Docusign Envelope ID: CD54F18E-88B1-8D34-8325-EAE842B85FCC

Docket #0085 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 GRÉGOIRE PAEPEGAEY 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.

I, Grégoire Paepegaey, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 18 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would testify competently to such facts.

2. I am familiar with the matters set forth herein and submit this declaration (the "Declaration") in support of the Defendants' Motion to Dismiss Based on *Forum Non Conveniens*, filed contemporaneously herewith in the above-captioned adversary proceeding.

3. Except as otherwise noted, all facts in this Declaration are based on my personal knowledge of the matters set forth herein, information gathered from my review of relevant documents, or information provided to me by colleagues at Defendant Strategic Value Partners, LLC ("SVP"). Investment funds managed by SVP are members of a group of Marelli lenders (the "Ad Hoc Group").

4. I am employed with Strategic Value Partners (UK) LLP ("SVP UK"), an affiliate of SVP, as Managing Director. I am based in the London, England office in the United Kingdom and have worked at SVP UK for 15 months.

5. SVP and SVP UK's key management personnel covering the Marelli matter primarily operate out of SVP UK's London office.

6. Principal personnel interacting with Mr. Laurent Favre in connection with the matters at issue in this adversary proceeding are Grégoire Paepegaey (Managing Director and member of the European Investment Team) and Sergei Spiridonov (Managing Director and Co-Head of SVP's European Operating Team).

7. I am a French citizen and am based in SVP UK's London, England office.

8. Mr. Spiridonov is a UK citizen based in SVP UK's London, England office.

9. SVP has offices in the United States in Connecticut and New York. SVP is organized under the laws of Delaware. SVP does not have offices in Delaware.

10. SVP's in-person interactions with Mr. Favre have been conducted primarily from SVP UK's offices in London, as well as in certain other parts of Europe, including in France. These interactions have never taken place anywhere in the United States.

11. All in-person meetings between SVP/SVP UK personnel and Mr. Favre during the recruiting process took place in Paris, France, and London, England. This includes an in-person meeting between myself and Mr. Favre in person in Paris and further meetings in London. No in-person meetings between SVP personnel and Mr. Favre took place in the United States.

12. Certain of the e-mail communications between me and Mr. Favre are conducted in French and certain oral communications between me and Mr. Favre are conducted in French.

13. I am aware that Mr. Favre currently resides in the London area and relocated to London from Paris on or about August 26, 2026.

14. Mr. Favre and the Ad Hoc Group entered into a consultancy agreement in February 2026, which was amended in April 2026, effective as of May 1, 2026. The consultancy agreement is governed by English law.

15. In connection with his consultancy with SVP, Mr. Favre has traveled primarily within Europe, mostly in Germany and Italy, to visit Marelli facilities. Mr. Favre has also visited the Czech Republic, China and Poland in connection with his consultancy with SVP. None of these meetings took place in the United States.

16. It would be significant in terms of both time and financial cost for SVP's and SVP UK's key management personnel covering the Marelli matter to travel to the United States for purposes of litigation in Delaware. Such travel would take them away from their work

responsibilities for extended periods and impose a substantial burden on SVP's and SVP UK's operations.

17. SVP's and SVP UK's documents and electronically stored information relevant to this proceeding are maintained electronically on servers located in part in the United Kingdom.

18. The applicable data protection laws in the European Union and the United Kingdom, including but not limited to the EU General Data Protection Regulation (the "EU GDPR"), the EU GDPR as it forms part of the laws of the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act of 2018 and as amended (the "UK GDPR"), makes it more difficult to transfer personal data information concerning Mr. Favre to the United States for purposes of U.S. litigation than it would if the litigation was in France.

19. SVP affirmatively consents to personal jurisdiction in France for claims arising from the same facts alleged in the Amended Complaint in this adversary proceeding and will not contest personal jurisdiction in France.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 15, 2026.

Signed by:
Grégoire Paepegaey
8A1470E47D7443F...
Grégoire Paepegaey