Docket #2581 Date Filed: 09/01/2026

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)

FCA US LLC'S LIMITED OBJECTION TO DEBTORS' DISCLOSURE STATEMENT AND RESERVATION OF RIGHTS

FCA US LLC ("FCA"), through its counsel Womble Bond Dickinson (US) LLP and Dickinson Wright PLLC, hereby files this limited objection and reservation of rights to the Disclosure Statement for the Joint Plan of Reorganization of Marelli Automotive Lighting USA LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 2511, the "Disclosure Statement"]. In support of its limited objection, FCA states as follows:

1. FCA and its global affiliates (collectively, "Stellantis") collectively constitute the Debtors' largest global customer and the Debtors' largest non-bank creditor. See Docket No. 1.

2. The feasibility of the Joint Plan of Reorganization of Marelli Automotive Lighting USA LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 2510, the "Plan"]—as currently proposed—is entirely dependent on the Debtors reaching mutually acceptable customer-accommodation agreements with Stellantis and the Debtors' other major OEM customers. *See, e.g.*, Disclosure Statement, § IV(1) ("Any failure to obtain assumed OEM Support, or any material change in its amount, form, or timing, could materially and adversely affect the Financial Projections, including the Debtors' projected revenue, profitability, cash flows,

[1] 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.

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and liquidity, and could affect the feasibility of the proposed Plan."); *id.*, VI(O), fn. 19 ("The Plan is premised on a number of assumptions, including, among others, the Debtors' ability to achieve and consummate the OEM Accommodation Agreements."); *id.,* § IX(B)(7) ("The Plan is premised, among other things, on the assumption that the Debtors will be able to consummate the OEM Accommodation Agreements. If this assumption is not met, the Restructuring Support Agreement may need to be amended, and the treatment of Claims provided for in the Plan may need to be modified.").

3. The hearing on the adequacy of the Disclosure Statement is currently scheduled for September 8, 2026, with objections due by September 1, 2026

4. As of the filing of this limited objection, the Debtors have not yet reached a mutually acceptable customer accommodation agreement with Stellantis. On information and belief, the Debtors have not yet reached mutually acceptable customer accommodation agreements with other major customers.

6. While FCA generally supports approval of the Disclosure Statement and remains hopeful that the Debtors and Stellantis will be able to reach an agreement on customer-accommodation terms, Stellantis is under no obligation to reach any such agreement with the Debtors, and FCA expressly reserves all of its rights in this regard.

7. FCA further expressly reserves its right to object to any subsequent amendments and/or supplements to the Disclosure Statement and expressly reserves its right to object to confirmation of the Plan itself.

Dated: September 1, 2026

Respectfully submitted,

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Counsel to FCA US LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 1, 2026, the undersigned caused a true copy of the foregoing Limited Objection to be served upon all parties who have registered for electronic service in these cases by filing it with the Court's CM/ECF system.

/s/ Matthew P. Ward
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