

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

<hr style="border: 0.5px solid black;"/> <p>In re:</p> <p>AUTO PLUS AUTO SALES LLC,¹</p> <p style="text-align: center;">Wind-Down Debtor.</p> <hr style="border: 0.5px solid black;"/>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 23-90055 (CML)</p> <p>(Formerly Jointly Administered under Lead Case IEH Auto Parts Holding LLC, Case No. 23-90054)</p> <p>Re: Docket Nos. 309, 346</p>
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**CERTIFICATE OF COUNSEL REGARDING
THE WIND-DOWN DEBTOR’S AMENDED OBJECTION TO
PROOF OF CLAIM NO. 716 FILED BY T AND Z INVESTMENTS I LLC**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned wind down debtor (the “Wind-Down Debtor”) certifies as follows:

1. On March 14, 2025, the Wind-Down Debtor filed the *Wind-Down Debtor’s Objection to Proof of Claim No. 716 Filed by T and Z Investments I LLC* [Docket No. 309] (the “Original Objection”).

2. The deadline for parties to file objections or responses to the Original Objection was April 14, 2025 (the “Original Response Deadline”).

3. On March 31, 2025, Michael D. Warner, solely in his capacity as trustee (the “GUC Trustee”), filed the *GUC Trustee’s Response and Reservation of Rights to Wind-Down Debtor’s Objections to Non-GUC Claims* [Docket No. 323] (the “GUC Trustee Response”). No other

¹ 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>.



responses were filed on the docket, and counsel to the Wind-Down Debtor did not receive any informal responses on or before the Original Response Deadline.

4. On May 15, 2025, the Wind-Down Debtor filed the *Wind-Down Debtor's Amended Objection to Proof of Claim No. 716 Filed by T and Z Investments I LLC* [Docket No. 346] (the "Amended Objection"), in part to resolve the GUC Trustee Response.

5. The deadline for parties to file objections or responses to the Amended Objection was June 16, 2025 (the "Amended Response Deadline"). No responses were filed on the docket on or before the Amended Response Deadline, and counsel to the Wind-Down Debtor did not receive any informal responses.

6. Counsel to the GUC Trustee has confirmed the Amended Objection resolves the GUC Trustee Response. As such, undersigned counsel certifies that the attached proposed order resolves all known objections and responses received.

7. The Wind-Down Debtor requests that the Court enter the attached proposed order at its earliest convenience.

Houston, Texas
Dated: June 17, 2025

/s/ Emily Meraia

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Certificate of Service

I certify that on June 17, 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

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
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<hr style="border: 0.5px solid black;"/> <div style="display: flex; justify-content: space-between;"><div style="width: 80%;"><p>In re:</p><p>AUTO PLUS AUTO SALES LLC,¹</p><p style="text-align: center;">Wind-Down Debtors.</p></div><div style="width: 15%; text-align: center;"><p>)</p><p>)</p><p>)</p><p>)</p><p>)</p><p>)</p><p>)</p><p>)</p></div></div>	<p>Chapter 11</p> <p>Case No. 23-90054 (CML)</p> <p>(Formerly Jointly Administered under</p> <p>Lead Case IEH Auto Parts Holding</p> <p>LLC, Case No. 23-90054)</p> <p>Re: Docket Nos. 309, 346</p>
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**ORDER SUSTAINING WIND-DOWN DEBTOR'S AMENDED OBJECTION
TO PROOF OF CLAIM NO. 716 FILED BY T AND Z INVESTMENTS I LLC**

Upon the objection (the “Objection”)² of the above-captioned Reorganized Debtor for entry of an order (this “Order”) sustaining the Objection and disallowing in part and reclassifying in part the Priority Claim portion of the Claim, all as more fully set forth in the Objection; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of Debtor, its creditors, and other parties in interest; and this Court having found that Debtor’s notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Objection and having heard the statements in support of the relief requested therein; and this Court having determined that the legal and factual bases

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

set forth in the Objection establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Claim is disallowed in part and reclassified in part as follows (the “Modified Claim”):

Claim Classification	Filed Amount	Modified Amount
Secured Claim	\$14,043.74	\$14,043.74
GUC Claim (Nonpriority)	\$53,177.81	\$91,739.77
Priority Claim	\$130,522.66	\$21,638.75
Total	\$183,700.47³	\$113,378.52⁴

2. Nothing in this Order allows the Modified Claim. The Wind-Down Debtor and GUC Trustee may object to the Modified Claim on any grounds whatsoever.

3. Veritas Global, LLC (f/k/a Kurtzman Carson Consultants, LLC), as claims, noticing and solicitation agent, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any claim against a Debtor entity; (b) a waiver of the Wind-Down Debtor’s right to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any agreement, contract, or

³ The Secured Claim amount is not included in the total amount of the Claim because it is a right to setoff rather than an additional amount owed.

⁴ The Secured Claim amount is not included in the total of the Modified Claim because it is a right to setoff rather than an additional amount owed.

lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Wind-Down Debtor's rights under the Bankruptcy Code or any other applicable law.

5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall prejudice to the rights of the Wind-Down Debtor or the GUC Trustee, as defined in the Plan, to object to any claim, including the Claim, on any grounds whatsoever. The Wind-Down Debtor specifically and expressly reserves for all purposes the GUC Trustee's right and ability to object to any and all general unsecured claims notwithstanding the relief granted in this Order, whether such claims are reclassified or otherwise modified under this Order, and this Order does not in any manner whatsoever inhibit, modify or otherwise limit the GUC Trustee's right to object to any general unsecured claim for any reason whatsoever, including without limitation to hereafter object to a general unsecured claim to the extent (i) such claim should properly be classified as an administrative claim pursuant to Section 503(b)(9) or otherwise and (ii) such claim is reclassified from a Section 503(b)(9) claim to a general unsecured claim pursuant to this Order. The Wind-Down Debtor's and/or Plan Agent's beliefs and allegations with respect to any claims affected by the Objection or this Order, whether general unsecured claims or otherwise, shall not be binding on or otherwise prejudice the Plan Agent in any respect, irrespective of whether the GUC Trustee challenged those beliefs or allegations as set forth in the Objection.

6. The Wind-Down Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

7. This Order is immediately effective and enforceable upon its entry.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE