

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

In re:

AUTO PLUS AUTO SALES LLC,¹

Wind-Down Debtor.

)
) Chapter 11
)
) Case No. 23-90055 (CML)
) (Formerly Jointly Administered under
) Lead Case IEH Auto Parts Holding LLC,
) Case No. 23-90054)
)

STIPULATION AND AGREED ORDER REGARDING MEDIATION

The above captioned wind-down debtor (the “Wind-Down Debtor”) and MANN + HUMMEL Filtration Technologies US LLC (“M+H”) (together with the Wind Down Debtor, the “Parties”) have agreed to mediation with respect to M+H’s *Motion for Allowance and Payment of Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code* [Case No. 23-90054, Docket No. 966] (the “Admin Claim Motion”), the Wind-Down Debtors’ objection to the Admin Claim Motion [Docket No. 272] (the “Objection”), and M+H’s response to the Objection [Docket No. 392].

Upon the request and agreement of the Parties, it is therefore ORDERED THAT:

1. Bankruptcy Judge Marvin Isgur (the “Mediator”) is appointed as a mediator in this case. The Mediator is empowered to require individuals with the authority to bind each Party to attend any and all mediation sessions.
2. At least one representative with full settlement authority for each of the Parties shall attend the mediation, either in person or virtually, to occur with the Mediator on October 8, 2025,

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.kcellc.net/autoplus>.



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or another date upon which the Parties and the Mediator agree, and continuing on such other dates as the Parties and the Mediator may agree.

3. Mediation will be governed by Paragraph S of the *Procedures for Complex Cases in the Southern District of Texas (Effective September 18, 2024)*.

4. The scope, location, time, and procedures for the mediation will be determined by the Mediator, following such consultation with the Parties as he deems appropriate.

5. The Parties are authorized and empowered to take all actions necessary to effectuate the relief granted in this Stipulation and Agreed Order.

6. Each of the Parties represents and warrants that it is duly authorized to enter into and be bound by this Stipulation and Agreed Order.

7. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation of this Stipulation and Agreed Order.

Houston, Texas

Dated: _____, 2025

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

AGREED:

Houston, Texas
Dated: September 5, 2025

/s/ Zachary McKay

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