Docket #0052 Date Filed: 7/21/2026

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) **Re: Adv. D.I. 18 & 28**

CERTIFICATION OF COUNSEL FOR (I) APPROVAL OF MOTION FOR ISSUANCE OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE, APPOINTMENT OF COMMISSIONER, AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION, AND (II) DENIAL OF CROSS-MOTION TO STAY PROCEEDINGS ON GROUNDS OF INTERNATIONAL COMITY

The undersigned counsel to Plaintiffs OPmobility Gestion, OPmobility SE, OPmobility Holding USA, Inc., and OPmobility Lighting Holding hereby certifies as follows:

[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.

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On June 23, 2026, the Plaintiffs filed the *Motion for Issuance of Request for International Judicial Assistance, Appointment of Commissioner, and Direction of Submission of Hague Convention Application* (the "Motion") [Adv. D.I. 18]. A proposed form of order was attached to the Motion (the "Original Proposed Order").

On July 7, 2026, the Defendants filed *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* (the "Cross-Motion") [Adv. D.I. 28].

On July 20, 2026, the Court held a hearing (the "Hearing") to consider the relief requested by the Motion and Cross-Motion. At the Hearing, the Court approved the Motion and denied the Cross-Motion.

Undersigned counsel has conferred with counsel to the Defendants regarding the revised Proposed Order attached hereto as **Exhibit A** (the "Revised Proposed Order"), which has been reviewed by all parties. Counsel to the Defendants have confirmed that they do not oppose the form of Revised Proposed Order. A comparison of the Revised Proposed Order against the Original Proposed Order is attached hereto as **Exhibit B**.

Accordingly, the Plaintiffs respectfully request that the Court enter the Revised Proposed Order at its earliest convenience.

[*Signature Page Follows*]

Dated: July 21, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Jacob R. Kirkham

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Attorneys for Plaintiffs OPmobility Gestion; OPmobility SE; OPmobility Holding USA, Inc.; and OPmobility Lighting Holding.

EXHIBIT A

Revised 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) **Re: Adv. D.I. 18 & 28**

ORDER (I) GRANTING PLAINTIFFS' MOTION FOR ISSUANCE OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE, APPOINTMENT OF COMMISSIONER, AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION, AND (II) DENYING 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 the *Motion for Issuance of Request for International Judicial Assistance, Appointment of Commissioner, and Direction of Submission of Hague Convention Application* (the "Motion") [Adv. D.I. 18] filed by Plaintiffs OPmobility Gestion, OPmobility SE, OPmobility Holding USA, Inc., and OPmobility Lighting Holding ("OPmobility"), requesting the issuance of a Request for International Judicial Assistance ("Request for Assistance") pursuant to 28 U.S.C. § 1781, Chapter II of the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, T.I.A.S. No. 7444, 23 U.S.T. 2555 (the "Hague Convention"), this Court's inherent authority, and in light of the comity between the United States and France, and upon considering *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* (the "Cross-Motion") [Adv. D.I. 28] and the record of the above-captioned proceeding;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.

2. The Request for Assistance attached to the Motion as **Exhibit 1** is hereby issued as the Court's Request for Assistance and is fully incorporated herein. This Court shall sign the Request for Assistance and affix the seal of the United States Bankruptcy Court for the District of Delaware over said signature.

3. Pursuant to Article 17 of the Hague Convention, Alexander Blumrosen is hereby duly appointed, pending the approval of the French Ministère de la Justice and subject to the terms of the Request for Assistance, as Commissioner to:

a. receive from OPmobility its own French-origin documents that OPmobility seeks to use in this adversary proceeding, as described in the Request for Assistance and any attachments thereto (the "French Documents");

b. transmit the French Documents to counsel for OPmobility pursuant to Article 17 of the Hague Convention and in performance of the Commissioner's appointment and duties thereunder; and

c. upon completion, inform the French Ministère de la Justice.

4. This signed Order and the signed Request for Assistance will be given to Kobre & Kim LLP, counsel for OPmobility, which will file or request the Commissioner to timely file both documents (and the exhibits thereto), along with French translations of both documents (and the exhibits thereto), with the Ministère de la Justice, Direction des Affaires Civiles et du Sceau, Département de l'entraide, du droit international privé et européen ("DEDIPE"), 13 Place Vendôme, 75042 Paris Cedex 01, France.

5. OPmobility will use its best efforts to promptly obtain the Ministère de la Justice's approval of the Court's Request for Assistance and appointment of the Commissioner. After the Ministère de la Justice's approval, OPmobility will make best efforts to begin transmitting the French Documents to the Commissioner on a rolling basis.

6. All French Documents will be subject to the protections of the applicable protective order entered in this adversary proceeding or, if no such order has been entered, subject to the protections of Local Bankruptcy Rule 9018-1(f).

7. The Commissioner will adhere to any order issued by this Court relating to document discovery in this adversary proceeding.

8. All costs of this Hague Convention process, including, without limitation, the fees of the Commissioner, translation fees for these motion papers, and any transmittal costs for the French Documents, will be borne by OPmobility. Each party will be responsible for the fees and expenses, if any, of its own attorneys relating to any proceedings arising from this Hague Convention process.

9. Neither this Order, the transmission of French Documents by OPmobility to the Commissioner, any examination of French Documents by the Commissioner, nor the terms of the Request for Assistance itself shall constitute or operate as a waiver of any argument, position, objection, allegation, claim, or defense of any party in this adversary proceeding, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of France, the United States, or applicable non-bankruptcy law.

10. The Cross-Motion is **DENIED** without prejudice.

EXHIBIT B

Comparison of Revised Proposed Order against Original Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

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IT IS HEREBY ORDERED THAT:

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9. Neither this Order, the transmission of French Documents by OPmobility to the Commissioner, any examination of French Documents by the Commissioner, nor the terms of the Request for Assistance itself shall constitute or operate as a waiver of any argument, position, objection, allegation, claim, or defense of any party in this adversary proceeding, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of France, the United States, or applicable non-bankruptcy law.

10. The Cross-Motion is **DENIED** without prejudice.