Docket #0041 Date Filed: 7/16/2026

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)

CERTIFICATION OF COUNSEL REGARDING SECOND STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT

I, Stacy L. Newman, hereby certifies as follows:

1. I am a partner with the law firm Cole Schotz, which represents Defendant Strategic Value Partners, LLC in the above-captioned adversary proceeding.

[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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2. On June 16, 2026, Plaintiffs OPmobility Gestion, OPmobility SE, OPmobility Holding USA, Inc. and OPmobility Lighting Holding (collectively, the "Plaintiffs") filed an *Adversary Complaint* [Adv. D.I. 1] (the "Complaint") commencing the above-captioned adversary proceeding.

3. On June 23, 2026, Plaintiffs filed their *Motion for Issuance of Request for International Judicial Assistance, Appointment of Commissioner, and Direction of Submission of Hague Convention Application* [Adv. D.I. 18] (the "Commissioner Motion").

4. On June 24, 2026, Plaintiffs filed the *Stipulation Extending Time to Respond to the Complaint* [Adv. D.I. 20] memorializing the parties' agreement to extend the deadline for 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, the "Defendants") to respond to the Complaint until July 24, 2026.

5. On July 7, 2026, Defendants filed the *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-Motino to Stay Proceedings on Grounds of International Comity* [Adv. D.I. 28] (the "Stay Motion").

6. The Commissioner Motion and Stay Motion are scheduled to be heard by the Court on July 20, 2026 at 11:00 a.m. (ET).

7. Due to the pendency of the Stay Motion, the parties have now memorialized an agreement to further extend the Defendants' deadline to respond to the Complaint until the first business day that is fourteen days after the Court enters an order on the Stay Motion as set forth in

the stipulation (the "Stipulation") attached as Exhibit 1 to the proposed form of order, which is attached hereto as **Exhibit A** (the "Proposed Order").

8. Undersigned counsel respectfully requests that the Court approve the Stipulation and enter the Proposed Order attached hereto as **Exhibit A**.

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Date: July 16, 2026
Wilmington, Delaware

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Exhibit A

(Proposed Order)

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) **Related Docket No. ____**

ORDER APPROVING SECOND STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT

Upon consideration of the *Certification of Counsel Regarding Second Stipulation Extending Time to Respond to Complaint* and the *Second Stipulation Extending Time to Respond to Complaint* (the "Stipulation")[2]; and the Court having determined that good and adequate cause

[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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

exists for approval of the Stipulation; and the Court having determined that no further or other notice of the Stipulation need be given, it is hereby ORDERED that:

1. The Stipulation attached hereto as **Exhibit 1** is hereby approved.

2. Defendants' time to answer, move or otherwise respond to the Complaint be and hereby is extended through and including the first business day that is fourteen days after the Court enters an order on the Stay Motion, without prejudice to seek further extensions.

3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Exhibit 1

(Stipulation)

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)

SECOND STIPULATION EXTENDING TIME TO RESPOND TO THE COMPLAINT

This stipulation (the "Stipulation") is entered into by and between Defendants Strategic Value Partners, LLC (the "SVP Defendant"), Marelli Holdings Co., LTD.; Marelli Corporation; Marelli North America, Inc.; Marelli Holding USA LLC; Marelli Tennessee USA LLC; and

[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.

Marelli Automotive Lighting USA LLC (collectively, the "Marelli Defendants", and together with the SVP Defendant, the "Defendants") and Plaintiffs OPmobility Gestion; OPmobility SE; OPmobility Holding USA, Inc.; and OPmobility Lighting Holding (collectively, the "Plaintiffs", and together with the Defendants, the "Parties"). The Parties, by and through their undersigned counsel, hereby stipulate and agree as follows:

RECITALS

WHEREAS, on June 16, 2026, Plaintiffs filed an *Adversary Complaint* [Adv. D.I. 1] (the "Complaint") commencing the above-captioned adversary proceeding;

WHEREAS, on June 19, 2026, Defendants agreed to accept service with an effective date of June 24, 2026;

WHEREAS, on June 23, 2026, Plaintiffs filed their *Motion for Issuance of Request for International Judicial Assistance, Appointment of Commissioner, and Direction of Submission of Hague Convention Application* [Adv. D.I. 18] (the "Commissioner Motion");

WHEREAS, on June 24, 2026, Plaintiffs filed the *Stipulation Extending Time to Respond to the Complaint* [Adv. D.I. 20] extending the deadline for Defendants to respond to the Complaint until July 24, 2026;

WHEREAS, on July 7, 2026, Defendants filed the *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-Motino to Stay Proceedings on Grounds of International Comity* [Adv. D.I. 28] (the "Stay Motion");

WHEREAS, the United States Bankruptcy Court for the District of Delaware (the "Court") is scheduled to consider the Commissioner Motion and Stay Motion at the hearing scheduled for July 20, 2026 at 11:00 a.m. (ET);

WHEREAS, the Parties have agreed that due to the pendency of the Stay Motion, the Defendants' deadline to respond to the Complaint shall be further extended as set forth herein.

NOW, THEREFORE, IT IS STIPULATED THAT:

1. The Parties agree that the time for the Defendants to answer, move or otherwise respond to the Complaint is further extended until the first business day that is fourteen days after the Court enters an order on the Stay Motion.

2. The Parties, by and through their undersigned counsel, each represent and warrant that the undersigned is fully authorized and empowered to execute and deliver this Stipulation on behalf of, and to bind, each Party, as applicable, to the terms and conditions of this Stipulation.

3. This Stipulation may be executed in any number of counterparts, and each such counterpart is to be deemed an original for all purposes, but all counterparts shall collectively constitute one agreement. Further, electronic signatures or transmissions of an originally signed document by facsimile or electronic mail shall be as fully binding on the Parties as an original document.

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Dated: July 16, 2026
Wilmington, Delaware

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