wind-Down Debtors' claims agent should you wish to withdraw your Proof of Claim(s); and

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kcellc.net/autoplus">https://www.kcellc.net/autoplus</a>.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined have the meaning given to them in the *Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Case No. 23-90054, Docket No. 738] (the "Plan").

On August 10, 2023, the Court entered an order [Case No. 23-90054, Docket No. 850] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the "Omnibus Objection Procedures").

#### 4. This Notice.

If you do not want the Court to reduce or eliminate your Claim, then on or before March 31, 2025 (the "Response Deadline"), you or your lawyer must file a written response (a "Response") in accordance with the Omnibus Objection Procedures. Please review the Omnibus Objection Procedures and follow the instructions for filing Responses to Omnibus Objections to ensure that your Response is timely and correctly filed and served. If you mail your Response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the Response Deadline.

If you disagree with the Omnibus Objection, you must participate in the Hearing. The Hearing will take place on **April 15, 2025, at 10:00 a.m.** in Courtroom 401, United States Bankruptcy Court, 515 Rusk, 4<sup>th</sup> Floor, Houston, Texas 77002. The Hearing will be a status conference and you may attend in person or virtually.

Audio communication will be by the use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's homepage. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you or your attorney do not take these steps in accordance with the Omnibus Objection Procedures, the Court may decide that you do not oppose the objection to your Claim. Judge Lopez's home page is available here: <a href="https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez">https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez</a>.

Copies of the Omnibus Objection, the Omnibus Objection Procedures, and all other pleadings (the "Pleadings") filed in these bankruptcy cases are available for free at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these bankruptcy cases for a fee at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov.">http://www.pacer.gov.</a>

Houston, Texas

Dated: February 28, 2025

### /s/ Veronica A. Polnick

### JACKSON WALKER LLP

Matthew D. Cavenaugh (TX Bar No. 24062656) Veronica A. Polnick (TX Bar No. 24079148) Emily Meraia (TX Bar No. 24129307) Zachary McKay (TX Bar No. 24073600) 1401 McKinney Street, Suite 1900 Houston, Texas 77010

Telephone: (713) 752-4200 Facsimile: (713) 752-4221

E-mail: mcavenaugh@jw.com

vpolnick@jw.com emeraia@jw.com zmckay@jw.com

Counsel to the Wind-Down Debtor

## Exhibit X

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	
In re:	)	Chapter 11
	)	
IEH AUTO PARTS HOLDING LLC, et al., 1	)	Case No. 23-90054 (CML)
	)	
Debtors.	)	(Jointly Administered)
	)	,

### PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

- 1. <u>Grounds for Omnibus Objections</u>. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Debtors<sup>2</sup> may file omnibus objections (each, an "<u>Omnibus Objection</u>") to Claims on the grounds (the "<u>Additional Grounds</u>") that such Claims, in part or in whole:
  - a. fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");
  - b. seek recovery of amounts for which the Debtors are not liable;
  - c. are satisfied by payment in full or in part on account of such Claim from a party that is not a debtor, including one or more of the Debtors' insurers;
  - d. are incorrectly or improperly classified;
  - e. are filed against non-Debtors, the incorrect Debtor, or multiple Debtors;
  - f. fail to specify a Debtor against which the Claim is asserted;
  - g. are disallowed or subordinated to all Claims senior to or equal to the asserted Claim arising out of the purchase or sale of a security of the Debtor or affiliate pursuant to section 510(b) of the Bankruptcy Code;

The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

- h. are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan; or
- i. have not been timely filed by parties to prepetition litigation with the Debtors.
- 2. <u>Form of Omnibus Objection</u>. Each Omnibus Objection will be numbered consecutively, regardless of basis. The Claims subject to the Omnibus Objection will be listed alphabetically by claimant on the schedules attached to each Omnibus Objection.
- 3. <u>Supporting Documentation</u>. In accordance with Local Bankruptcy Rule 3007-1, Omnibus Objections must include an affidavit or declaration signed by a person with personal knowledge supporting the objection.
- 4. <u>Claims Exhibits</u>. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which there is a common basis for the objection. Claims for which there is more than one basis for the objection will be referenced on each exhibit applicable thereto. Including a Claim on one exhibit will not constitute a waiver of the Debtors' right to object to the Claim on an additional basis or bases. The exhibits will include, without limitation, the following information:
  - a. the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the claims register;
  - b. the asserted amount of the Claim;
  - c. the grounds for the objection; and
  - d. other information, as applicable, including: (i) the proposed classification of Claims the Debtors seek to reclassify; (ii) the proposed allowed Claim amounts of claims the Debtors seek to reduce; and/or (iii) the surviving Claims, if any, of claimants affected by the Omnibus Objection.
- 5. <u>Objection Notice</u>. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the "Objection Notice"), which will:
  - a. describe the basic nature of the objection;
  - b. inform creditors how to file a written response (each, a "Response") to the objection;
  - c. identify the hearing date, if applicable, and information on how to participate; and
  - d. describe how copies of proofs of claim, the Omnibus Objection, and other pleadings filed in the chapter 11 cases may be obtained.

- 6. <u>Notice and Service</u>. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice and these Procedures) will be mailed to each claimholder that is subject to such objection.
- 7. Omnibus Claims Objection Hearings. Each Omnibus Objection shall be set for hearing no less than 30 days after service of the Omnibus Objection (each, a "Hearing"), unless otherwise ordered by the Court. For all Hearings:
  - a. Unless agreed to by the Debtors and the claimant, or otherwise ordered by the Court, the first hearing on any Omnibus Objection shall be a non-evidentiary status conference.
  - b. Upon no less than 10 days' notice, the Debtors, or any claimant that has filed a timely response, may file a motion to continue any Hearing.
  - c. By agreement (email being sufficient), the Debtors and claimants may agree to reset any Hearing with respect to any Claim.
- 8. <u>Hearing Participation</u>. The first Hearing on an Omnibus Objection shall be a status conference and shall be a virtual hearing consistent with section I of the Complex Procedures (i.e., no in-person participation will be permitted). Unless otherwise ordered by the Court, all subsequent Hearings on an Omnibus Objection will be remote hearings consistent with section H of the Complex Procedures (i.e., all parties may elect to appear either in person or virtually). Instructions for appearing at the Hearing shall be included on the first page of each Omnibus Objection.
- 9. <u>Contested Matter</u>. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim.

### **Responses to Omnibus Objections**

- 10. Parties Required to File a Response. Any party who disagrees with an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein and to appear at the Hearing(s) with respect to their Claim. If a claimant whose Claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below or fails to appear at the Hearing(s), the Court may grant the relief requested in the Omnibus Objection with respect to such Claim without further notice to the claimant.
- 11. <u>Failure to Respond</u>. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Debtors resolving the objection to a Claim, failure to timely file and serve a Response as set forth herein or to appear at the Hearing(s) may result in the Court**

**granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

- 12. Response Contents. Each Response must contain the following (at a minimum):
  - a. This case caption:<sup>3</sup>

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION				
In re:	)	Chapter 11		
AUTO PLUS AUTO SALES LLC,	)	Case No. 23-90055 (CML)		
Wind-Down Debtor. <sup>1</sup>	) ) )	(Formerly Jointly Administered under Lead Case IEH Auto Parts Holding LLC, Case No. 23-90054)		

- b. The responding party's name and the number of the Omnibus Objection to which the Response is directed,
- c. The factual basis and specific reasons for disagreement with the Omnibus Objection;
- d. If applicable, the Proof of Claim number(s) from the Claims Register to which the Response relates; and
- e. The following contact information for the responding party:
  - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.
- 13. <u>Filing and Service of the Response</u>. A Response will be deemed timely only if it is filed with the Court and served electronically using the Court's electronic filing system and

In re: Auto Plus Auto Sales, LLC.

The Debtors may revise these procedures for service purposes to include the case caption of a remaining case in the event that Case No. 22-90054 is closed in the future.

Case No. 22-90054 was closed on January 16, 2024, pursuant to the Court's *Final Decree Closing Certain of the Chapter 11 Cases* [Case No. 23-90054, Dkt. #1043]. All Responses should be filed in Case No. 23-90055 styled

actually received on the response date specified in the Objection Notice (the "Response Deadline") by the following parties (the "Notice Parties"):

#### 1) Debtors' counsel:

Jackson Walker LLP

1401 McKinney Street, Suite 1900

Houston, TX 77010

Attention: Matthew Cavenaugh

Veronica A. Polnick Zachary McKay Vienna F. Anaya Emily Flynn Meraia

E-mail: mcavenaugh@jw.com

vpolnick@jw.com zmckay@jw.com vanaya@jw.com emeraia@jw.com

- and -

Law Office of Liz Freeman

PO Box 61209

Houston, TX 77208

Attention: Elizabeth C. Freeman

Email: liz@lizfreemanlaw.com

#### 2) The U.S. Trustee:

**Hector Duran** 

Stephen Statham

Office of the United States Trustee for the Southern District of Texas

515 Rusk St, Ste. 3516

Houston, Texas 77002

hector.duran.jr@usdoj.com

stephen.statham@usdoj.com

#### 3) Counsel to the Unsecured Creditors' Committee GUC Trustee:

Joseph M. Coleman

John J. Kane

Kyle Woodard

KANE RUSSELL COLEMAN LOGAN PC

Bank of America Plaza

901 Main Street, Suite 5200

Dallas, Texas 75202

(214) 777-4200

jcoleman@krcl.com jkane@krcl.com kwoodard@krcl.com

- and -

Michael D. Warner
PACHULSKI STANG ZIEHL & JONES LLP
440 Louisiana Street, Suite 900
Houston, TX 77002
(713) 691-9385
mwarner@pszjlaw.com

If you do not have electronic filing privileges, you must also mail your Response to the Court, such that it is received by the Response Deadline, at:

Nathan Oschner Clerk of Court 515 Rusk Street, 5<sup>th</sup> Floor Houston, Texas 77002

- 14. <u>Informal Resolution</u>. Parties to an Omnibus Objection may engage in settlement discussions to resolve the matter without the need for a hearing. The Debtors may utilize Rule 68 of the Federal Rules of Civil Procedure with respect to Omnibus Objections, as modified by this paragraph 14. Rule 68 provides, in pertinent part:
  - (a) MAKING AN OFFER; JUDGMENT ON AN ACCEPTED OFFER. At least 14 days before the date set for trial, a party objecting to a claim may serve on an opposing party an offer to allow judgment on specified terms, with the costs then accrued. If, within 14 days after being served, the opposing party serves written notice accepting the offer, either party may then file the offer and notice of acceptance, plus proof of service. The clerk must then enter judgment.
  - (b) UNACCEPTED OFFER. An unaccepted offer is considered withdrawn, but it does not preclude a later offer. Evidence of an unaccepted offer is not admissible except in a proceeding to determine costs.

\* \* \*

(d) PAYING COSTS AFTER AN UNACCEPTED OFFER. If the judgment that the offeree finally obtains is not more favorable than the unaccepted offer, the offeree must pay the costs incurred after the offer was made.

The Debtors will not utilize Rule 68 against unrepresented parties. Rule 68(d) is further modified such that if the ruling finally obtained is not more favorable to the offeree than the unaccepted offer, the Debtors may seek reimbursement of costs incurred after the offer was made.

#### **Miscellaneous**

- 15. <u>Additional Information</u>. Copies of these procedures, the Motion, the Order or any other pleadings (the "<u>Pleadings</u>") filed in these chapter 11 cases are available at no cost at the Debtors' restructuring website <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court's website at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Court's Public Access to Court Electronic Records ("<u>PACER</u>") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov">http://www.pacer.gov</a>.
- Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A WAIVER OF ANY RIGHT OF ANY DEBTOR TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO BANKRUPTCY CODE SECTION 365; OR (F) A WAIVER OF ANY RIGHT OF ANY DEBTOR UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

## Exhibit Y

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	<del></del> _
In re:	) Chapter 11
IEH AUTO PARTS HOLDING LLC, et al.,1	) Case No. 23-90054 (CML)
Debtors.	) (Jointly Administered)
WITHDRAWAL OF PROC	OF OF CLAIM NO
Claimant,	[Claimant Name(s)],
hereby withdraws with prejudice its proof of clair	m No[Claim Number(s)].
Signed:	
Print Name	o:
Title:	
Claimant Name:	
Address:	Please mail this form via U.S. Mail to:  IEH Auto Parts Holding LLC
Address:	Claims Processing Conton
City, State, Zip:	222 N Pacific Coast Highway Suite 300
Phone:	01, 3 00 11103 0111011 0
Email:	autoplusinfo@kccllc.com 

The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

## Exhibit Z

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	_	
	)	Chapter 11
In re:	)	•
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

#### NOTICE OF OBJECTION TO CLAIM

The above-captioned wind-down debtor (the "Wind-Down Debtor" and prior to the Effective Date,<sup>2</sup> the "Debtor"), has filed an objection to the proof of claim you filed in this bankruptcy case (your "Claim" or "Proof of Claim") on the basis that the secured, administrative, or priority portion of your claim should be disallowed or modified because (a) it was amended by a later filed proof of claim as identified on Schedule 1 of the Omnibus Objection, (b) it was filed under an incorrect classification based on applicable law as identified on Schedule 2 of the Omnibus Objection, (c) it is a duplicate of another claim as identified on Schedule 3 of the Omnibus Objection, or (d) it was partially satisfied during the chapter 11 cases as identified on Schedule 4 of the Omnibus Objection.

Your Claim may be modified or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. This Notice package includes:

- 1. The Wind-Down Debtor's Seventh Omnibus Objection to Certain Proofs of Claim (Amended Claims, Reclassified Claims, Duplicate Claim, and Partially Satisfied Claims) (the "Omnibus Objection");
  - 2. The Omnibus Objection Procedures;<sup>3</sup>
- 3. A form to complete and deliver to the Wind-Down Debtors' claims agent should you wish to withdraw your Proof of Claim(s); and

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined have the meaning given to them in the *Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Case No. 23-90054, Docket No. 738] (the "Plan").

On August 10, 2023, the Court entered an order [Case No. 23-90054, Docket No. 850] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the "Omnibus Objection Procedures").

#### 4. This Notice.

If you do not want the Court to modify, reduce, or eliminate your Claim, then on or before March 31, 2025 (the "Response Deadline"), you or your lawyer must file a written response (a "Response") in accordance with the Omnibus Objection Procedures. Please review the Omnibus Objection Procedures and follow the instructions for filing Responses to Omnibus Objections to ensure that your Response is timely and correctly filed and served. If you mail your Response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the Response Deadline.

If you disagree with the Omnibus Objection, you must participate in the Hearing. The Hearing will take place on **April 15, 2025, at 10:00 a.m.** in Courtroom 401, United States Bankruptcy Court, 515 Rusk, 4<sup>th</sup> Floor, Houston, Texas 77002. The Hearing will be a status conference and you may attend in person or virtually.

Audio communication will be by the use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's homepage. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you or your attorney do not take these steps in accordance with the Omnibus Objection Procedures, the Court may decide that you do not oppose the objection to your Claim. Judge Lopez's home page is available here: <a href="https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez">https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez</a>.

Copies of the Omnibus Objection, the Omnibus Objection Procedures, and all other pleadings (the "Pleadings") filed in these bankruptcy cases are available for free at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these bankruptcy cases for a fee at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov.">http://www.pacer.gov.</a>

Houston, Texas

Dated: February 28, 2025

### /s/ Veronica A. Polnick

### JACKSON WALKER LLP

Matthew D. Cavenaugh (TX Bar No. 24062656) Veronica A. Polnick (TX Bar No. 24079148) Emily Meraia (TX Bar No. 24129307) Zachary McKay (TX Bar No. 24073600) 1401 McKinney Street, Suite 1900 Houston, Texas 77010

Telephone: (713) 752-4200 Facsimile: (713) 752-4221

E-mail: mcavenaugh@jw.com

vpolnick@jw.com emeraia@jw.com zmckay@jw.com

Counsel to the Wind-Down Debtor

## Exhibit AA

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	_	
	)	Chapter 11
In re:	)	•
	)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC,1	)	
	)	(Formerly Jointly Administered under
Wind-Down Debtor.	)	Lead Case IEH Auto Parts Holding
	)	LLC, Case No. 23-90054)
	)	

#### NOTICE OF OBJECTION TO CLAIM

The above-captioned wind-down debtor (the "<u>Wind-Down Debtor</u>" and prior to the Effective Date,<sup>2</sup> the "<u>Debtor</u>"), has filed an objection to the proof of claim you filed in this bankruptcy case (your "<u>Claim</u>" or "<u>Proof of Claim</u>") on the basis that the secured portion of your claim should be reclassified to a general unsecured claim as identified on <u>Schedule 1</u> of the Omnibus Objection.

Your Claim may be reduced or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. This Notice package includes:

- 1. The Wind-Down Debtor's Eighth Omnibus Objection to Certain Proofs of Claim (Reclassified Secured Claims) (the "Omnibus Objection");
  - 2. The Omnibus Objection Procedures;<sup>3</sup>
- 3. A form to complete and deliver to the Wind-Down Debtors' claims agent should you wish to withdraw your Proof of Claim(s); and
  - 4. This Notice.

If you do not want the Court to eliminate your Claim, then on or before March 31, 2025 (the "Response Deadline"), you or your lawyer must file a written response (a "Response") in accordance with the Omnibus Objection Procedures. Please review the Omnibus Objection Procedures and follow the instructions for filing Responses to Omnibus Objections to ensure

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kcellc.net/autoplus">https://www.kcellc.net/autoplus</a>.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined have the meaning given to them in the *Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Case No. 23-90054, Docket No. 738] (the "Plan").

On August 10, 2023, the Court entered an order [Case No. 23-90054, Docket No. 850] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the "Omnibus Objection Procedures").

<u>that your Response is timely and correctly filed and served</u>. If you mail your Response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the Response Deadline.

If you disagree with the Omnibus Objection, you must participate in the Hearing. The Hearing will take place on **April 15, 2025, at 10:00 a.m.** in Courtroom 401, United States Bankruptcy Court, 515 Rusk, 4<sup>th</sup> Floor, Houston, Texas 77002. The Hearing will be a status conference and you may attend in person or virtually.

Audio communication will be by the use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's homepage. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you or your attorney do not take these steps in accordance with the Omnibus Objection Procedures, the Court may decide that you do not oppose the objection to your Claim. Judge Lopez's home page is available here: <a href="https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez">https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez</a>.

Copies of the Omnibus Objection, the Omnibus Objection Procedures, and all other pleadings (the "<u>Pleadings</u>") filed in these bankruptcy cases are available for free at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these bankruptcy cases for a fee at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Public Access to Court Electronic Records ("<u>PACER</u>") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov">http://www.pacer.gov</a>.

Houston, Texas

Dated: February 28, 2025

### /s/ Veronica A. Polnick

### JACKSON WALKER LLP

Matthew D. Cavenaugh (TX Bar No. 24062656) Veronica A. Polnick (TX Bar No. 24079148) Emily Meraia (TX Bar No. 24129307) Zachary McKay (TX Bar No. 24073600) 1401 McKinney Street, Suite 1900

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Counsel to the Wind-Down Debtor

## Exhibit AB

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	) Chapter 11
In re:	
	) Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC, <sup>1</sup>	)
	) (Formerly Jointly Administered under
Wind-Down Debtor.	) Lead Case IEH Auto Parts Holding
	) LLC, Case No. 23-90054)
	)

#### NOTICE OF OBJECTION TO CLAIM

The above-captioned wind-down debtor (the "Wind-Down Debtor" and prior to the Effective Date,<sup>2</sup> the "Debtor"), has filed an objection to the proof of claim you filed in this bankruptcy case (your "Claim" or "Proof of Claim") on the basis that the secured portion of your claim should be (a) it was filed after the applicable bar date as identified on Schedule 1 of the Omnibus Objection, (b) it asserts an amount for which the Wind-Down Debtor is not liable as identified on Schedule 2, (c) it has already been satisfied as identified on Schedule 3, (d) it was filed under an incorrect classification based on applicable law as identified on Schedule 4; (e) it is a duplicate of another claim as identified on Schedule 5, (f) it was satisfied pursuant to the Tax Order as identified on Schedule 6; or (g) it has been partially satisfied as identified on Schedule 7.

Your Claim may be reduced or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. This Notice package includes:

- 1. The Wind-Down Debtors' Ninth Omnibus Objection to Certain Proofs of Claim (Untimely Claim, No Liability Claims, Satisfied Claim, Reclassified Claims, Duplicate Claim, Satisfied Tax Claims, and Partially Satisfied Claims) (the "Omnibus Objection");
  - 2. The Omnibus Objection Procedures;<sup>3</sup>
- 3. A form to complete and deliver to the Wind-Down Debtors' claims agent should you wish to withdraw your Proof of Claim(s); and

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined have the meaning given to them in the *Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Case No. 23-90054, Docket No. 738] (the "Plan").

On August 10, 2023, the Court entered an order [Case No. 23-90054, Docket No. 850] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the "Omnibus Objection Procedures").

### 4. This Notice.

If you do not want the Court to eliminate your Claim, then on or before March 31, 2025 (the "Response Deadline"), you or your lawyer must file a written response (a "Response") in accordance with the Omnibus Objection Procedures. Please review the Omnibus Objection Procedures and follow the instructions for filing Responses to Omnibus Objections to ensure that your Response is timely and correctly filed and served. If you mail your Response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the Response Deadline.

If you disagree with the Omnibus Objection, you must participate in the Hearing. The Hearing will take place on **April 15, 2025, at 10:00 a.m.** in Courtroom 401, United States Bankruptcy Court, 515 Rusk, 4<sup>th</sup> Floor, Houston, Texas 77002. The Hearing will be a status conference and you may attend in person or virtually.

Audio communication will be by the use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's homepage. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you or your attorney do not take these steps in accordance with the Omnibus Objection Procedures, the Court may decide that you do not oppose the objection to your Claim. Judge Lopez's home page is available here: <a href="https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez">https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez</a>.

Copies of the Omnibus Objection, the Omnibus Objection Procedures, and all other pleadings (the "<u>Pleadings</u>") filed in these bankruptcy cases are available for free at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these bankruptcy cases for a fee at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Public Access to Court Electronic Records ("<u>PACER</u>") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov">http://www.pacer.gov</a>.

Date: February 28, 2025

Respectfully submitted,

### TRAN SINGH LLP

/s/Susan Tran Adams

Susan Tran Adams | TBN: 24075648 Brendon Singh | TBN: 24075646 2502 La Branch Street

Houston TX 77004 Ph: (832) 975-7300 Fax: (832) 975-7301 stran@ts-llp.com

Conflicts Counsel to the Wind-Down Debtor

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	
In re:	)	Chapter 11
AUTO PLUS AUTO SALES LLC,	)	Case No. 23-90055 (CML)
Wind-Down Debtor. <sup>1</sup>	) ) ) )	(Formerly Jointly Administered under Lead Case IEH Auto Parts Holding LLC, Case No. 23-90054)

### **CERTIFICATE OF SERVICE**

I, Rigoberto Lopez, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global ("Verita"), the claims and noticing agent for the Wind-Down Debtor in the above-captioned case.

On March 14, 2025, employees of Verita caused the following documents to be served via Electronic Mail upon the service list attached hereto as Exhibit A; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

- Wind Down Debtor's Amended Sixth Omnibus Objection to Certain Proofs of Claim (Assigned Contract Claims, Untimely Claims, No Liability Claims, and Satisfied Claims) [Docket No. 308]
- Notice of Amended Sixth GUC Objection [attached hereto as Exhibit G]
- Omnibus Objection Procedures [attached hereto as Exhibit H]
- Withdrawal of Proof of Claim Form [attached hereto as Exhibit I]

(Continued on Next Page)

<sup>1</sup> On January 16, 2024, the Court entered a Final Decree Closing Certain of the Chapter 11 Cases [Case No. 23-90054, Dkt. No. 10431 closing each Debtor's chapter 11 case except the case of Auto Plus Auto Sales LLC. The

following is a complete list of the Debtor entities in these chapter 11 cases, along with the last four digits of each entity's federal tax identification number: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Wind-Down Debtors' service address is: 5330 Caramel Crest Lane, Charlotte, NC 28226.

Furthermore, on March 14, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service lists attached hereto as **Exhibit C** and **Exhibit D**; and via First Class Mail upon the service lists attached hereto as **Exhibit E** and **Exhibit F**:

• Wind-Down Debtor's Objection to Proof of Claim No. 716 Filed by T and Z Investments I LLC [Docket No. 309]

Dated: March 20, 2025

/s/ Rigoberto Lopez
Rigoberto Lopez
Verita
222 N Pacific Coast Highway,
3rd Floor
El Segundo, CA 90245
Tel 310.823.9000

## Exhibit A

## $\textbf{Casse223990055} \ \ \, \textbf{DDocumeent33637} \ \, \textbf{FillibeldinnTKSSB} \textbf{Boon035222225} \ \, \textbf{Phage} \textbf{4406f322} \\ \textbf{Exhibit A}$

### Sixth Omnibus Claimant Service List Served via Electronic Mail

CreditorName	Email
Edwards, Stephen	Email Redacted

## Exhibit B

## Case-2239900555 Doccumeent 33637 Filided in TXSBB on 03522225 Frage-6606 1322 Exhibit B

### **Sixth Omnibus Claimant Service List Served via First Class Mail**

CreditorName	CreditorName Address1		State	Zip
Edwards, Stephen	Address Redacted			

## **Exhibit C**

## $\textbf{Casse223990555} \quad \textbf{Discourseent 135637} \quad \textbf{Fillibeld rinTXXSBBorn03522.3225} \quad \textbf{Flagge88061322} \\ \textbf{Exhibit C}$

Description	CreditorName	CreditorNoticeName	Email
Bootiption	<u> </u>	STOCKET TO COCK THE	plopez@abernathy-law.com;
			bankruptcy@abernathy-law.com;
Attorneys for Collin CountyTax	Abernathy, Roeder, Boyd & Hullett,	Paul M Lonez Larry R Boyd	lboyd@abernathy-law.com;
Assessor/Collector	P.C.	& Emily M. Hahn	ehahn@abernathy-law.com
Counsel to Bank of America, N.A.	Alston & Bird LLP	Jacob A. Johnson	jacob.johnson@alston.com
Attorneys For The Texas Comptroller Of	Austori & Bird EEI	Oddob 71. dominoch	Jacob.jorinoen@aistern.com
Public Accounts	Attorney General's Office	Bankruptcy & Collections Div.	courtney.hull@oag.texas.gov
Counsel to the Chemours Company FC,	Attorney General's Office	Tobey M. Daluz, Esquire and	daluzt@ballardspahr.com;
LLC	Ballard Spahr LLP	Margaret A. Vesper, Esquire	vesperm@ballardspahr.com
Counsel to RPT Hialeah I, LLC	Barbee & Gehrt, L.L.P.	Jennifer A. Gehrt	jgehrt@bglaw.net
Counsel to National Realty &	baibee & Gellit, L.L.F.	Jennier A. Genit	Jgerii (@bgiaw.riet
	Baralay Daman I I D	Caett I. Eleisaber	official ar@haralaydaman asm
Development Corp.	Barclay Damon LLP	Scott L. Fleischer	sfleischer@barclaydamon.com
Carrage de Consola Amarica dos	Buchalter, A Professional	Character Tan	
Counsel to Oracle America, Inc.	Corporation	Shawn M. Christianson, Esq.	schristianson@buchalter.com
Counsel for Epicor Software			
Corporation & Fidelity and Deposit			
Company of Maryland	Clark Hill PLC	Duane J. Brescia	DBrescia@clarkhill.com
Counsel to Continental Battery		Robert P. Franke and Audrey	bfranke@clarkhill.com;
Company	Clark Hill PLC	L. Hornisher	ahornisher@clarkhill.com
Connecticut Attorney General	Connecticut Attorney General	Attn Bankruptcy Department	attorney.general@ct.gov
Attorneys for Capital Management			
Systems, LLC and EHL Holdings, LLC	Deiches & Ferschmann	A Professional Corporation	ideiches@deicheslaw.com
Delaware Attorney General	Delaware Attorney General	Attn Bankruptcy Department	attorney.general@state.de.us
,	, -	1 7 1	jdreher@downeybrand.com;
Counsel to PW Fund B, LP ("PW			mfrazier@downeybrand.com;
Fund")	Downey Brand LLP	Jamie P. Dreher	courtfilings@downeybrand.com
Counsel to Disney Road Associates,	Downey Brand EEI	Darnie 1 : Brener	courtillings@downcybrand.com
LLC and Fisherbroyles	Fisherbroyles, LLP	Lisa A. Powell	liaa nawall@fiaharbraylaa aam
			lisa.powell@fisherbroyles.com
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	citizenservices@myfloridalegal.com
Counsel to Parts Authority, LLC, Clutch			
Acquisition, LLC, and KPAE Holdco Inc.	Foley & Lardner LLP	Michael Small	msmall@foley.com
Counsel to Environmental			
Management, Inc.	Foley & Lardner LLP	Stephen A. Jones	sajones@foley.com
Counsel to RIDC of Southwestern PA	Fox Rothschild LLP	John R. Gotaskie, Jr.	jgotaskie@foxrothschild.com
Counsel to Standard 5601, LLC,			
Standard 17600, LLC, Standard 2930,			
LLC, Standard 12100, LLC, Standard			
4204, LLC and CCLR, Ltd.,	Frank B. Lyon		frank@franklyon.com
Counsel to Appriss, Inc.	Frost Brown Todd LLP	A.J. Webb, Esq.	awebb@fbtlaw.com
Georgia Attorney General	Georgia Attorney General	Attn Bankruptcy Department	Agcarr@law.ga.gov
,	,	Micheal W. Bishop & Amber	mbishop@grayreed.com;
Counsel to US Pack Parts LLC	Gray Reed	M. Carson	acarson@grayreed.com
Counsel to City of Mesquite	Grimes & Linebarger, LLP	John Kendrick Turner	dallas.bankruptcy@lgbs.com
a commence only comment quite			kmather@gunster.com;
			tkennedy@gunster.com;
Counsel to Ranger FL, LLC	Gunster, Yoakley & Stewart, P.A.	Kenneth G.M. Mather, Esq.	eservice@gunster.com
Counsel to MDH F2 BAL Governor CT,	Hall, Estill, Hardwick, Gable,	Steven W. Soule, OBA No.	555.7100@ganotor.00111
LLC and Ranger FL LLC	Golden & Nelson, P.C.	13781	ssoule@hallestill.com
LLO AND NAMED FL LLO	Goldell & Nelsoll, F.C.		
		Charles A. Beckham, Jr.,	charles.beckham@haynesboone.com;
		Patrick L. Hughes, David	charles.beckham@haynesboone.com;
Counsel to Fisher Auto Parts, Inc.	Haynes And Boone, Llp	Trausch	david.trausch@haynesboone.com
Official Committee of Unsecured			
Creditors	Highline Warren	c/o Anestis Derakis	anestis.derakis@highlinewarren.com
Counsel for 86 Winter Street LLC	Hinckley, Allen & Snyder LLP	Jennifer V. Doran, Esq.	jdoran@hinckleyallen.com
		E. Todd Sable & Lawrence A.	tsable@honigman.com;
Counsel for General Motors LLC	Honigman LLP	Lichtman, Esq.	Ilichtman@honigman.com
Counsel for Axalta Coating Systems,			
LLC	Hunton Andrews Kurth LLP	Justin F. Paget	jpaget@HuntonAK.com
Counsel for Axalta Coating Systems,		Timothy A. ("Tad") Davidson II	taddavidson@HuntonAK.com;
LLC	Hunton Andrews Kurth LLP	& Ashley L. Harper	ashleyharper@HuntonAK.com
Counsel to the Safety National Casualty		, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, , , , , , , , , , , , , , , , , , , ,
Corporation	Husch Blackwell LLP	Buffey E. Klein	Buffey.Klein@huschblackwell.com
Counsel to DRIRITE Tampa	Husch Blackwell LLP	Lynn Hamilton Butler	lynn.butler@huschblackwell.com
Indiana Attorney General	Indiana Attorney General	Attn Bankruptcy Department	info@atg.in.gov
inuiana Allomey General	inularia Allomey General	Aut patividhes peharitietir	iiiiowaiy.iii.yov

## $\textbf{Casse223990055} \ \ \, \textbf{Discourseent 135637} \ \ \, \textbf{Filided in TXXSBB on 103522.3225} \ \ \, \textbf{Flagge e9} of 1322$

Description	CreditorName	CreditorNoticeName	Email
·		Centralized Insolvency	
Internal Revenue Service	Internal Revenue Service	Operation	Mimi.M.Wong@irscounsel.treas.gov
Official Committee of Unsecured			
Creditors	Interstate Batteries, Inc.	c/o Heather Catelotti	heather.catelotti@ibsa.com
Iowa Attorney General	Iowa Attorney General	Attn Bankruptcy Department	IDR.Bankruptcy@ag.iowa.gov
Counsel for Beaver Falls Municipal			
Authority for Itself and as Agent for the			
Bridgewater Township Municipal	I DI II O I o i		
Authority	J. Philip Colavincenzo		jp.cola@verizon.net
Counsel to Cortland Squires LLC	Jaspan Schlesinger Narendran LLP	Sanhia A Darna Blank Eag	anarnanlank@iaananlln aam
Counsel to Official Committee of	LLF	Sophia A. Perna-Plank, Esq.	spernaplank@jaspanllp.com jcoleman@krcl.com;
Unsecured Creditors and the GUC		Joseph M. Coleman, John J.	jkane@krcl.com;
Trust	Kane Russell Coleman Logan PC	Kane & Kyle Woodard	kwoodard@krcl.com
Counsel to Official Committee of	rtario i tassoni solomani Logani i s	rano a rigio rrocana	MY COULT USE IN CIT. CO. IT
Unsecured Creditors and the GUC			
Trust	Kane Russell Coleman Logan PC	Michael P. Ridulfo	mridulfo@krcl.com
	Ţ.		ewilson@kelleydrye.com;
			lschlussel@kelleydrye.com;
Counsel to Standard Motor Products,		Eric R. Wilson, Lauren S.	rbolger@kelleydrye.com;
Inc.	Kelley Drye & Warren LLP	Schlussel & Ryan T. Bolger	kdwbankruptcydepartment@kelleydrye.com
Counsel to Byzantine Inc. and			
Duquesne Light Company	Keri P. Ebeck	Bernstein-Burkley, P.C.	kebeck@bernsteinlaw.com
			chad.husnick@kirkland.com;
Counsel to DRiV Automotive Inc.	Kirkland & Ellis LLP	J. Wirtz	alison.wirtz@kirkland.com
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Company	Langley LLP	Keith A Langley	klangley@l-llp.com
Coupagi to City of El Book	Linebarger Goggan Blair & Sampson, LLP	Don Stecker	canantania hankruntav@laha cam
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Galveston County, Texas City ISD, Fort			
Bend County & Fort Bend Co WCID#	Linebarger Goggan Blair &		
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Massachusetts Attorney General	Massachusetts Attorney General	Attn Bankruptcy Department	ago@state.ma.us
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Minnesota Attorney General	Minnesota Attorney General	Attn Bankruptcy Department	ag.replies@ag.state.mn.us
Mississippi Attorney General	Mississippi Attorney General	Attn Bankruptcy Department	fhell@ago.ms.gov
Missouri Attorney General	Missouri Attorney General	Attn Bankruptcy Department	attorney.general@ago.mo.gov
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and Westphalia Venture, LLC	Munsch Hardt Kopf & Harr, P.C.	P. White	cwhite@munsch.com
, , -	Nelson Mullins Riley &		<del>`</del>
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## $\textbf{Casse223990055} \ \ \, \textbf{Discourmeent 1351637} \ \ \, \textbf{Fillidecld ninTFXSSEBoon 03522.2225} \ \ \, \textbf{Fillidecld ninTFXSSEBoon 03522.2225} \\ \ \, \textbf{Exhibit C}$

Description	Cuaditauklama	Cuaditaublatiaablama	Email
Description Office of the LLC Trustee	CreditorName	CreditorNoticeName	Email
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Pennsylvania Attorney General	Pennsylvania Attorney General	Attn Bankruptcy Department	info@attorneygeneral.gov
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Drainage District # 4, Special Road and	5 . 5 . 5 6		
Bridge District, Pearland Independent	Perdue, Brandon, Fielder, Collins		
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District, Vernon College and Wilbarger	Perdue, Brandon, Fielder, Collins		
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			jhiggins@porterhedges.com;
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Distributors, Inc	Schiffman, Sheridan & Brown, PC	J. Schiffman, Esq	sschiffman@ssbc-law.com
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Securities and Exchange Commission	Securities and Exchange	g	gg
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Texas Attorney General	Texas Attorney General Texas Commission on	ашт ванктирксу Берагипепт	communications@oag.texas.gov
Toyon State FDA Assessed	_	Office of the Commission	info@toog toyon may
Texas State EPA Agency	Environmental Quality	Office of the Commissioner	info@tceq.texas.gov
Committee Of the	T 0 (O) (	Attn Corporate Bankruptcy	
Secretary of the State	Texas Secretary of State	Dept	secretary@sos.texas.gov
The Pep Boys – Manny, Moe & Jack	The Pep Boys – Manny, Moe &	Daniel Marraia (19)	dan manaisalan On anh
LLC	Jack LLC	Donald Novajosky	don_novajosky@pepboys.com
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United States Attorney Office for the	US Attorney Office, Southern		usatxs.bankruptcy@usdoj.gov;
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	US Trustee for the Southern		
Office of the U.S. Trustee for the	District of Texas (Houston		
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West Virginia Attorney General	West Virginia Attorney General	Attn Bankruptcy Department	consumer@wvago.gov
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## $\textbf{Casse223990055} \ \ \, \textbf{Discourmeent 1351637} \ \ \, \textbf{Fillidecld ninTFXSSEBoon 03522.2225} \ \ \, \textbf{Fillidecld ninTFXSSEBoon 03522.2225} \\ \ \, \textbf{Exhibit C}$

Description	CreditorName	CreditorNoticeName	Email
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Counsel for HNP Investments LLC	Wolcott Rivers Gates	Carl A. Eason, Esq	bankruptcy@wolriv.com
		Brian D. Womac & Stacey L.	brian@womaclaw.com;
Attorneys for GKI Infill Philadelphia, LL	C Womac Law	Kremling	stacey@womaclaw.com

# Exhibit D

## $\textbf{Casse223990055} \ \ \, \textbf{Discounseent 135637} \ \ \, \textbf{Ffilidecld rinTTXSSEBoor 103522.2225} \ \ \, \textbf{Pragge=1.8306f322} \\ \textbf{Exhibit D}$

### T and Z Investments, I LLC Service List Served via Electronic Mail

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## **Exhibit E**

## Case 22399055 Diocomment 35637 Filide drint XSSB on 03522225 Filide 15506322 Exhibit E

#### Master Service List Served via First Class Mail

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LLC	Ballard Spahr LLP	Margaret A. Vesper, Esquire	Floor			Wilmington	DE	19801-3034
	Danara Spain 22.	Donald K. Ludman and Julie F.				· · · · · · · · · · · · · · · · · · ·	-	
Attorneys for SAP America, Inc.	Brown & Connery, LLP	Montgomery	100			Woodbury	NJ	08096
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Counsel to Gradie 7 therica, me.	Corporation	Robert P. Franke and Audrey	2000			Garriranoisco	0,1	34100 0400
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	Delaware Attorney General	Attn Bankruptcy Department	Carvel State Office Bldg.	820 N. French St.		Wilmington	DE	19801
Delaware Automey General	Department of Justice US Attorney	Attir Bankruptey Department	Carver State Office Blug.	020 IV. I TOTICIT OL.		vviiiiiiigtoii	DL	13001
US Department of Justice	General	Commercial Litigation Branch	950 Pennsylvania Ave NW			Washington	DC	20530
	Florida Attorney General	Attn Bankruptcy Department	The Capitol PL-01			Tallahassee	FL	32399-1050
Georgia Attorney General	Georgia Attorney General	Attn Bankruptcy Department	40 Capital Square, SW			Atlanta	GA	30334-1300
Georgia Attorney General	Georgia Attorney General	Atti Bankruptcy Department	401 E. Jackson Street. Suite			Aliania	GA	30334-1300
Coursel to Denner Fl. LLC	Curatar Vaciday & Stayyart D.A	Kenneth G.M. Mather, Esq.	1500			T	FL	22602
Counsel to Ranger FL, LLC	Gunster, Yoakley & Stewart, P.A.	Charles A. Beckham, Jr.,	1500			Tampa	FL	33602
		- ,	1001 M-Kinner Other t Onite					
O	Harman And Danie I In	Patrick L. Hughes, David	1221 McKinney Street, Suite				TV	77040
Counsel to Fisher Auto Parts, Inc.	Haynes And Boone, Llp	Trausch	4000			Houston	TX	77010
Official Committee of Unsecured			450044					00110
Creditors	Highline Warren	c/o Anestis Derakis	4500 Malone Rd., Ste. 1			Memphis	TN	38118
Illinois Attorney General	Illinois Attorney General	Attn Bankruptcy Department	100 West Randolph Street			Chicago	IL	60601
				302 West				
Indiana Attorney General	Indiana Attorney General	Attn Bankruptcy Department	Indiana Govt Center South	Washington St 5th FI		Indianapolis	IN	46204
		Centralized Insolvency						
Internal Revenue Service	Internal Revenue Service	Operation	PO Box 7346			Philadelphia	PA	19101-7346
Official Committee of Unsecured			14221 N. Dallas Pkwy, Ste.					
Creditors	Interstate Batteries, Inc.	c/o Heather Catelotti	1000			Dallas	TX	75254
				1305 E. Walnut				
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Counsel to Cypress-Fairbanks ISD,								
Montgomery County, Harris County,								
Galveston County, Texas City ISD, Fort	Linebarger Goggan Blair &							
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Massachusetts Attorney General	Massachusetts Attorney General	Attn Bankruptcy Department	One Ashburton Place			Boston	MA	02108-1518
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	Missouri Attorney General	Attn Bankruptcy Department	Supreme Court Bldg	207 W. High St.		Jefferson City	МО	65101
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, ,		. , .	Richard J. Hughes Justice					
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, , , , , , , , , , , , , , , , , , , ,	· ,,	, , = -p	Office of the Attorney				T -	
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IINEW TOIK ALLOTTIEV GETIETAL								

### 

#### Master Service List Served via First Class Mail

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,	,	. , .	16th Floor, Strawberry			,		
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Securities and Exchange Commission	Securities and Exchange							
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Counsel to American Entertainment		Stephen E. Hessler & Anthony						
Properties Corp.	Sidley Austin LLP	R. Grossi	787 Seventh Avenue			New York	NY	10019
Counsel to the Proposed DIP Lender &								
Counsel to American Entertainment		Stephen E. Hessler & Anthony						
Properties Corp.	Sidley Austin LLP	R. Grossi	787 Seventh Avenue			New York	NY	10019
			Rembert C. Dennis Office	1000 Assembly St				
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			411 East Franklin Street,					
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Official Committee of Unsecured								
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Tennessee Attorney General	Tennessee Attorney General	Attn Bankruptcy Department	425 5th Avenue North			Nashville	TN	37243
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	300 W. 15th St			Austin	TX	78701
	Texas Commission on							
Texas State EPA Agency	Environmental Quality	Office of the Commissioner	12100 Park 35 Circle			Austin	TX	78753
		Attn Corporate Bankruptcy						
Secretary of the State	Texas Secretary of State	Dept	PO Box 13697			Austin	TX	78711-3697
United States Attorney Office for the	US Attorney Office, Southern							
Southern District of Texas	District of Texas	Daniel D. Hu	1000 Louisiana, Suite 2300			Houston	TX	77002
	US Customs and Border							
US Customs and Border Protection	Protection		1300 Pennsylvania Ave. NW			Washington	DC	20229
	US Environmental Protection							
Environmental Protection Agency (US)	Agency		1200 Pennsylvania Ave NW	Ariel Rios Building		Washington	DC	20004
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			State Capitol Bldg 1 Rm E-	1900 Kanawha Blvd.,				
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·				114 East, State	PO Box			
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## **Exhibit F**

## Case 223990555 Document 35637 Filideld nin TXSSB on 03522.2225 Filide 1880 6322 Exhibit F

### T and Z Investments, I LLC Service List Served via First Class Mail

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T and Z Investments, I LLC	c/o Velocity Venture Partners LLC	Legal Department	One Belmont Ave Suite 520	Bala Cynwyd	PA	19004

## **Exhibit G**

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

) Chapter 11	
In re:	
) Case No. 23-90055 (CML)	
AUTO PLUS AUTO SALES LLC, <sup>1</sup>	
) (Formerly Jointly Administered	under
Wind-Down Debtor. ) Lead Case IEH Auto Parts Hold	ing
) LLC, Case No. 23-90054)	
)	

#### NOTICE OF OBJECTION TO CLAIM

The above-captioned wind-down debtor (the "Wind-Down Debtor" and prior to the Effective Date,<sup>2</sup> the "Debtor"), has filed an objection to the proof of claim you filed in this bankruptcy case (your "Claim" or "Proof of Claim") on the basis that the secured, administrative, or priority portion of your claim should be disallowed because (a) it was satisfied or released during the chapter 11 cases in connection with the assumption of a contract or lease pursuant to the Plan or a court order as identified on Schedule 1 of the Omnibus Objection, (b) it was filed after the applicable bar date as identified on Schedule 2 of the Omnibus Objection, (c) it asserts an amount for which the Wind-Down Debtor is not liable as identified on Schedule 3 of the Omnibus Objection, or (d) it has already been satisfied as identified on Schedule 4 of the Omnibus Objection.

Your Claim may be reduced or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one. This Notice package includes:

- 1. The Wind-Down Debtor's Amended Sixth Omnibus Objection to Certain Proofs of Claim (Assigned Contract Claims, Untimely Claims, No Liability Claims, and Satisfied Claims) (the "Omnibus Objection");
  - 2. The Omnibus Objection Procedures;<sup>3</sup>
- 3. A form to complete and deliver to the Wind-Down Debtors' claims agent should you wish to withdraw your Proof of Claim(s); and

The Wind-Down Debtor's service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor's claims and noticing agent at <a href="https://www.kcellc.net/autoplus">https://www.kcellc.net/autoplus</a>.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined have the meaning given to them in the *Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Case No. 23-90054, Docket No. 738] (the "Plan").

On August 10, 2023, the Court entered an order [Case No. 23-90054, Docket No. 850] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the "Omnibus Objection Procedures").

#### 4. This Notice.

If you do not want the Court to reduce or eliminate your Claim, then on or before April 14, 2025 (the "Response Deadline"), you or your lawyer must file a written response (a "Response") in accordance with the Omnibus Objection Procedures. Please review the Omnibus Objection Procedures and follow the instructions for filing Responses to Omnibus Objections to ensure that your Response is timely and correctly filed and served. If you mail your Response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the Response Deadline.

If you disagree with the Omnibus Objection, you must participate in the Hearing. The Hearing will take place on **April 15, 2025, at 10:00 a.m.** in Courtroom 401, United States Bankruptcy Court, 515 Rusk, 4<sup>th</sup> Floor, Houston, Texas 77002. The Hearing will be a status conference and you may attend in person or virtually.

Audio communication will be by the use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's homepage. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's homepage. Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you or your attorney do not take these steps in accordance with the Omnibus Objection Procedures, the Court may decide that you do not oppose the objection to your Claim. Judge Lopez's home page is available here: <a href="https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez">https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-christopher-m-lopez</a>.

Copies of the Omnibus Objection, the Omnibus Objection Procedures, and all other pleadings (the "Pleadings") filed in these bankruptcy cases are available for free at <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these bankruptcy cases for a fee at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov.">http://www.pacer.gov.</a>

Houston, Texas

Dated: March 14, 2025

### /s/ Veronica A. Polnick

### JACKSON WALKER LLP

Matthew D. Cavenaugh (TX Bar No. 24062656) Veronica A. Polnick (TX Bar No. 24079148) Emily Meraia (TX Bar No. 24129307) Zachary McKay (TX Bar No. 24073600) 1401 McKinney Street, Suite 1900

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vpolnick@jw.com emeraia@jw.com zmckay@jw.com

Counsel to the Wind-Down Debtor

## **Exhibit H**

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	)	
In re:	)	Chapter 11
	)	
IEH AUTO PARTS HOLDING LLC, et al., 1	)	Case No. 23-90054 (CML)
,	)	,
Debtors.	)	(Jointly Administered)
	)	,

### PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

- 1. <u>Grounds for Omnibus Objections</u>. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Debtors<sup>2</sup> may file omnibus objections (each, an "<u>Omnibus Objection</u>") to Claims on the grounds (the "<u>Additional Grounds</u>") that such Claims, in part or in whole:
  - a. fail to specify the asserted Claim amount (or only list the Claim amount as "unliquidated");
  - b. seek recovery of amounts for which the Debtors are not liable;
  - c. are satisfied by payment in full or in part on account of such Claim from a party that is not a debtor, including one or more of the Debtors' insurers;
  - d. are incorrectly or improperly classified;
  - e. are filed against non-Debtors, the incorrect Debtor, or multiple Debtors;
  - f. fail to specify a Debtor against which the Claim is asserted;
  - g. are disallowed or subordinated to all Claims senior to or equal to the asserted Claim arising out of the purchase or sale of a security of the Debtor or affiliate pursuant to section 510(b) of the Bankruptcy Code;

The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

- h. are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan; or
- i. have not been timely filed by parties to prepetition litigation with the Debtors.
- 2. <u>Form of Omnibus Objection</u>. Each Omnibus Objection will be numbered consecutively, regardless of basis. The Claims subject to the Omnibus Objection will be listed alphabetically by claimant on the schedules attached to each Omnibus Objection.
- 3. <u>Supporting Documentation</u>. In accordance with Local Bankruptcy Rule 3007-1, Omnibus Objections must include an affidavit or declaration signed by a person with personal knowledge supporting the objection.
- 4. <u>Claims Exhibits</u>. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which there is a common basis for the objection. Claims for which there is more than one basis for the objection will be referenced on each exhibit applicable thereto. Including a Claim on one exhibit will not constitute a waiver of the Debtors' right to object to the Claim on an additional basis or bases. The exhibits will include, without limitation, the following information:
  - a. the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number(s) related thereto from the claims register;
  - b. the asserted amount of the Claim;
  - c. the grounds for the objection; and
  - d. other information, as applicable, including: (i) the proposed classification of Claims the Debtors seek to reclassify; (ii) the proposed allowed Claim amounts of claims the Debtors seek to reduce; and/or (iii) the surviving Claims, if any, of claimants affected by the Omnibus Objection.
- 5. <u>Objection Notice</u>. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as **Exhibit 2** (the "Objection Notice"), which will:
  - a. describe the basic nature of the objection;
  - b. inform creditors how to file a written response (each, a "Response") to the objection;
  - c. identify the hearing date, if applicable, and information on how to participate; and
  - d. describe how copies of proofs of claim, the Omnibus Objection, and other pleadings filed in the chapter 11 cases may be obtained.

- 6. <u>Notice and Service</u>. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice and these Procedures) will be mailed to each claimholder that is subject to such objection.
- 7. Omnibus Claims Objection Hearings. Each Omnibus Objection shall be set for hearing no less than 30 days after service of the Omnibus Objection (each, a "Hearing"), unless otherwise ordered by the Court. For all Hearings:
  - a. Unless agreed to by the Debtors and the claimant, or otherwise ordered by the Court, the first hearing on any Omnibus Objection shall be a non-evidentiary status conference.
  - b. Upon no less than 10 days' notice, the Debtors, or any claimant that has filed a timely response, may file a motion to continue any Hearing.
  - c. By agreement (email being sufficient), the Debtors and claimants may agree to reset any Hearing with respect to any Claim.
- 8. <u>Hearing Participation</u>. The first Hearing on an Omnibus Objection shall be a status conference and shall be a virtual hearing consistent with section I of the Complex Procedures (i.e., no in-person participation will be permitted). Unless otherwise ordered by the Court, all subsequent Hearings on an Omnibus Objection will be remote hearings consistent with section H of the Complex Procedures (i.e., all parties may elect to appear either in person or virtually). Instructions for appearing at the Hearing shall be included on the first page of each Omnibus Objection.
- 9. <u>Contested Matter</u>. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim.

### **Responses to Omnibus Objections**

- 10. Parties Required to File a Response. Any party who disagrees with an Omnibus Objection is required to file a Response in accordance with the procedures set forth herein and to appear at the Hearing(s) with respect to their Claim. If a claimant whose Claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below or fails to appear at the Hearing(s), the Court may grant the relief requested in the Omnibus Objection with respect to such Claim without further notice to the claimant.
- 11. <u>Failure to Respond</u>. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. **Absent reaching an agreement with the Debtors resolving the objection to a Claim, failure to timely file and serve a Response as set forth herein or to appear at the Hearing(s) may result in the Court**

**granting the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

- 12. <u>Response Contents</u>. Each Response must contain the following (at a minimum):
  - a. This case caption:<sup>3</sup>

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION		
In re:	)	Chapter 11
AUTO PLUS AUTO SALES LLC,	)	Case No. 23-90055 (CML)
Wind-Down Debtor. <sup>1</sup>	) ) )	(Formerly Jointly Administered under Lead Case IEH Auto Parts Holding LLC, Case No. 23-90054)

- b. The responding party's name and the number of the Omnibus Objection to which the Response is directed,
- c. The factual basis and specific reasons for disagreement with the Omnibus Objection;
- d. If applicable, the Proof of Claim number(s) from the Claims Register to which the Response relates; and
- e. The following contact information for the responding party:
  - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.
- 13. <u>Filing and Service of the Response</u>. A Response will be deemed timely only if it is filed with the Court and served electronically using the Court's electronic filing system and

In re: Auto Plus Auto Sales, LLC.

The Debtors may revise these procedures for service purposes to include the case caption of a remaining case in the event that Case No. 22-90054 is closed in the future.

Case No. 22-90054 was closed on January 16, 2024, pursuant to the Court's *Final Decree Closing Certain of the Chapter 11 Cases* [Case No. 23-90054, Dkt. #1043]. All Responses should be filed in Case No. 23-90055 styled

actually received on the response date specified in the Objection Notice (the "Response Deadline") by the following parties (the "Notice Parties"):

#### 1) Debtors' counsel:

Jackson Walker LLP

1401 McKinney Street, Suite 1900

Houston, TX 77010

Attention: Matthew Cavenaugh

Veronica A. Polnick Zachary McKay Vienna F. Anaya Emily Flynn Meraia

E-mail: mcavenaugh@jw.com

vpolnick@jw.com zmckay@jw.com vanaya@jw.com emeraia@jw.com

- and -

Law Office of Liz Freeman

PO Box 61209

Houston, TX 77208

Attention: Elizabeth C. Freeman

Email: liz@lizfreemanlaw.com

### 2) The U.S. Trustee:

**Hector Duran** 

Stephen Statham

Office of the United States Trustee for the Southern District of Texas

515 Rusk St, Ste. 3516

Houston, Texas 77002

hector.duran.jr@usdoj.com

stephen.statham@usdoj.com

### 3) Counsel to the Unsecured Creditors' Committee GUC Trustee:

Joseph M. Coleman

John J. Kane

Kyle Woodard

KANE RUSSELL COLEMAN LOGAN PC

Bank of America Plaza

901 Main Street, Suite 5200

Dallas, Texas 75202

(214) 777-4200

jcoleman@krcl.com jkane@krcl.com kwoodard@krcl.com

- and -

Michael D. Warner PACHULSKI STANG ZIEHL & JONES LLP 440 Louisiana Street, Suite 900 Houston, TX 77002 (713) 691-9385 mwarner@pszjlaw.com

If you do not have electronic filing privileges, you must also mail your Response to the Court, such that it is received by the Response Deadline, at:

Nathan Oschner Clerk of Court 515 Rusk Street, 5<sup>th</sup> Floor Houston, Texas 77002

- 14. <u>Informal Resolution</u>. Parties to an Omnibus Objection may engage in settlement discussions to resolve the matter without the need for a hearing. The Debtors may utilize Rule 68 of the Federal Rules of Civil Procedure with respect to Omnibus Objections, as modified by this paragraph 14. Rule 68 provides, in pertinent part:
  - (a) MAKING AN OFFER; JUDGMENT ON AN ACCEPTED OFFER. At least 14 days before the date set for trial, a party objecting to a claim may serve on an opposing party an offer to allow judgment on specified terms, with the costs then accrued. If, within 14 days after being served, the opposing party serves written notice accepting the offer, either party may then file the offer and notice of acceptance, plus proof of service. The clerk must then enter judgment.
  - (b) UNACCEPTED OFFER. An unaccepted offer is considered withdrawn, but it does not preclude a later offer. Evidence of an unaccepted offer is not admissible except in a proceeding to determine costs.

\* \* \*

(d) PAYING COSTS AFTER AN UNACCEPTED OFFER. If the judgment that the offeree finally obtains is not more favorable than the unaccepted offer, the offeree must pay the costs incurred after the offer was made.

The Debtors will not utilize Rule 68 against unrepresented parties. Rule 68(d) is further modified such that if the ruling finally obtained is not more favorable to the offeree than the unaccepted offer, the Debtors may seek reimbursement of costs incurred after the offer was made.

### **Miscellaneous**

- 15. <u>Additional Information</u>. Copies of these procedures, the Motion, the Order or any other pleadings (the "<u>Pleadings</u>") filed in these chapter 11 cases are available at no cost at the Debtors' restructuring website <a href="https://www.kccllc.net/autoplus">https://www.kccllc.net/autoplus</a>. You may also obtain copies of any of the Pleadings filed in these chapter 11 cases for a fee at the Court's website at <a href="https://ecf.txsb.uscourts.gov/">https://ecf.txsb.uscourts.gov/</a>. A login identification and password to the Court's Public Access to Court Electronic Records ("<u>PACER</u>") are required to access this information and can be obtained through the PACER Service Center at <a href="http://www.pacer.gov">http://www.pacer.gov</a>.
- Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A WAIVER OF ANY RIGHT OF ANY DEBTOR TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO BANKRUPTCY CODE SECTION 365; OR (F) A WAIVER OF ANY RIGHT OF ANY DEBTOR UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

## **Exhibit I**

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

	<del></del> _
In re:	) Chapter 11
IEH AUTO PARTS HOLDING LLC, et al.,1	) Case No. 23-90054 (CML)
Debtors.	) (Jointly Administered)
WITHDRAWAL OF PROC	OF OF CLAIM NO
Claimant,	[Claimant Name(s)],
hereby withdraws with prejudice its proof of clair	m No[Claim Number(s)].
Signed:	
Print Name	o:
Title:	
Claimant Name:	
Address:	Please mail this form via U.S. Mail to:  IEH Auto Parts Holding LLC
Address:	Claims Processing Contor
City, State, Zip:	222 N Pacific Coast Highway Suite 300
Phone:	01, 3 00 11103 0111011 0
Email:	autoplusinfo@kccllc.com 

The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors' service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.