IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: MARELLI AUTOMOTIVE LIGHTING USA LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 25-11034 (CTG) (Jointly Administered)
OPMOBILITY GESTION; OPMOBILITY SE; OPMOBILITY HOLDING USA, INC.; and OPMOBILITY LIGHTING HOLDING, Plaintiffs, v. STRATEGIC VALUE PARTNERS, LLC; MARELLI HOLDINGS CO., LTD.; MARELLI CORPORATION; MARELLI NORTH AMERICA, INC.; MARELLI HOLDING USA LLC; MARELLI TENNESSEE USA LLC; MARELLI AUTOMOTIVE LIGHTING USA LLC; and DOE DEFENDANTS 1-20, Defendants.	Adv. Pro. No. 26-50470 (CTG)

DEFENDANTS' (I) RESPONSE TO PLAINTIFFS' MOTION FOR ISSUANCE OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE, APPOINTMENT OF COMMISSIONER, AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION AND (II) CROSS-MOTION TO STAY PROCEEDINGS ON GROUNDS OF INTERNATIONAL COMITY

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed 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.

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Defendants Strategic Value Partners, LLC ("SVP"), Marelli Holdings Co., LTD., Marelli Corporation, Marelli North America, Inc., Marelli Holding USA LLC, Marelli Tennessee USA LLC, and Marelli Automotive Lighting USA LLC (collectively, "Marelli," and together with SVP, "Defendants"), hereby request that the Court enter the proposed Order in the form attached hereto (i) denying Plaintiffs' Motion for Issuance of Request for International Judicial Assistance, Appointment of Commissioner, and Direction of Submission of Hague Convention Application (the "Commissioner Motion") and (ii) granting Defendants' Cross-Motion to Stay Proceedings on Grounds of International Comity, the basis for which is set forth below. For the reasons described herein, the Commissioner Motion should be denied because this Adversary Proceeding should be stayed in its entirety and, if stayed, the Court does not need to address or grant what is otherwise an unnecessary motion in the Commissioner Motion.

CROSS-MOTION TO STAY

This Adversary Proceeding[2] is a forum shopping attempt to avoid a pending legal action in France (the "French Legal Proceeding") that involves the very same alleged non-competition obligations between Laurent Favre and OPmobility Gestion and OPmobility SE (collectively, "OPmobility") at issue here. This Adversary Proceeding is an attempted end run by OPmobility around the French Legal Proceeding, which involves the actual parties in privity on the Employment Agreement and seeks identical injunctive relief, and which is moving towards a potential dispositive ruling on September 22—while this case is only just beginning. Instead of waiting for a resolution in the French Legal Proceeding, OPmobility intends to seek the same injunctive relief in this Court. For this reason and the reasons discussed below, the Court should

[2] All capitalized terms not otherwise defined shall have the meaning ascribed to such terms below.

not permit OPmobility to pursue the same relief in two different courts and should stay this case in its entirety. Defendants respectfully request that the Court issue an order granting Defendants' Cross-Motion to Stay the entirety of this Adversary Proceeding in deference to the French Legal Proceeding.

Granting a stay of this Adversary Proceeding is appropriate on grounds of international comity because it involves the same subject matter and seeks the same injunctive relief as in the first-filed French Legal Proceeding: an order enjoining any employment of Mr. Favre by Marelli and/or SVP in contravention of the alleged obligations of his 2019 non-competition agreement with OPmobility. At its core, this Adversary Proceeding implicates a French employment contract, between French parties, interpretation of French law, and production of French documents and testimony from French witnesses—all of which are already at play in the French Legal Proceeding.

Moreover, the French Legal Proceeding is much further along than this Adversary Proceeding, including: (1) on April 13, 2026, Favre filed his complaint in the French Legal Proceeding; (2) on June 24, 2026, OPmobility filed its response to Favre's complaint, which included counterclaims seeking (i) to enjoin Mr. Favre from collaborating with Marelli or SVP or any employment of Mr. Favre by Marelli and/or SVP (*i.e.*, the same relief OPmobility would seek in this Court through a motion for preliminary injunction); and (ii) the production of all documents exchanged between Mr. Favre, Marelli, and SVP; and (3) on July 7, 2026, the court in the French Legal Proceeding held a hearing, and a potentially dispositive decision is expected to issue on September 22, 2026.

When considering a motion to stay proceedings on grounds of international comity, courts have considered a "litany of factors" including "the similarity of the issues, the order in which the actions were filed, the adequacy of the alternate forum, the potential prejudice to either party, the

convenience of the parties, the connection between the litigation and the United States, and the connection between the litigation and the foreign jurisdiction." *Christ v. Cormick*, 2007 WL 2022053, at *8 (D. Del. July 10, 2007) (citations omitted); *In re Nat'l Bank of Anguilla (Priv. Banking Tr.) Ltd.*, 580 B.R. 64, 98 (Bankr. S.D.N.Y. 2018) (stating same factors). Analysis of each of these factors, as well as the Court's interest in judicial economy and inherent authority to stay these proceedings, dictates that the Court enter an order staying all further action in this Adversary Proceeding in its entirety pending resolution of the French Legal Proceeding as a French court is the more appropriate forum to decide disputes regarding its own citizens, contracts, and law. Thus, the balance of factors that courts consider weigh in favor of deference to the French Legal Proceeding.

BACKGROUND

This Adversary Proceeding and the French Legal Proceeding both involve a non-competition clause contained in the employment agreement between Laurent Favre and OPmobility dated July 10, 2019 (the "Employment Agreement"). (Dkt. No. 2249 at ¶ 2).

Favre, a citizen of France, is the former Chief Executive Officer of OPmobility SE, a "French société en nom collectif (general partnership) with its principal place of business and registered office located at 19, Boulevard Jules Carteret, 69007 Lyon, France." (*Id.* at ¶¶ 2, 30). Pursuant to his employment with OPmobility, Favre entered into the Employment Agreement—written in French and governed by French law—that contained confidentiality and non-competition provisions. (Dkt. No. 2249 at ¶ 2).

Favre's employment with OPmobility ended on November 6, 2025. (Dkt. No. 2249 at ¶ 3). SVP subsequently approached OPmobility about the possibility of hiring Favre as CEO of Marelli. (*Id.* at ¶ 4). OPmobility objected to Favre's possible employment on the basis of the

Employment Agreement. (*Id.* at ¶ 5). OPmobility subsequently threatened legal action against Favre, Marelli, and SVP. In light of these threats, Favre filed his complaint against OPmobility SE and OPmobility Gestion in the French Legal Proceedings on April 13, 2026, seeking, among other things, an order finding that the non-competition provisions of the employment agreement were inapplicable and/or unenforceable as to Marelli. On June 24, 2026, OPmobility filed a response in the French Legal Proceeding and asserted counterclaims. Among other things, OPmobility seeks an order (i) enjoining the employment of Favre by Marelli or SVP or any collaboration between Favre and Marelli and/or SVP; (ii) the production of all documents exchanged between Favre, Marelli, and SVP; and (iii) damages for Favre's alleged breaches of the confidentiality provision in the Employment Agreement.

Two months after the initiation of the French Legal Proceedings, OPmobility filed the instant action (the "Adversary Proceeding") against SVP and Marelli, which are non-parties to the Employment Agreement at issue. Notwithstanding the fact that Favre is not a defendant in the Adversary Proceeding, OPmobility seeks identical injunctive relief as in the French Legal Proceedings: "preliminary and permanent relief enjoining the Defendants" from, among other things, "employing Mr. Favre in the same or similar position to his role at OPmobility, or from employing Mr. Favre in any position that would result in him competing with OPmobility, including in the automotive lighting industry, for a period not earlier than the period provided in the Non-Competition Provision." (Dkt. No. 2249 at pp. 43–45).

ARGUMENT

A. OPmobility Seeks Identical Relief In The First-Filed French Legal Proceeding.

The French Legal Proceeding and the Adversary Proceeding present the same legal and factual issues and seek identical relief. Under these circumstances, this Court should stay the Adversary Proceeding.

Courts in the Third Circuit stay domestic proceedings in favor of foreign proceedings on grounds of international comity where the claims involve the "same core facts and seek[] the same relief[.]" *Canada Life Assur. Co. v. Converium Ruckversicherung (DEUTSCHLAND) AG*, 2007 WL 1726565, at *2 (D.N.J. June 13, 2007); *see also Nat'l Bank of Anguilla*, 580 B.R. at 100 (granting stay on grounds of international comity where "[t]he litigation of these Adversary Proceedings involves the same subject matter and revolves around the same issues as the action[] currently being litigated before the courts in [the foreign proceedings]").

Here, OPmobility seeks the same relief in the French Legal Proceeding as it does in the Adversary Proceeding: an order enjoining any employment of Mr. Favre by Marelli and/or SVP in alleged contravention of his non-competition agreement with OPmobility. In the Prayer for Relief in Plaintiffs' Complaint in this Adversary Proceeding, OPmobility seeks "preliminary and permanent injunctive relief enjoining the Defendants" from, among other things, "employing Mr. Favre in the same or similar position to his role at OPmobility, or from employing Mr. Favre in any position that would result in him competing with OPmobility, including in the automotive lighting industry, for a period not earlier than the period provided in the Non-Competition Provision." (Dkt. No. 2249 at pp. 43–45). That is the very same relief OPmobility seeks in the French Legal Proceeding. The overlap in relief sought renders the issues in the French Legal Proceeding and the Adversary Proceeding the same for purposes of international comity and militates in favor of staying this Adversary Proceeding, especially where the core legal analysis will pertain to the interpretation of a French contract and application of French law. *Nat'l Bank of Anguilla*, 580 B.R. at 100 (finding foreign and domestic proceedings were similar and granting stay on grounds of international comity where "both United States courts and [foreign] courts provide essentially the same remedy that the Plaintiffs seek"); *Ole Media Mgmt., L.P. v. EMI Apr.*

Music, Inc., 2013 WL 2531277, at *4 (S.D.N.Y. June 10, 2013) (granting stay where "in the absence of a stay . . . both courts would be engaged in the same task").

B. The French Legal Proceeding Was Filed First And Has Reached a Later Stage Than the Adversary Proceeding

The fact that the French Legal Proceeding was filed two months before the Adversary Proceeding and held a potentially dispositive hearing on July 7, 2026 weighs in favor of a stay.

Courts "have traditionally accorded great weight to the first suit filed." *Tarazi v. Truehope Inc.*, 958 F. Supp. 2d 428, 436 (S.D.N.Y. 2013) (granting stay where Canadian action was filed two weeks prior to domestic action); *Christ*, 2007 WL 2022053, at *8 (D. Del. July 10, 2007) (finding fact that South African proceedings were filed before domestic proceedings "weigh[ed] heavily in favor of a stay pending the resolution of the South African proceedings"). Here, there is no dispute that the French Legal Proceeding was filed two months before the Adversary Proceeding. This fact, alone, weighs in favor of a stay.

In addition, the relative posture of the proceedings, and particularly the lack of progress in the Adversary Proceeding, weighs in favor of a stay. Indeed, the court held a hearing on July 7, 2026 in the French Legal Proceeding, and a potentially case-dispositive decision is expected to issue on September 22, 2026. On the other hand, the matter before this Court "is still in its infancy," *FRHUEB, Inc. v. Abdala*, 2022 WL 7150242, at *3 (S.D.N.Y. Sept. 30, 2022), as Defendants have not yet even responded to Plaintiffs' complaint. Moreover, the fact that "no discovery has been exchanged in this case . . . weighs in favor of staying the [Adversary Proceeding]." *Juchheim v. Julabo USA, Inc.*, 2023 WL 5278862, at *3 (E.D. Pa. Aug. 16, 2023).

C. France Is Unquestionably an Adequate and More Convenient Forum for Resolution of the Dispute Underlying Both Proceedings

There is no question that France is an adequate forum for resolution of the dispute underlying both this Adversary Proceeding and the first-filed French Legal Proceeding, especially

considering that the underlying core dispute relates to a French contract governed by French law. *See Bechtel Corp. v. Laborer's Int'l Union*, 544 F.2d 1207, 1215 (3d Cir. 1976) (holding that "the possibility" of relief in an alternate forum resolving the issues before the court "is sufficient justification to warrant the stay."). Moreover, Third Circuit courts have held that French courts are competent to resolve trade secret and contract claims. *Eurofins Pharma US Holdings v. BioAlliance Pharma SA*, 623 F.3d 147, 162-63 (3d Cir. 2010) (affirming France as adequate and available forum for contract and breach of fiduciary duty claims); *Ernst v. Ernst,* 722 F. Supp. 61, 67–68 (S.D.N.Y. 1989) (observing that France is an adequate forum because "there are several perfectly adequate discovery methods available under French law").

France is not only an adequate forum—it is a more convenient forum than the United States Bankruptcy Court for the District of Delaware. France is clearly the center of gravity of the dispute. Resolution of the dispute regarding Favre's non-compete involves French law and interpretation of a French law-governed Employment Agreement and the rights and obligations under a non-compete clause contained therein. Moreover, the documentary evidence and core witnesses in this case—*i.e.*, Favre and personnel of OPmobility—are all based in France. These facts uniformly weigh in favor of a stay. *See Juchheim*, 2023 WL 5278862, at *3 (finding that convenience of German forum weighed in favor of a stay where all three relevant individuals were German citizens and two resided in Germany, the Defendant company was German, and the agreement at issue was originally drafted in German and contained a German choice of law provision).

Finally, proceeding in France is more convenient because it would obviate the relief sought by Plaintiffs' motion, namely an order permitting a foreign commissioner to become involved in

international litigation in the United States to permit use of French documents in connection with Plaintiff's motion for a preliminary injunction.

D. France Has A Greater Connection to the Underlying Dispute Than The United States

Moreover, France has a greater connection to the underlying dispute than the United States. The core dispute in both the French Legal Proceeding and Adversary Proceeding involves the Employment Agreement between a French company and a French citizen and the interpretation of French law. The complaint alleges no relevant conduct within Delaware. This fact undercuts the putative connection between the dispute and Delaware as a forum. *See Windt v. Qwest Commc'ns Int'l, Inc.*, 529 F.3d 183, 193 (3d Cir. 2008) (dismissal on *forum non conveniens* grounds was justified because "there are no allegations that actions or events occurring in New Jersey gave rise to the [allegations] in this case"). There can be no serious dispute that a French court is the more appropriate forum to decide disputes regarding its own citizens, contracts, and law.

Indeed, Delaware has essentially no connection to the dispute aside from the fact that some of the Marelli subsidiaries are incorporated in Delaware. That is not sufficient. "Where the locus of a dispute is foreign, as it is here, a defendant's incorporation in the forum state is insufficient to transform the matter into a localized controversy." *Brunswick GmbH v. Bowling Switz., Inc.*, 2008 WL 2795936, at *4 (D. Del. July 18, 2008). And, while the complaint alleges that Marelli is before this Court in Delaware, and contains the vague and unspecific allegations that Defendants "regularly do or solicit business in Delaware" and "engage in other persistent courses of conduct in Delaware or derive substantial revenue from services, or things used or consumed [in] Delaware,"[3] any domestic interest that can be derived from these allegations is far outweighed by

[3] Dkt. No. 2249 ¶ 45.

France's "local interest in having localized controversies decided at home." *Nat'l Bank of Anguilla*, 580 B.R. at 102 (granting stay on grounds of international comity where "New York and the United States [had] a strong interest" in the outcome of the case but Anguillan interests outweighed domestic interests).

E. The Parties Would Be Prejudiced By Inconsistent Outcomes and Duplicative Litigation Costs, and OPmobility Would Not Be Prejudiced by a Stay

Finally, the potential prejudice that would arise from duplicative litigation in two forums outweighs any potential prejudice to OPmobility imposed by a stay of the Adversary Proceeding during the pendency of the French Legal Proceeding.

Courts regularly find in this context that "the possibility of inconsistent and/or varying outcomes . . . would prejudice the parties, as would requiring them to bear the burden and expense of litigating both overlapping actions simultaneously." *E.g., Abdala*, 2022 WL 7150242, at *3. Here, OPmobility seeks the same injunctive relief in the French Legal Proceeding and Adversary Proceeding, section A, *supra*, and Defendants would be prejudiced by the risk of inconsistent rulings on the injunctive relief sought by OPmobility in both forums. These considerations militate in favor of deference to the first-filed French Legal Proceeding. *See Eurofins*, 623 F.3d at 163 (affirming dismissal on grounds of *forum non conveniens* when related litigation was already underway in France because "litigation in France will avoid the possibility of incongruous results stemming from parallel actions"); *Ole Media Mgmt.*, 2013 WL 2531277, at *5 ("There is no doubt that [defendants are] significantly inconvenienced by allowing both actions to proceed, given the partial duplication among them . . . .").

On the other hand, OPmobility would suffer no such inconvenience or prejudice if a stay issues because it can seek the injunctive relief sought in this Adversary Proceeding in the French forum—which it has already done. *See generally*, Sections A–B, *supra*.

F. Entry of a Stay Would Promote Judicial Economy, Especially Considering Defendants' Forthcoming Motion to Dismiss

In addition to the factors set forth above, some courts also consider whether a stay on grounds of international comity would promote judicial economy. *See Ole Media Mgmt*, 2013 WL 2531277, at *4 (finding that "a stay of this action would advance the interest of judicial economy by avoiding duplicative litigation"). Here, entry of a stay in lieu of proceeding with the discovery process anticipated by Plaintiffs' motion necessarily promotes judicial economy. Moreover, these considerations are particularly salient in light of Defendants' anticipated and forthcoming motion to dismiss, which provides an independent basis to stay discovery in this matter.

Judicial economy is best served by staying premature discovery pending the Court's determination of whether the complaint should be dismissed in its entirety on grounds of *forum non conveniens*. *See e.g.*, *Eurofins Pharma U.S. Holdings, Inc. v. Bioalliance Pharma SA*, 2009 WL 2992552 (D. Del. Sept. 18, 2009) (indicating discovery stay was granted pending resolution of defendants' motion to dismiss for *forum non conveniens*). Indeed, Third Circuit law recognizes that "[m]otions to dismiss based on *forum non conveniens* usually should be decided at an early stage in the litigation, so that the parties will not waste resources on discovery and trial preparation in a forum that will later decline to exercise its jurisdiction over the case." *Lony v. E.I. Du Pont de Nemours & Co.*, 935 F.2d 604, 614 (3d Cir. 1991). Further, the Supreme Court has expressly eschewed the need for extensive fact investigation in connection with a *forum non conveniens* motion. *Sinochem Int'l Co. v. Malaysia Int'l Shipping Corp.*, 549 U.S. 422, 432 (2007) ("A district court therefore may dispose of an action by a forum non conveniens dismissal, bypassing questions of subject-matter and personal jurisdiction, when considerations of convenience, fairness, and judicial economy so warrant."). Therefore, allowing complex and burdensome discovery to

proceed before resolving Marelli's forthcoming motion to dismiss would run counter to the purpose of the *forum non conveniens* doctrine.

If the Adversary Proceeding is not stayed, the Defendants also intend to move to dismiss the complaint. It would likewise be counterproductive to proceed with substantive discovery before addressing preliminary questions that could result in the entire action being dismissed. Courts have held "a [discovery] stay is proper where the likelihood that such motion may result in a narrowing or an outright elimination of discovery outweighs the likely harm to be produced by the delay." *Weisman v. Mediq, Inc.*, 1995 WL 273678, *2 (E.D. Pa. May 3, 1995); *Kaavo Inc. v. Cognizant Tech. Sols. Corp.*, 2015 WL 1737476, at *5 (D. Del. Apr. 9, 2015) ("[T]he possibility of dramatically simplifying the case, and of realizing such simplification at a very early stage, is compelling enough to warrant grant of Defendants' [stay] motions.").

Accordingly, because delaying discovery is entirely consistent with Defendants' forthcoming motion to dismiss this Adversary Proceeding, and because avoiding duplicative litigation promotes judicial economy, a stay of this proceeding in its entirety during the pendency of the French Legal Proceeding is warranted.

G. The Court Also Has Inherent Authority to Issue a Stay

In addition to its power to stay proceedings under international comity, the Court also has inherent authority to stay proceedings before it in light of the French Legal Proceeding. *See Alameda Rsch. Ltd. v. Kives*, 2024 WL 717771, at *1 (Bankr. D. Del. Feb. 21, 2024) ("[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants." (quoting *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936))); *Smith v. Dominion Bridge Corp.*, 1999 WL 111465, at *2 (E.D. Pa. Mar. 2, 1999) (noting that "[a] federal court has discretion to exercise

its inherent power to stay the proceedings before it," including to provide international comity to pending foreign proceedings).

To the extent that the Court may exercise its inherent right to stay proceedings, the United States District Court for the District of Delaware generally looks to the following factors in consideration of a motion to stay: (1) whether a stay would unduly prejudice or present a clear tactical disadvantage to the non-moving party; (2) whether a stay will simplify the issues in question and trial of the case; and (3) whether discovery is complete and whether a trial date has been set. *See KGaA v. Hopewell Pharma Ventures, Inc.*, 2025 WL 894551, at *3 (D. Del. Mar. 24, 2025) (collecting cases).

Here, these factors are clearly met. First, as discussed previously, a stay will not unduly prejudice or present a clear tactical disadvantage to OPmobility. Section E, *supra.* Second, a stay could also simplify the issues alleged in this Adversary Proceeding, because OPmobility's claims could either be clarified or nullified. *SenoRx, Inc. v. Hologic, Inc.*, 2013 WL 144255, at *3 (D. Del. Jan. 11, 2013) (observing, in deciding a motion to stay, that there is "potential for the simplification of issues for trial[] either by reducing the number of claims at issue, confirming the validity of the surviving claims, or narrowing the scope of a modified claim"); *see* Section A, *supra*. And finally, the relative status of the two cases—namely that the first-filed French Legal Proceeding is substantially ahead of this Adversary Proceeding, section B, *supra*—weighs in favor of a stay.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court enter the proposed Order in the form attached hereto (i) denying the Commissioner Motion and (ii) granting

Defendants' Cross-Motion to Stay Proceedings on Grounds of International Comity and stay all further proceedings until further order of this Court.

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Date: July 7, 2026
Wilmington, Delaware

/s/ *Laura Davis Jones*

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: MARELLI AUTOMOTIVE LIGHTING USA LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 25-11034 (CTG) (Jointly Administered)
OPMOBILITY GESTION; OPMOBILITY SE; OPMOBILITY HOLDING USA, INC.; and OPMOBILITY LIGHTING HOLDING, Plaintiffs, v. STRATEGIC VALUE PARTNERS, LLC; MARELLI HOLDINGS CO., LTD.; MARELLI CORPORATION; MARELLI NORTH AMERICA, INC.; MARELLI HOLDING USA LLC; MARELLI TENNESSEE USA LLC; MARELLI AUTOMOTIVE LIGHTING USA LLC; and DOE DEFENDANTS 1-20, Defendants.	Adv. Pro. No. 26-50470 (CTG)

[PROPOSED] ORDER (I) DENYING PLAINTIFFS' MOTION FOR ISSUANCE OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE, APPOINTMENT OF COMMISSIONER, AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION AND (II) GRANTING DEFENDANTS' CROSS-MOTION TO STAY PROCEEDINGS ON GROUNDS OF INTERNATIONAL COMITY

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed 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.

Upon (i) the Plaintiffs' Motion for Issuance of Request for International Judicial Assistance, Appointment of Commissioner, and Direction of Submission of Hague Convention Application (the "Motion") filed by Plaintiffs OPmobility Gestion, OPmobility SE, OPmobility Holding USA, Inc., and OPmobility Lighting Holding, and (ii) the Cross-Motion to Stay Proceedings on Grounds of International Comity ("Cross-Motion to Stay") filed by Defendants Strategic Value Partners, LLC, Marelli Holdings Co., LTD., Marelli Corporation, Marelli North America, Inc., Marelli Holding USA LLC, Marelli Tennessee USA LLC, and Marelli Automotive Lighting USA LLC (collectively, "Defendants");

IT IS HEREBY ORDERED THAT:

1. The Motion is DENIED.

2. Defendants' Cross-Motion to Stay is GRANTED and this matter is STAYED in its entirety pending resolution of the French Legal Proceedings, as defined in the Cross-Motion to Stay.