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 JUNE 17, 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 June 17, 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 1. Debtor IEH Auto Parts, LLC;
- 2. Any witness listed or called by any other party;
- 3. Rebuttal witnesses as necessary; and
- The Debtors reserves the right to cross examine any witness called by any 4. 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 https://www.kccllc.net/autoplus.

EXHIBITS

| EXHIBIT | DESCRIPTION | MARK | OFFER | OBJECT | ADMIT | W/D | DISPOSITION AFTER TRIAL |
|---------|--|------|-------|--------|-------|-----|----------------------------|
| 1. | Declaration of Susanne Edwards in Support of Wind-Down Debtor's Amended Objection to Proof of Claim No. 716 filed by T and Z Investments I LLC [Docket No. 346, Ex. A] | | | | | | |
| 2. | Proof of Claim filed No. 716 filed by T and Z Investments, I LLC [Docket No. 346, Ex. B] | | | | | | |
| 3. | Certificate of Service [Docket No. 351] | | | | | | |
| | 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: June 13, 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 June 13, 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

Edwards 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 |) | |
| W 1D D1 |) | (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 AMENDED OBJECTION TO PROOF OF CLAIM NO. 716 FILED BY T AND Z INVESTMENTS I LLC

- 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 Amended Objection to Proof of Claim No. 716 Filed by T and Z Investments I LLC* (the "Objection")² and I have reviewed the Claim and related attachments.

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 https://www.kccllc.net/autoplus.

² Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

Case 23-90055 Document 346-1Fileded iTXISBS@nc05069129625Pagae0e43c623

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

register, the Claim, as well as any supporting documentation, and the Wind-Down Debtor's books

and records and determined that the Claim should be reclassified in part as requested in the

Objection.

4. The Claim asserts (1) January 2023 CAM in the amount of \$2,630.83 and (2) 2022

CAM recon in the amount of \$35,931.13, both of which relate to periods prior to the Petition Date.

The Claim also asserts 2023 Special Assessment in the amount of \$70,321.95, which the

Wind-Down Debtors do not have a record of and do not believe is collectible under the Lease.

Accordingly, I believe that the reclassification of \$38,561.96 of the Priority Claim and

disallowance of \$70,321.95 of the Priority Claim on the terms set forth in the Objection is

appropriate. It is my belief that if the Claim is not reclassified in part and disallowed in part, the

Claimant may stand to recover from the Wind-Down Debtor's estate improperly.

5. 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 belief as of the date hereof.

Dated: May 15, 2025

/s/ Susanne Edwards

Susanne Edwards

2

Exhibit B

Proof of Claim No. 716

| Fill in this information to identify the case: | | | | | | | |
|--|-----------------------------------|--------------------------|--|--|--|--|--|
| Debtor | IEH Auto Parts LLC | | | | | | |
| United States Ba | ankruptcy Court for the: Southern | District of Texas(State) | | | | | |
| Case number | 23-90057 | | | | | | |

Official Form 410

Proof of Claim 04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

| P | art 1: Identify the Clair | n | | | | | | | | | |
|----|--|--|---|--|--|--|--|--|--|--|--|
| 1. | Who is the current creditor? | T and Z Investments, I LLC Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor | | | | | | | | | |
| 2. | Has this claim been acquired from someone else? | ✓ No Yes. From whom? | | | | | | | | | |
| 3. | Where should notices and | Where should notices to the creditor be sent? | Where should payments to the creditor be sent? (if different) | | | | | | | | |
| | payments to the creditor be sent? | See summary page | , | | | | | | | | |
| | Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) | | | | | | | | | | |
| | | Contact phone 610-382-5400 Contact email legal@velocityinv.com | Contact phone Contact email | | | | | | | | |
| | | Uniform claim identifier for electronic payments in chapter 13 (if you use o | one): | | | | | | | | |
| 4. | Does this claim amend one already filed? | ✓ No✓ Yes. Claim number on court claims registry (if known) | Filed on | | | | | | | | |
| 5. | Do you know if anyone else has filed a proof of claim for this claim? | No Yes. Who made the earlier filing? | | | | | | | | | |

Official Form 410 **Proof of Claim**

| Pa | Give Information Ab | out the Claim as of the Date the Case Was Filed |
|-----|---------------------------------|--|
| 6. | , | ☑ No |
| | you use to identify the debtor? | Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: |
| 7. | How much is the claim? | \$ 183,700.47 Does this amount include interest or other charges? No Yes. Attach statement itemizing interest, fees, expenses, or other |
| | | charges required by Bankruptcy Rule 3001(c)(2)(A). |
| 8. | What is the basis of the claim? | Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. |
| | | Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). |
| | | Limit disclosing information that is entitled to privacy, such as health care information. |
| | | Postpetition Occupancy Costs and Rejection Damages |
| 9. | Is all or part of the claim | □ No |
| | secured? | ✓ Yes. The claim is secured by a lien on property. |
| | | Nature or property: |
| | | <u> </u> |
| | | Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . |
| | | Motor vehicle |
| | | Other Describe: Right of setoff |
| | | Basis for perfection: |
| | | Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) |
| | | Value of property: \$ <u>14043.74</u> |
| | | Amount of the claim that is secured: \$\frac{14043.74}{} |
| | | Amount of the claim that is unsecured: \$\frac{169656.73}{}\$ (The sum of the secured and unsecured amount should match the amount in line 7.) |
| | | Amount necessary to cure any default as of the date of the petition: \$ |
| | | Annual Interest Rate (when case was filed)% Fixed |
| | | Variable |
| 10 | Is this claim based on a | ☑ No |
| | lease? | Yes. Amount necessary to cure any default as of the date of the petition. |
| 11. | Is this claim subject to a | □ No |
| | right of setoff? | Yes. Identify the property: credit on account as of petition date |
| | | |

Official Form 410 Proof of Claim

Case 23-90055 Document 346-2Fileideid iTXIS4S@no05066128525Pa@agte84o6f23

| 12. Is all or part of the claim entitled to priority under | ☐ No | | | | | | | | | |
|---|--|--|-------------------------------------|--|--|--|--|--|--|--|
| 11 U.S.C. § 507(a)? | Yes. Ch | eck all that apply: | Amount entitled to priority | | | | | | | |
| A claim may be partly priority and partly | | nestic support obligations (including alimony and child support) under J.S.C. § 507(a)(1)(A) or (a)(1)(B). | ¢ | | | | | | | |
| nonpriority. For example, in some categories, the law limits the amount | | to \$3,350* of deposits toward purchase, lease, or rental of property services for personal, family, or household use. 11 U.S.C. § 507(a)(7). | \$ | | | | | | | |
| entitled to priority. | | ges, salaries, or commissions (up to \$15,150*) earned within 180 | Ψ | | | | | | | |
| | — day | s before the bankruptcy petition is filed or the debtor's business ends, chever is earlier. 11 U.S.C. § 507(a)(4). | \$ | | | | | | | |
| | ☐ Tax | es or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). | \$ | | | | | | | |
| | ☐ Cor | ntributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). | \$ | | | | | | | |
| | Oth | er. Specify subsection of 11 U.S.C. § 507(a)(2_) that applies. | \$ <u>130522.66</u> | | | | | | | |
| | * Amour | ts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun | on or after the date of adjustment. | | | | | | | |
| 13. Is all or part of the claim pursuant to 11 U.S.C. | ✓ No | | | | | | | | | |
| § 503(b)(9)? | days be | licate the amount of your claim arising from the value of any goods rec fore the date of commencement of the above case, in which the goods nary course of such Debtor's business. Attach documentation supporting | have been sold to the Debtor in | | | | | | | |
| | \$ | | | | | | | | | |
| Part 3: Sign Below | | | | | | | | | | |
| | 01 1 11 | | | | | | | | | |
| The person completing this proof of claim must | Check the appro | opriate box: | | | | | | | | |
| sign and date it. | I am the creditor. | | | | | | | | | |
| FRBP 9011(b). | I am the creditor's attorney or authorized agent. | | | | | | | | | |
| If you file this claim electronically, FRBP | I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004. | | | | | | | | | |
| 5005(a)(2) authorizes courts to establish local rules specifying what a signature | I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005. | | | | | | | | | |
| is. A person who files a | I understand that an authorized signature on this <i>Proof of Claim</i> serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt. | | | | | | | | | |
| fraudulent claim could be fined up to \$500,000, | I have examined the information in this <i>Proof of Claim</i> and have reasonable belief that the information is true and correct. | | | | | | | | | |
| imprisoned for up to 5 years, or both. | I declare under | penalty of perjury that the foregoing is true and correct. | | | | | | | | |
| 18 U.S.C. §§ 152, 157, and 3571. | Executed on da | te <u>08/16/2023</u> MM / DD / YYYY | | | | | | | | |
| | | | | | | | | | | |
| | /s/Zachary Signature | Moore | | | | | | | | |
| | Print the name | of the person who is completing and signing this claim: | | | | | | | | |
| | Name | Zachary Moore First name Middle name Last I | | | | | | | | |
| | | | name | | | | | | | |
| | Title | Authorized Signatory | | | | | | | | |
| | Company | T and Z Investments I LLC Identify the corporate servicer as the company if the authorized agent is a servicer | | | | | | | | |
| | Address | | | | | | | | | |
| | | | | | | | | | | |
| | Contact phone | Email | | | | | | | | |

Official Form 410 **Proof of Claim**

Case 23-90055 Document 346-2Fileid in XISES And SUBJECT AREA 1950 128 KCC ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (888) 802-7207 | International (781) 575-2107

| Debtor: | | , , | | | | | |
|--|-------------------------------|--|--|--|--|--|--|
| 23-90057 - IEH Auto Parts LLC | | | | | | | |
| District: | | | | | | | |
| Southern District of Texas, Houston Division | | | | | | | |
| Creditor: | Has Supporting Doc | umentation: | | | | | |
| T and Z Investments, I LLC | | ng documentation successfully uploaded | | | | | |
| Legal Department c/o Velocity Venture Partners LLC | Related Document Statement: | | | | | | |
| One Belmont Ave. | Has Related Claim: | | | | | | |
| Suite 520 | | | | | | | |
| Bala Cynwyd, PA, 19004 | No | | | | | | |
| US | Related Claim Filed | Ву: | | | | | |
| Phone: | Filing Party: | | | | | | |
| 610-382-5400 | Authorized ag | ent | | | | | |
| Phone 2: | Aditionzed ag | Cit | | | | | |
| | | | | | | | |
| Fax: | | | | | | | |
| Email: | | | | | | | |
| legal@velocityinv.com | | | | | | | |
| Other Names Used with Debtor: | Amends Claim: | | | | | | |
| | No | | | | | | |
| | Acquired Claim: | | | | | | |
| | No | | | | | | |
| Basis of Claim: | Last 4 Digits: | Uniform Claim Identifier: | | | | | |
| Postpetition Occupancy Costs and Rejection Damages | No | | | | | | |
| Total Amount of Claim: | Includes Interest or Charges: | | | | | | |
| 183,700.47 | Yes | | | | | | |
| Has Priority Claim: | Priority Under: | | | | | | |
| Yes | 11 U.S.C. §50 | 7(a)(2): 130522.66 | | | | | |
| Has Secured Claim: | Nature of Secured A | mount: | | | | | |
| Yes: 14043.74 | Other | | | | | | |
| Amount of 503(b)(9): | Describe: Rig | ht of setoff | | | | | |
| No | Value of Property: | | | | | | |
| Based on Lease: | 14043.74 | | | | | | |
| No | Annual Interest Rate | : | | | | | |
| Subject to Right of Setoff: | Arrearage Amount: | | | | | | |
| Yes, credit on account as of petition date | Basis for Perfection: | | | | | | |
| | | • | | | | | |
| | Amount Unsecured: | | | | | | |
| Submitted Du | 169656.73 | | | | | | |
| Submitted By: Zachary Moore on 16-Aug-2023 2:37:37 p.m. Eastern Tim | 0 | | | | | | |
| Zachary Moore on 16-Aug-2023 2:37:37 p.m. Eastern 11m Title: | C | | | | | | |
| Authorized Signatory | | | | | | | |
| Authorized Signatory Company: | | | | | | | |
| T and Z Investments I LLC | | | | | | | |
| i and z investments i llo | | | | | | | |

Attachment to Proof of Claim

Debtors: IEH Auto Parts Holding LLC, et al.

| Debtor | Case No. |
|--------------------|----------|
| IEH Auto Parts LLC | 23-90057 |

T&Z Investments I LLC ("T&Z") hereby submits this Proof of Claim in the above-captioned case. T&Z's claim against Debtors is as follows and is based upon the following facts:

Basis for and Amount of Claim:

- 1. On January 31, 2023 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the "Bankruptcy Court").
- 2. T&Z is the landlord under a lease originally dated December 1, 2004 (with amendments and modifications, the "Lease") for property located at 3425 Old Bethlehem Pike, Souderton, PA 18964 (the "Premises") where IEH Auto Parts LLC ("IEH") is the tenant.
- 3. IEH has occupied the Premises since the Petition Date. On August 10, 2023, the Court entered the Order Granting Debtors' Fourth Omnibus Motion for Entry of an Order (A) Authorizing and Approving (A) The Rejection of Certain Unexpired Leases of Non-Residential Real Property, (B) the Rejection of Certain Executory Contracts, and (C) Abandonment of Certain Personal Property, if any, Each Effective as of the Respective Effective Rejection Date, and (II) Granting Related Relief (Docket No. 851, the "Rejection Order"). The Rejection Order approved the rejection of the Lease effective as of July 31, 2023.
- 4. As set forth more fully in <u>Exhibit 1</u> hereto, IEH is indebted to T&Z in the amount of \$130,522.66 for the period from the Petition Date through the rejection of the Lease, which is entitled to administrative priority.
- 5. T&Z asserts a claim against IEH for damages relating to the rejection of the Lease. The Third Amendment to the Lease extends the term of the Lease through and including February 29, 2024. The term remaining on the Lease is less than one year and thus is not limited by Bankruptcy Code section 502(b)(6). The post rejection charges equal \$53,177,81. As more fully set forth in Exhibit 1 hereto, the total amount of damages is equal to \$183,700.47, inclusive of the administrative portion indicated in the preceding paragraph. The amount that T&Z may recover for reletting the premises is not yet determined.
- 6. The documents supporting this claim include, among other things, the Lease, invoices, other billings and correspondence between the Debtors and T&Z. These documents are voluminous and contain proprietary and confidential information and will be provided upon written request after appropriate confidentiality measures are implemented. Furthermore, T&Z believes that the Debtors have possession of these documents either in original or copy form.

Distributions:

7. Any distributions on account of this Proof of Claim should be directed as follows:

Legal Department Velocity Venture Partners LLC One Belmont Ave., Suite 520 Bala Cynwyd, PA 19004

Reservation of Rights:

8. In executing and filing this Proof of Claim, T&Z is not waiving in any manner or under any circumstances any security interest it now has or may be determined to have at any time, nor is it waiving any claim, action, or cause of action it may have against the Debtors or any other entity or person, including the right to assert amounts in amounts different from the amounts set forth herein, nor is it waiving any defense, offset, recoupment, counterclaim or similar right or remedy it may now have or at any time has against the Debtors or any other entity or person or with respect to any legal or equitable proceeding now existing or hereafter commenced. T&Z reserves the right to amend or supplement this Proof of Claim in any respect including, but not limited to, the assertion, by proof of claim or other application to this Bankruptcy Court, for any amount that becomes due under any of the various agreements, pursuant to court order or otherwise, and continuing costs, fees and expenses (including legal fees and disbursements) arising in relation to the claims asserted herein or any of the agreements and the assertion of an administrative expense priority and adequate protection for any such claim or claims.

Exhibit 1

Aging Detail

| DB Caption: live 02/26/2021 | T+- +00000F4 | A A - Of 00/21/2022 | D+ T 00/2022 |
|-------------------------------|-----------------------|-----------------------|------------------|
| DR (antion, live (17/76/707) | Lenanti fullililili54 | Age As Ot: 08/31/2023 | POST 10: U8/2U23 |

| Property | Customer | Lease | | Tran# | Charge | | Month | Current | 0-30 | 31-60 | 61-90 | Over | Pre- | Total |
|------------------------------|-------------|--------------------|------|---------|--------|-----------|---------|----------------------|----------|-------|-------|------------|----------|------------|
| Порелеу | | | | | Code | | | Owed | Owed | Owed | Owed | 90 Owed | payments | Owed |
| 3425 Bethlehe | m Pike (34 | 25beth) | | | | | | | | | | | | |
| IEH Auto Parts | s LLC (t000 | 0054) | | | | | | | | | | | | |
| 3425beth | | IEH Auto Parts LLC | Past | C-37464 | estcam | 2/8/2023 | 02/2023 | 4,002.92 | 0.00 | 0.00 | 0.00 | 4,002.92 | 0.00 | 4,002.92 |
| 3425beth | | IEH Auto Parts LLC | Past | C-37465 | estcam | 2/8/2023 | 02/2023 | 4,002.92 | 0.00 | 0.00 | 0.00 | 4,002.92 | 0.00 | 4,002.92 |
| 3425beth | | IEH Auto Parts LLC | Past | C-37466 | estcam | 2/8/2023 | 02/2023 | -1,372.09 | 0.00 | 0.00 | 0.00 | -1,372.09 | 0.00 | -1,372.09 |
| 3425beth | | IEH Auto Parts LLC | Past | C-37467 | estcam | 2/8/2023 | 02/2023 | -1,372.09 | 0.00 | 0.00 | 0.00 | -1,372.09 | 0.00 | -1,372.09 |
| 3425beth | | IEH Auto Parts LLC | Past | C-37479 | camrec | 2/10/2023 | 02/2023 | 35,931.13 | 0.00 | 0.00 | 0.00 | 35,931.13 | 0.00 | 35,931.13 |
| 3425beth | | IEH Auto Parts LLC | Past | C-37480 | camrec | 2/10/2023 | 02/2023 | 70,321.95 | 0.00 | 0.00 | 0.00 | 70,321.95 | 0.00 | 70,321.95 |
| 3425beth | | IEH Auto Parts LLC | Past | C-38398 | estcam | 3/1/2023 | 03/2023 | 2,630.83 | 0.00 | 0.00 | 0.00 | 2,630.83 | 0.00 | 2,630.83 |
| 3425beth | | IEH Auto Parts LLC | Past | C-40136 | estcam | 4/1/2023 | 04/2023 | 2,630.83 | 0.00 | 0.00 | 0.00 | 2,630.83 | 0.00 | 2,630.83 |
| 3425beth | | IEH Auto Parts LLC | Past | C-42450 | estcam | 5/1/2023 | 05/2023 | 2,630.83 | 0.00 | 0.00 | 0.00 | 2,630.83 | 0.00 | 2,630.83 |
| 3425beth | | IEH Auto Parts LLC | Past | C-44502 | estcam | 6/1/2023 | 06/2023 | 2,630.83 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2,630.83 |
| 3425beth | | IEH Auto Parts LLC | Past | C-47176 | estcam | 7/1/2023 | 07/2023 | 2,630.83 | 2,630.83 | 0.00 | 0.00 | 0.00 | 0.00 | 2,630.83 |
| 3425beth | | IEH Auto Parts LLC | Past | C-50593 | late | 7/31/2023 | 07/2023 | 5,853.77 | 5,853.77 | 0.00 | 0.00 | 0.00 | 0.00 | 5,853.77 |
| | | IEH Auto Parts LLC | | | | | | 130,522.66 | 8,484.60 | 0.00 | 0.00 | 119,407.23 | 0.00 | 130,522.66 |
| 3425beth | | | | | | | | 130,522.66 | 8,484.60 | 0.00 | 0.00 | 119,407.23 | 0.00 | 130,522.66 |
| Post Rejection | on | | | | | | | | | | | | | |
| Charge | | | | | | | | | | | | | | |
| August 2023 | | | | | | | | 4,962.75 | | | | | | |
| August 2023 | | | | | | | | 2,634.08 | | | | | | |
| September 2 | | | | | | | | 4,962.75 | | | | | | |
| September 2 | | | | | | | | 2,634.08 | | | | | | |
| October 2023 October 2023 | | | | | | | | 4,962.75 2,634.08 | | | | | | |
| November 20 | | | | | | | | 4,962.75 | | | | | | |
| November 20 | | | | | | | | 2,634.08 | | | | | | |
| December 20 | | | | | | | | 4,962.75 | | | | | | |
| December 20 | | | | | | | | 2,634.08 | | | | | | |
| January 2024 | | | | | | | | 4,962.75 | | | | | | |
| January 2023 | | | | | | | | 2,634.08 | | | | | | |
| February 202 | | | | | | | | 4,962.75 | | | | | | |
| February 202 | | | | | | | | 2,634.08 | | | | | | |
| Post Rejection | | | | | | | | 53,177.81 | | | | | | |

183,700.47

Grand Total

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. ¹ |) (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 May 15, 2025, employees of Verita caused the following document to be served via Electronic Mail upon the service lists attached hereto as **Exhibit A** and **Exhibit B**; and via First Class Mail upon the service lists attached hereto as **Exhibit C** and **Exhibit D**:

• Wind-Down Debtor's Amended Objection to Proof of Claim No. 716 Filed by T and Z Investments I LLC [Docket No. 346]

Dated: May 20, 2025

/s/ Rossmery Martinez

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

¹ 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.

Exhibit A

$\textbf{Caase223990055} \ \ \, \textbf{DDocumeent375} 13 \ \ \, \textbf{Fillied in TXSSB} born056202225 \ \ \, \textbf{Flagge} e33061133$ Exhibit A

Master Service List Served via Electronic Mail

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Master Service List Served via Electronic Mail

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$\textbf{Caase223990055} \ \ \, \textbf{DDocumeent375} 13 \ \ \, \textbf{Fillied in TXSSB} born \textbf{056202225} \ \ \, \textbf{Flagge} \textbf{e} \textbf{6600 fl.133} \\ \textbf{exhibit A}$

Master Service List Served via Electronic Mail

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Exhibit B

Casse223990055 Direcumeent 137513 Filided in TIXSBB on 1056210225 Pragee88 of 1183 Exhibit B

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Exhibit C

Case223990555 Dixocumeent137513 FiliedininTXXSB0on056202225 Filage100061133

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| | US Environmental Protection | | | | | | | |
| Environmental Protection Agency (US) | 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 |
| | | | State Capitol Bldg 1 Rm E- | 1900 Kanawha Blvd., | | | | |
| West Virginia Attorney General | West Virginia Attorney General | Attn Bankruptcy Department | 26 | East | | Charleston | WV | 25305 |
| | | | | 114 East, State | PO Box | | | |
| Wisconsin Attorney General | Wisconsin Attorney General | Attn Bankruptcy Department | Wisconsin Dept. of Justice | Capitol | 7857 | Madison | WI | 53707-7857 |

Exhibit D

Case 223990555 Document 37513 Filideld nnTX\$Boon 056203225 Filiage 1.83 of 1.83 Exhibit D

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

| CreditorName | CreditorNoticeName | Address1 | Address2 | City | State | Zip |
|----------------------------|-----------------------------------|------------------|---------------------------|-------------|-------|-------|
| T and Z Investments, I LLC | c/o Velocity Venture Partners LLC | Legal Department | One Belmont Ave Suite 520 | Bala Cynwyd | PA | 19004 |