

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

MARELLI AUTOMOTIVE LIGHTING USA  
LLC *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11034 (CTG)

(Jointly Administered)

Hearing Date: January 7, 2026, at 11:30 a.m. (ET)

Obj. Deadline: December 31, 2025, at 4:00 p.m. (ET)

Re: Docket No. 1434

**PW FUND B, LP'S LIMITED OBJECTION  
AND RESERVATION OF RIGHTS TO NOTICE OF CURE COSTS  
AND POTENTIAL ASSUMPTION AND ASSIGNMENT OF EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES IN CONNECTION WITH SALE**

PW Fund B, LP ("PWF"), by and through undersigned counsel, hereby files this limited objection and reservation of rights (this "Limited Objection") to the *Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Certain Unexpired Leases, (II) Authorizing the Assumption Notice Related Thereto, and (III) Granting Related Relief, filed on December 23, 2023, at Docket No. 1434* (the "Cure Notice")<sup>2</sup>. In support of this Limited Objection, PWF respectfully represents as follows:

**RELEVANT BACKGROUND**

1. On June 11, 2025 (the "Petition Date"), the above-captioned debtors and debtors-in-possession (the "Debtors") filed voluntary petitions for relief commencing their chapter 11

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://www.veritaglobal.net/Marelli>. The location of Marelli Automotive Lighting USA LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 26555 Northwestern Highway, Southfield, Michigan 48033.

<sup>2</sup> Capitalized terms used but not otherwise defined in this Objection shall have the meanings ascribed to them in the Assumption Motion.



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cases (the “Chapter 11 Cases”) under title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”).

2. On October 6, 2025, the Bankruptcy Court entered its *Order (I) Extending the Time Within Which the Debtors Must Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief* [Docket No. 1054] (the “Extension Order”). The Extension Order extended the date by which the Debtors must assume their unexpired, nonresidential real property leases to avoid automatic rejection under Section 365(d)(4) of the Bankruptcy Code to January 7, 2026.

3. PWF is the landlord for the premises located at 12112-12124 Rojas Drive, Suite 200 and 900, El Paso, Texas, USA, 79936 (the “Premises”) pursuant to a Standard Industrial/Commercial Multi-Tenant Lease Net (the “Lease”) between Landlord and Marelli Automotive Lighting USA LLC, a Delaware limited Liability Company (the “Lessee” or “Debtor”).

#### **LIMITED OBJECTION & RESERVATION OF RIGHTS**

4. PWF does not object to the lease assumption of the Lease but does object to the Cure Amount with respect to its lease identified on the Cure Notice at Exhibit A, No. 139 (the “Cure Amount”). Debtors proposed cure amount is \$0.00. According to PWF records, the cure amount of the Lease as of January 1, 2026, is \$257,599.09. This amount is comprised, as follows:

<b>Pre-petition Rents (June 2025)</b>	<b>\$132,633.01</b>
Post-petition Rents (January 2026 Base Rent)	\$110,430.38
Post-petition Rents (January 2026 CAM Est)	\$29,047.42
Less Post-petition credit	(\$14,510.82)

TOTAL DUE AS OF 1/1/2026

\$257,599.99

5. PWF further reserves any and all rights to supplement or amend this Limited Objection for any reason, including, without limitation, for purposes of adding any additional amounts that may come due prior to the date of assumption of the Lease, and for purposes of asserting any and all amounts due under the Lease.

6. PWF further reserves the right to present evidence supporting this Limited Objection, and to be heard at any hearing with respect to this Limited Objection.

7. This Limited Objection is not intended to be, nor should it be construed as, a waiver by PWF of any of their rights under the lease, the Bankruptcy Code, or applicable law.

**CONCLUSION**

WHEREFORE, PWF respectfully requests that this Court enter an order consistent with the foregoing Limited Objection, and such other and further relief as the Court deems just and proper under the circumstances.

January 2, 2026  
Wilmington, Delaware

Respectfully submitted,

**FAEGRE DRINKER BIDDLE & REATH LLP**

/s/ Brett D. Fallon

Brett D. Fallon (No. 2480)  
222 Delaware Avenue, Suite 1410  
Wilmington, DE 19801  
Telephone: 302-467-4200  
Fax: 302-467-4201  
brett.fallon@faegredrinker.com

Counsel for *PW Fund B, LP*

**CERTIFICATE OF SERVICE**

I, Brett D. Fallon, hereby certify that on January 2, 2026, I caused a copy of the foregoing *PW Fund B, LP's Limited Objection and Reservation of Rights to Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale* to be served via first-class mail and email on the parties listed below.

**Via First-Class Mail and Email**

Marelli Automotive Lighting USA LLC Marisa Iasenza 26555 Northwestern Highway Southfield, MI 48033 marisa.iasenza@marelli.com	Kirkland & Ellis LLP Spencer A. Winters 333 W. Wolf Point Plaza Chicago, IL 60654 spencer.winters@kirkland.com
Kirkland & Ellis LLP Nicholas M. Adzima Evan Swager 601 Lexington Avenue New York, NY 10022 nicholas.adzima@kirkland.com evan.swager@kirkland.com	Pachulski Stang Ziehl & Jones LLP Laura Davis Jones Timothy P. Cairns Edward A. Corma 919 N. Market Street, 17 <sup>th</sup> Fl. PO Box 8705 Wilmington, DE 19899 ljones@pszjlaw.com tcairns@pszjlaw.com ecorma@pszjlaw.com
The Office of the United States Trustee for the District of Delaware Jane Leamy Timothy J. Fox, Jr. 844 King Street, Suite 2207 Lockbox 35 Wilmington, DE 19801 jane.m.leafy@usdoj.gov timothy.fox@usdoj.gov	Mayer Brown LLP Jason Elder 1221 Avenue of the Americas New York, NY 10020-1001 jason.elder@mayerbrown.com
Davis Polk & Wardwell LLP	Young Conaway Stargatt & Taylor, LLP

<p>Timothy Graulich  Richard J. Steinberg  450 Lexington Avenue  New York, NY 10017  timothy.graulich@davispolk.com  richard.seinberg@davispolk.com</p>	<p>Robert S. Brady  Andrew L. Magaziner  1000 N. King Street  Wilmington, DE 19801  rbrady@ycst.com  amagaziner@ycst.com</p>
<p>Akin Gump Strauss Hauer &amp; Feld LLP  Ira S. Dizengoff  Anna Kordas  One Bryant Park  New York, NY 10036  idizengoff@akingump.com  akordas@akingump.com</p>	<p>Akin Gump Strauss Hauer &amp; Feld LLP  Scott Alberino  Kate Doorley  Alexander F. Antypas  2001 K Street NW  Washington, DC 20006  salberino@akingump.com  kdoorley@akingump.com  aantypas@akingump.com</p>
<p>Cole Schotz P.C.  Justin R. Alberto  Stacy L. Newman  500 Delaware Avenue, Suite 600  Wilmington, DE 19801  jalberto@coleschotz.com  snewman@coleschotz.com</p>	<p>Paul, Weiss, Rifkind, Wharton &amp; Garrison LLP  Brian S. Hermann  Jacob Alderstein  1285 Avenue of the Americas  New York, NY 10019-6064  bhermann@paulweiss.com  jadlerstein@paulweiss.com</p>
<p>Paul Hastings LLP  Kristopher M. Hansen  Jonathan D. Canfield  Gabriel E. Sasson  Xue (Annie) Yu  200 Park Avenue  New York, NY 10166</p>	<p>Morris James LLP  Eric J. Monzo  Jason S. Levin  Siena B. Cerra  3205 Avenue North Blvd, Suite 100  Wilmington, DE 19801  emonzo@morrisjames.com</p>

krishansen@paulhastings.com joancanfield@paulhastings.com gabesasson@paulhastings.com xueyu@paulhastings.com	jlevin@morrisjames.com scerra@morrisjames.com
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Dated: January 2, 2026

/s/ Brett D. Fallon

Brett D. Fallon