

Nathan Ochsner, Clerk

In re:	) Chapter 11
	)
AUTO PLUS AUTO SALES LLC, <sup>1</sup>	) Case No. 23-90054 (CML)
	)
Wind-Down Debtors.	) (Formerly Jointly Administered under
	) Lead Case IEH Auto Parts Holding
	) LLC, Case No. 23-90054)
	) <b>Re: Docket Nos. 309, 346</b>

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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”):

<b>Claim Classification</b>	<b>Filed Amount</b>	<b>Modified Amount</b>
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
<b>Total</b>	<b>\$183,700.47<sup>3</sup></b>	<b>\$113,378.52<sup>4</sup></b>

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

<sup>3</sup> 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.

<sup>4</sup> 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

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CHRISTOPHER M. LOPEZ  
UNITED STATES BANKRUPTCY JUDGE