

ENTERED

September 08, 2025

Nathan Ochsner, Clerk

**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) |
| |) | (Formerly Jointly Administered under |
| Wind-Down Debtor. |) | 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.kccllc.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)*.

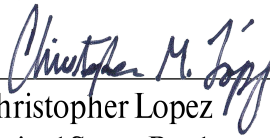
4. The scope, location, time, and procedures for the mediation will be determined by the Mediator, following such consultation with the Parties as he deems appropriate.

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.

Signed: September 08, 2025



Christopher Lopez
United States Bankruptcy Judge

AGREED:

Houston, Texas
Dated: September 5, 2025

/s/ Zachary McKay

JACKSON WALKER LLP

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: zmkay@jw.com
emeraia@jw.com

Counsel to the Wind-Down Debtor

and

/s/ Kristian W. Gluck (w/permission)

NORTON ROSE FULBRIGHT US LLP

Kristian W. Gluck (SBT 24038921)
Jason I. Blanchard (SBT 24130197)
Michael C. Berthiaume (SBT 24129008)
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201-7932
Telephone: (214) 855-8000
Facsimile: (214) 855-8200
kristian.gluck@nortonrosefulbright.com
jason.blanchard@nortonrosefulbright.com
michael.berthiaume@nortonrosefulbright.com

*Counsel to MANN + HUMMEL Filtration Technologies
US LLC*

United States Bankruptcy Court
Southern District of Texas

In re:
Auto Plus Auto Sales LLC
IEH Auto Parts Holding LLC
Debtors

Case No. 23-90055-cml
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Sep 08, 2025

User: ADIuser
Form ID: pdf002

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Total Noticed: 24

The following symbols are used throughout this certificate:

| Symbol | Definition |
|--------|--|
| + | Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP. |

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 10, 2025:

| Recip ID | Recipient Name and Address |
|----------|--|
| db | + AP Acquisition Company New York LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + AP Acquisition Company North Carolina LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + AP Acquisition Company Washington LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + Auto Plus Auto Sales LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + IEH AIM LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + IEH Auto Parts Holding LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + IEH Auto Parts Puerto Rico, Inc., 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| db | + IEH BA LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754 |
| cr | Cars Training Network Inc., c/o Kevin Bell, 350 Marwood Dri, Oshawa, Ontario, Canada, L1H8B4 |
| cr | + City of Mesquite, Grimes & Linebarger, LLP, c/o John K. Turner, 120 W Main Suite 201, Mesquite, TX 75149-4224 |
| cr | Continental Battery Company, c/o Clark Hill PLC, Attn: Audrey L. Hornisher, 900 Main Street, Suite 6000, Dallas, TX 75202 |
| cr | + Fidelity and Deposit Company of Maryland, c/o Clark Hill PLC, Duane J. Brescia, 3711 South Mopac Expressway, Building One, Suite 500 Austin, TX 78746-8041 |
| cr | + Integrated Handling Inc, 13325 Enterprise Ave, Cleveland, OH 44135-5105 |
| cr | + MANN + HUMMEL Filtration Technologies US LLC, Attn: Len Rowe and Matt Cloninger, 1 Wix Way, Gastonia, NC 28054-6142 |
| cr | + Nyler Shields, c/o Peter B. Geen, Jr., 80 Monroe Ave, Ste900, Memphis, TN 38103-2481 |

TOTAL: 15

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

| Recip ID | Notice Type: Email Address | Date/Time | Recipient Name and Address |
|----------|--|----------------------|--|
| cr | + Email/Text: julie.parsons@mvalaw.com | Sep 08 2025 20:06:00 | Dallam County Appraisal District, McCreary, Veselka, Bragg & Allen, P.C., P.O. Box 1269, Round Rock, TX 78680-1269 |
| cr | + Email/Text: dallas.bankruptcy@LGBS.com | Sep 08 2025 20:07:00 | Dallas County, Linebarger Goggan Blair & Sampson, LLP, c/o John K Turner, 2777 N. Stemmons Frwy Ste 1000, Dallas, TX 75207-2328 |
| cr | + Email/Text: collections@eucmail.com | Sep 08 2025 20:07:00 | Easton Utilities, POB 1189, 219 N Washington St, Easton, MD 21601-3150 |
| cr | + Email/Text: msprouse@sprousepllc.com | Sep 08 2025 20:07:00 | FRAM Group Operations LLC, c/o Sprouse Law Firm, 901 Mopac Expwy South, Bldg 1, Ste 300, Austin, TX 78746-5883 |
| cr | + Email/Text: dallas.bankruptcy@LGBS.com | Sep 08 2025 20:07:00 | Irving ISD, Linebarger Goggan Blair & Samspon, LLP, c/o John K. Turner, 2777 N. Stemmons Frwy Ste 1000, Dallas, TX 75207-2328 |
| op | + Email/Text: kccnoticing@kccllc.com | Sep 08 2025 20:07:00 | Kurtzman Carson Consultants, LLC dba Verita Global, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245-5614 |
| cr | + Email/Text: dallas.bankruptcy@LGBS.com | Sep 08 2025 20:07:00 | Tarrant County, Linebarger Goggan Blair & Sampson, LLP, c/o John K. Turner, 2777 N Stemmons Frwy Ste 1000, Dallas, TX 75207-2328 |
| cr | + Email/Text: julie.parsons@mvalaw.com | Sep 08 2025 20:06:00 | The County of Dallam, Texas, McCreary, Veselka, Bragg & Allen, P.C., P.O. Box 1269, Round Rock, |

District/off: 0541-4
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TX 78680-1269

cr + Email/Text: julie.parsons@mvbalaw.com

Sep 08 2025 20:06:00

The County of Stephens, Texas, c/o McCreary,
Veselka, Bragg & Allen, P.O. Box 1269, Round
Rock, TX 78680-1269

TOTAL: 9

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

| Recip ID | Bypass Reason | Name and Address |
|----------|---------------|--|
| tr | | Michael D Warner |
| cr | | BLUESCAPE ALTERA FMC, LLC |
| cr | | Clarit Realty, Ltd. |
| cr | | Disney Road Associates, LLC |
| intp | | Edwin McCrary |
| cr | | General Motors LLC |
| intp | | Jackson Walker LLP |
| op | | Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, 3rd Floor, El Segundo |
| cr | | RPT Hialeah I, LLC |
| cr | | UNITED STATES OF AMERICA |

TOTAL: 10 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 10, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 8, 2025 at the address(es) listed below:

| Name | Email Address |
|-------------------------|---|
| Alicia Lenae Barcomb | on behalf of U.S. Trustee US Trustee alicia.barcomb@usdoj.gov |
| Audrey Lorene Hornisher | on behalf of Creditor Continental Battery Company audrey.hornisher@clarkhillstrasburger.com mina.alvarez@clarkhillstrasburger.com |
| Christina E. Cullom | on behalf of Creditor UNITED STATES OF AMERICA christina.cullom@usdoj.gov Caseview.ecf@usdoj.gov;USATXS.Bankruptcy-ECF@usdoj.gov;nicole.robbs@usdoj.gov;raymond.babauta@usdoj.gov;rhoma.romero@usdoj.gov |
| Christopher R. Bankler | on behalf of Plaintiff IEH Auto Parts Holding LLC cbankler@jw.com kgradney@jw.com |
| Duane J Brescia | on behalf of Creditor Fidelity and Deposit Company of Maryland dbrescia@clarkhill.com kwebster@clarkhill.com,efarrar@clarkhill.com |
| Edward L Ripley | on behalf of Defendant Elliot Auto Supply Co. Inc. eripley@andrewsmyers.com, sray@andrewsmyers.com |

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| Edward Todd Sable | on behalf of Creditor General Motors LLC tsable@honigman.com |
| Emily Meraia | on behalf of Debtor IEH BA LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com |
| Emily Meraia | on behalf of Debtor IEH AIM LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com |
| Emily Meraia | on behalf of Debtor IEH Auto Parts Holding LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com |
| Emily Meraia | on behalf of Debtor IEH Auto Parts Puerto Rico Inc. emeraia@jw.com, kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com |
| Emily Meraia | on behalf of Debtor Auto Plus Auto Sales LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com |
| Evan Gershbein | on behalf of Other Prof. Kurtzman Carson Consultants LLC ECFpleadings@kccllc.com ECFpleadings@kccllc.com |
| Evan Gershbein | on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com |
| JaKayla DaBera | on behalf of Trustee Michael D Warner jdabera@krcl.com jdabera@ecf.courtdrive.com;ecf@krcl.com |
| Jason Lee Boland | on behalf of Interested Party Jackson Walker LLP jason.boland@nortonrosefulbright.com |
| Jayson B. Ruff | on behalf of U.S. Trustee US Trustee jayson.b.ruff@usdoj.gov |
| Jennifer A Gehrt | on behalf of Creditor RPT Hialeah I LLC jgehart@bglaw.net |
| Jim D. Aycock | on behalf of Defendant Elliot Auto Supply Co. Inc. jaycock@andrewsmyers.com, plee@andrewsmyers.com |
| John Kendrick Turner | on behalf of Creditor Dallas County john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com |
| John Kendrick Turner | on behalf of Creditor City of Mesquite john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com |
| John Kendrick Turner | on behalf of Creditor Tarrant County john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com |
| John Kendrick Turner | on behalf of Creditor Irving ISD john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com |
| Julie Anne Parsons | on behalf of Creditor The County of Stephens Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com |
| Julie Anne Parsons | on behalf of Creditor Dallam County Appraisal District jparsons@mvbalaw.com vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com |
| Julie Anne Parsons | on behalf of Creditor The County of Dallam Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com |
| Kim Ellen Lewinski | on behalf of Interested Party Edwin McCrary klewinski@dykema.com mdurrschmidt@dykema.com;scallier@dykema.com |
| Kyle Woodard | on behalf of Trustee Michael D Warner kwoodard@krcl.com kwoodard@ecf.courtdrive.com;ecf@krcl.com;srhea@krcl.com |
| Lawrence A. Lichtman | on behalf of Creditor General Motors LLC llichtman@honigman.com jwright-smoot@honigman.com |
| Lisa Ann Powell | on behalf of Creditor Disney Road Associates LLC Lisa.Powell@fisherbroyles.com |
| Lisa Luz Parker | on behalf of Creditor UNITED STATES OF AMERICA lisa.luz.parker@usdoj.gov nicole.robbs@usdoj.gov;isabell.hinojosa@usdoj.gov;USATXS.Bankruptcy-ECF@usdoj.gov;caseview.ecf@usdoj.gov |

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|----------------------------|--|
| Maha Ghyas | on behalf of Debtor Auto Plus Auto Sales LLC mghyas@jw.com |
| Marvin E Sprouse, III | on behalf of Creditor FRAM Group Operations LLC msprouse@sprousepllc.com sprouselawfirm@gmail.com |
| Michael Berthiaume | on behalf of Creditor MANN + HUMMEL Filtration Technologies US LLC michael.berthiaume@nortonrosefulbright.com |
| Michelle E Shriro | on behalf of Creditor Clarit Realty Ltd. mshriro@singerlevick.com, scotton@singerlevick.com;tguillory@singerlevick.com |
| Millie Aponte Sall | on behalf of U.S. Trustee US Trustee millie.sall@usdoj.gov |
| Susan Tran Adams | on behalf of Debtor IEH Auto Parts Holding LLC stran@ts-llp.com corraltransinghllp@jubileebk.net |
| Susan Tran Adams | on behalf of Debtor Auto Plus Auto Sales LLC stran@ts-llp.com corraltransinghllp@jubileebk.net |
| US Trustee | USTPRegion07.HU.ECF@USDOJ.GOV |
| Veronica Ann Polnick | on behalf of Debtor Auto Plus Auto Sales LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor IEH Auto Parts Puerto Rico Inc. vpolnick@nvfirm.com, kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor IEH BA LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor AP Acquisition Company Washington LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor AP Acquisition Company North Carolina LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor IEH Auto Parts Holding LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor IEH AIM LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick | on behalf of Debtor AP Acquisition Company New York LLC vpolnick@nvfirm.com kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Vianey Garza | on behalf of U.S. Trustee US Trustee vianey.garza@usdoj.gov |
| Victoria Nicole Argeroplos | on behalf of Debtor Auto Plus Auto Sales LLC vargeroplos@jw.com msalinas@jw.com;kgradney@jw.com;jpupo@jw.com;dtrevino@jw.com |
| Zachary S McKay | on behalf of Debtor IEH Auto Parts Holding LLC zmckay@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com |
| Zachary S McKay | on behalf of Debtor Auto Plus Auto Sales LLC zmckay@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com |

TOTAL: 51