Docket #0093 Date Filed: 9/25/2026

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 ("Plaintiffs") filed an *Adversary Complaint*

[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.

2511034260925000000000001

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, "Defendants"). Plaintiffs filed an *Amended Adversary Complaint* on August 21, 2026 [Adv. D.I. 68].

2. On August 21, 2026, Defendants were served with the *Amended Adversary Complaint* [Adv. D.I. 68] as well as Plaintiffs' Trade Secret Disclosure [Adv. D.I. 69].

3. On September 11, 2026, Defendants filed the *Defendants' Motion to Dismiss the First Amended Complaint for Failure to State a Claim Under Rule 12(b)(6)* [Adv. Proc. No. 81] (the "Motion to Dismiss"). The deadline for Plaintiffs to respond to the Motion to Dismiss is September 25, 2026.

4. On September 15, 2026, Defendants filed the *Defendants' Motion to Dismiss Based on Forum Non Conveniens* [Adv. Proc. No. 83] (the "FNC Motion"). The deadline for Plaintiffs to respond to the FNC Motion is September 29, 2026.

5. On September 24, 2026 the Parties reached an agreement on the entry of a scheduling order setting forth certain procedures and deadlines to apply to the briefing on the Motion to Dismiss and FNC Motion.

6. 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**.

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

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

[*Remainder of page intentionally left blank*]

Dated: September 25, 2026
Wilmington, Delaware

KOBRE & KIM LLP

/s/ *Jacob R. Kirkham*

Jacob R. Kirkham (No. 5768)
Stephen J. Astringer (No. 6375)
Danielle Bateman (admitted *pro hac vice*)
600 North King Street, Suite 501
Wilmington, Delaware 19801
Telephone: (302) 518-6460
Facsimile: (302) 518-6461
jacob.kirkham@kobrekim.com
stephen.astringer@kobrekim.com
danielle.bateman@kobrekim.com

-and-

Michael Ng (admitted *pro hac vice*)
Daniel A. Zaheer (admitted *pro hac vice*)
Lauren Cole (admitted *pro hac vice*)
150 California Street, 19th Floor
San Francisco, CA 94111
Telephone: (415) 582-4800
Facsimile: (415) 582-4811
michael.ng@kobrekim.com
daniel.zaheer@kobrekim.com
lauren.cole@kobrekim.com

-and-

Adam M. Lavine (admitted *pro hac vice*)
George Stamatopoulos (admitted *pro hac vice*)
Jessica K. Fender (admitted *pro hac vice*)
Zachary Sizemore (admitted *pro hac vice*)
800 Third Avenue
New York, NY 10022
Telephone: (212) 488-1200
Facsimile: (212) 488-1220
adam.lavine@kobrekim.com
george.stamatopoulos@kobrekim.com
jessica.fender@kobrekim.com
zachary.sizemore@kobrekim.com

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 SCHEDULING ORDER

Upon consideration of the proposed Scheduling Order (the "Scheduling Order") 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 Scheduling Order attached hereto as **Exhibit 1** is **GRANTED**.

2. The Scheduling Order 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.

EXHIBIT 1

Proposed Scheduling Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: MARELLI AUTOMOTIVE LIGHTING USA LLC, *et al.*,[2] 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)

AGREED 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:

[2] 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 filed a motion to dismiss ("Motion to Dismiss") the Amended Complaint [Adv. D.I. 68], under Rule 12 of the Federal Rules of Civil Procedure ("Federal Rules") as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), on **September 11, 2026** [Adv. D.I. No. 81]. Plaintiffs shall file their opposition to the Motion to Dismiss by **October 9, 2026.** Defendants shall file any reply to the Motion to Dismiss by **October 30, 2026**.

2. Defendants filed a motion to dismiss pursuant to *forum non conveniens* ("FNC Motion") on **September 15, 2026** [Adv. D.I. No. 83]. Plaintiffs shall file their opposition to the FNC Motion by **October 13, 2026**. Defendants shall file their reply to the FNC Motion by **November 3, 2026**.