Docket #0084 Date Filed: 9/15/2026

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)

DECLARATION OF ROBERTO FIORONI IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS BASED ON FORUM NON CONVENIENS

[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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I, Roberto Fioroni, hereby declare as follows:

1. I am the Chief Financial Officer of Marelli Holdings Co., Ltd. ("Marelli Holdings"). I have held this position since May 2026. This declaration is based on my personal knowledge and review of company information, and is made to the best of my knowledge, information, and belief.

Marelli Entities

2. Marelli Holdings is a Japanese kabushiki kaisha (stock corporation). Its principal place of business is located at 2-19-4 Miyahara-Cho, Kita-ku Saitama-City 331-0812, Japan.

3. Marelli Holdings has several subsidiaries, including Marelli Corporation, Marelli North America, Inc. ("Marelli North America"), Marelli Holding USA LLC ("Marelli Holding USA"), Marelli Tennessee USA LLC ("Marelli Tennessee"), and Marelli Automotive Lighting USA LLC ("Marelli Automotive Lighting").

4. Marelli Corporation is a Japanese kabushiki kaisha with its principal place of business located at 2-19-4 Miyahara-Cho, Kita-ku Saitama-City 331-0812 Japan. Marelli North America is a Tennessee corporation with its principal place of business located at 1 Calsonic Way, Shelbyville, Tennessee 37160. Marelli Holding USA is a Michigan limited liability company with its principal place of business located at 26555 Northwestern Highway, Southfield, Michigan 48033. Marelli Tennessee is a Michigan limited liability company with its principal place of business located at 181 Bennett Drive, Pulaski, Tennessee 38478. Marelli Automotive Lighting is a Delaware limited liability company with its principal place of business located at 26555 Northwestern Highway, Southfield, MI 48033.

5. None of these Marelli entities has any employees or offices in Delaware.

Strategic Value Partners LLC

6. Strategic Value Partners LLC ("SVP") is a Delaware limited liability company with its principal place of business in Connecticut. SVP is a member of the ad hoc group of Marelli lenders in the above-captioned bankruptcy ("the Ad Hoc Group").

Laurent Favre

7. Laurent Favre is a citizen of France and the former Chief Executive Officer of OPmobility SE ("OPmobility"), a European company with its registered and administrative offices located in France. Mr. Favre currently resides in the United Kingdom.

8. On April 13, 2026, the Ad Hoc Group issued a press release, issued from Greenwich, Connecticut, in which it announced its intention to appoint Mr. Favre as Marelli's Chief Executive Officer should they acquire control of Marelli in the future.

9. On April 13, 2026, Marelli also issued a press release, issued from Saitama, Japan, announcing the appointment of Fritz Henderson as its interim Chief Executive Officer, and referring to the announcement of the Ad Hoc Group concerning Mr. Favre.

Favre's Consulting Work for the Ad Hoc Group

10. Mr. Favre has been working as a consultant of the Ad Hoc Group. Mr. Favre does not have any employment agreements with Marelli.

11. Mr. Favre's work as a consultant has primarily been undertaken from the United Kingdom. I am not aware of Mr. Favre performing any work in Delaware or traveling to Delaware in any capacity.

12. Mr. Favre's primary interactions with Marelli employees have been with Fritz Henderson, Helen Redfern, and me. Mr. Henderson resides in the United States, but not in Delaware. Ms. Redfern and I reside in the United Kingdom. To the best of my knowledge and

belief, there are no Marelli employees with whom Mr. Favre has regularly interacted, or who have access to information about Mr. Favre's consulting work, who reside in Delaware.

13. At times, Mr. Favre has communicated and met with Marelli's customers. None of these communications or meetings occurred in Delaware.

Location of Relevant Documentary Evidence

14. All of the potentially relevant documentary evidence that Marelli possesses is either (i) not located in the United States; or (ii) located on its global IT network, which is hosted on cloud-based solutions provided by third-parties located in the Netherlands, Italy and Japan. Marelli also has a small number of on-premises data centers located in Brazil, the United States, China and Italy. None of Marelli's United States-based data centers are located in Delaware.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: September 9th, 2026

Roberto Fioroni