Docket #0058 Date Filed: 8/6/2026

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 SUBMITTING PROPOSED SCHEDULING ORDER

The undersigned hereby certifies as follows:

1. On June 16, 2026, Plaintiffs OPmobility Gestion; OPmobility SE; OPmobility Holding USA, Inc.; and OPmobility Lighting Holding (the "Plaintiffs") filed an Adversary

[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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Complaint commencing the above-captioned Adversary Proceeding [Adv. D.I. 1] (the "Complaint") against the above-captioned defendants, Marelli Holdings Co., Ltd., Marelli Corporation, Marelli North America, Inc., Marelli Holding USA LLC, Marelli Tennessee USA LLC, and Marelli Automotive Lighting USA LLC (together, "Marelli") and Strategic Value Partners, LLC, ("SVP" and together, the "Defendants").

2. On June 19, 2026, Defendants agreed to accept service with an effective date of June 24.

3. On June 24, 2026 the Parties filed a Stipulation Extending Time to Respond to the Complaint [Adv. D.I. 20].

4. On August 6, 2026 the Parties reached an agreement on the entry of a scheduling order setting forth certain procedures and deadlines to apply in the above-captioned adversary proceeding.

5. To promote the efficient and expeditious disposition of this Adversary Proceeding, Plaintiffs and Defendants have agreed, subject to Court approval, to the schedule set forth in the proposed Scheduling Order annexed hereto as **Exhibit 1** (the "Scheduling Order"). A proposed order to approve the Scheduling Order (the "Proposed Order") is attached hereto as **Exhibit A**.

6. Defendants consent to the entry of the Scheduling Order.

WHEREFORE, the undersigned, on behalf of the Plaintiffs, respectfully requests that the Court enter the attached Proposed Order.

[*Remainder of page intentionally left blank*]

Dated: August 6, 2026
Wilmington, Delaware

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

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)

[PROPOSED] ORDER GRANTING STIPULATED SCHEDULING ORDER

Upon consideration of the Stipulated Scheduling Order (the "Stipulation") attached hereto as **Exhibit 1**, and after due deliberation and good cause existing therefor,

[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.

IT IS HEREBY ORDERED THAT:

1. The Stipulation attached hereto as **Exhibit 1** is **GRANTED** as set forth herein.

2. The Stipulation shall become effective immediately upon entry of this Order.

3. The Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

4. A hearing on the Plaintiffs' Motion for Preliminary Injunction shall be held on _____ at __:_____ _.m. (ET).

Exhibit 1

Stipulated Scheduling 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)

STIPULATED SCHEDULING ORDER

To promote the efficient and expeditious disposition of the above-captioned adversary proceeding, **IT IS HEREBY ORDERED** that the following schedule shall apply:

[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.

1. Defendants shall file their response to the Adversary Complaint on or before **August 6, 2026**. Plaintiffs shall file their opposition to any motion to dismiss or motion to stay on or before **August 21, 2026.** Defendants shall file any reply on or before **September 3, 2026**.

2. The Parties shall file their initial disclosures pursuant to Fed. R. Civ. P. 26(a) on or before **August 17, 2026.**

3. Plaintiffs shall file their motion for a preliminary injunction on or before **August 17, 2026**, provided that the French Ministère de la Justice has appointed the Commissioner and the Commissioner has transmitted the French documents to counsel for OPmobility pursuant to Article 17 of the Hague Convention. The Parties agree that if Plaintiffs do not file their motion for a preliminary injunction on or before **August 17, 2026**, all of the below dates will be adjusted accordingly.

a. The Parties will be permitted to commence discovery upon the filing of Plaintiffs' motion for a preliminary injunction. The Parties shall cooperate and make reasonable efforts to complete fact discovery related to the motion for a preliminary injunction by **October 19, 2026.**

i. The Parties agree to cooperate in the scheduling and completion by **October 19, 2026** of up to four depositions of each of the following party groups: (a) the Marelli entities; (b) SVP; and (c) the OPmobility Plaintiffs. A deposition pursuant to a notice to an individual witness affiliated with a Party in (a), (b), or (c) will count against the limit, but depositions pursuant to subpoenas issued to third parties will not. Notwithstanding the foregoing, the Parties expressly reserve, and do not waive, any objections they could otherwise assert with respect to any noticed deposition.

ii. The Parties agree that Plaintiffs, the Marelli entities, and SVP shall each collectively be entitled to serve no more than 15 interrogatories pursuant to Fed. R. Civ. P. 33; 15 requests for admission pursuant to Fed. R. Civ. P. 36; and 20 document requests pursuant to Fed. R. Civ. P. 34.

iii. The deadline to respond to interrogatories pursuant to Fed. R. Civ. P. 33, requests for admission pursuant to Fed. R. Civ. P. 36, and requests for production of documents pursuant to Fed. R. Civ. P. 34 shall be 10 days from the date of service by email. The Parties shall

begin producing non-privileged documents identified as responsive to any of the foregoing requests within 20 days of service of the document request. The Parties will use reasonable efforts to promptly produce non-privileged documents, including any supplemental responses. The Parties shall substantially complete the production of responsive non-privileged documents by **October 1, 2026.**

iv. Following a meet and confer, any discovery disputes that the Parties are unable to resolve shall promptly be brought to the Court's attention and, in any event, no later than **October 8, 2026.**

b. To the extent Plaintiffs intend to designate any expert witness in support of their motion for a preliminary injunction, they must designate any such expert pursuant to Rule 26(a)(2), including making a report available as applicable, to Defendants for purposes of the preliminary injunction no later than **October 13, 2026**.

c. Plaintiffs shall file their motion to supplement the preliminary injunction, including additional evidence obtained through discovery in support of that motion, by **October 20, 2026.**

d. To the extent Defendants intend to designate any expert witness in response to the motion for a preliminary injunction or in rebuttal to Plaintiffs' expert designation, they must designate any such expert in accordance with Rule 26(a)(2), including making a report available as applicable, for purposes of the preliminary injunction, no later than **October 26, 2026**. Defendants must also make the expert available for deposition no later than **November 2, 2026**.

e. To the extent Plaintiffs intend to offer any expert opinions in response to Defendants' expert designation, Plaintiffs must disclose any such expert opinions in a report no later than **November 9, 2026**. Plaintiffs must make all of their experts available for a deposition no later than **November 16, 2026**.

f. Defendants shall file their opposition by **November 23, 2026.**

g. Plaintiffs shall file their reply by **December 4, 2026.**

h. The Parties agree that each Party will notify the other Parties of any potential witnesses for any preliminary injunction hearing by **December 8, 2026**, and each Party shall be provided a reasonable time to depose any individuals identified as potential witnesses who have not already been deposed, notwithstanding that such deposition will occur after the date set forth in Section 3(a).

i. The Parties may amend the dates set forth above by (i) written agreement, without Court approval; or (ii) with Court approval. The preliminary hearing date may be amended only by order of the Court.

j. Unless otherwise agreed by the Parties or ordered by the Court, all deadlines stated herein shall be computed pursuant to Rule 9006 of the Bankruptcy Rules.

k. The Parties shall appear for a hearing on Plaintiffs' motion for a preliminary injunction on a date to be set by the Court.