

ENTERED

February 01, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
IEH AUTO PARTS HOLDING LLC, <i>et al.</i> , ¹)	Case No. 23-90054 (CML)
)	
Debtors.)	(Jointly Administered)

**ORDER (I) AUTHORIZING THE DEBTORS TO
(A) CONTINUE INSURANCE COVERAGE ENTERED INTO PREPETITION
AND SATISFY RELATED PREPETITION OBLIGATIONS,
(B) RENEW, AMEND, SUPPLEMENT, EXTEND, OR PURCHASE INSURANCE
POLICIES, (C) CONTINUE TO PAY BROKERAGE FEES, AND (D) MAINTAIN
THE CUSTOMS BOND PROGRAM, AND (II) GRANTING RELATED RELIEF**

After notice and hearing on the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”) (a) authorizing the Debtors to (i) continue insurance coverage entered into prepetition and satisfy related prepetition obligations in the ordinary course of business, (ii) renew, amend, supplement, extend, or purchase insurance coverage in the ordinary course of business on a postpetition basis, (iii) satisfy payment of prepetition obligations on account of and continue to pay Brokerage Fees, and (iv) maintain the Customs Bond Program on an uninterrupted basis and (b) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court finding that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; that this is a core

¹ The Debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity’s federal tax identification number, are: IEH Auto Parts Holding LLC (6529); AP Acquisition Company Clark LLC (4531); AP Acquisition Company Gordon LLC (5666); AP Acquisition Company Massachusetts LLC (7581); AP Acquisition Company Missouri LLC (7840); AP Acquisition Company New York LLC (7361); AP Acquisition Company North Carolina LLC (N/A); AP Acquisition Company Washington LLC (2773); Auto Plus Auto Sales LLC (6921); IEH AIM LLC (2233); IEH Auto Parts LLC (2066); IEH Auto Parts Puerto Rico, Inc. (4539); and IEH BA LLC (1428). The Debtors’ service address is: 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144.

² Capitalized terms used but not otherwise defined have the meanings given to them in the Motion.



proceeding pursuant to 28 U.S.C. § 157(b)(2); that this Court may enter a final order; and that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is ORDERED THAT:

1. The Debtors are authorized, but not directed, to continue the Insurance Policies including, without limitation, the Insurance Policies identified on **Exhibit 1**, and any related agreements, including the Insurance Standby Letters of Credit, and to pay any prepetition or postpetition obligations related to the Insurance Policies, including any amounts owed to the Insurance Brokers, under the Insurance Standby Letters of Credit, and pursuant to the Insurance Policy Audits.

2. The Debtors are authorized to renew, amend, supplement, and/or extend the Insurance Policies, and to purchase new insurance policies in the ordinary course of business, and to execute other agreements in connection therewith, including letters of credit.

3. The Debtors are authorized to maintain the Customs Bond Program without interruption, including, without limitation, payment of the Customs Premiums and the Customs Brokerage Fees, and any other agreements related to the Customs Bond Program, including the Customs Bond, and to pay any prepetition or postpetition obligations related to the Customs Bond Program.

4. The Debtors are authorized to renew, amend, supplement, and/or extend the Customs Bonds, including, the Customs Bonds, or to purchase new Customs Bonds, and to execute other agreements, such as letters of credit, in connection with the Customs Bond Program.

5. The Debtors will notify the U.S. Trustee and any statutory committee appointed in these chapter 11 cases if the Debtors renew, amend, supplement, extend, terminate, replace, increase, or decrease existing insurance and Customs coverage or change insurance or Customs carriers, enter into any new agreements in connection with the Insurance Policies, the Customs Bond Program and related payment obligations, or obtain additional insurance or Customs coverage.

6. The Debtors shall maintain a matrix/schedule of payments related to the Insurance Policies, the Customs Bond Program, and related payment obligations made pursuant to this Order, including the following information: (a) the names of the payee; (b) the nature, date, and amount of the payment; (c) the category or type of payment, as further described and classified in the Motion; and (d) the Debtor or Debtors that made the payment. The Debtors shall provide a copy of such matrix/schedule to the U.S. Trustee and any statutory committee appointed in these chapter 11 cases every other 30 days beginning upon entry of this Order.

7. Notwithstanding anything else contained herein, (a) any relief granted herein, including any payment to be made or authorization contained hereunder, shall be subject in all respects to the terms and conditions of, including all requirements imposed upon the Debtors under, any interim or final order of the Court in these chapter 11 cases approving the postpetition secured financing facility and authorizing the use of cash collateral (as may be modified, amended or supplemented, the “DIP Orders”) (including, without limitation, the budget required in connection therewith) the DIP Term Sheet, and the DIP Documents (each as defined in the DIP

Orders) approved therein and (b) to the extent there is any inconsistency between the terms and conditions of such DIP Orders or DIP Documents and any action taken or proposed to be taken hereunder, the terms and conditions of such DIP Orders, the DIP Term Sheet, or DIP Documents shall control.

8. Notwithstanding the relief granted and any actions taken pursuant to such relief, nothing contained in the Motion or this Order shall constitute, nor is it intended to constitute: (a) an admission as to the validity, priority, or amount of any particular claim against a Debtor entity; (b) a waiver of the Debtors' right to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim or finding that any particular claim is an administrative expense claim or other priority claim; or (d) an implication or admission that any particular claim is of a type specified or defined in this Order or the Motion. Any payment made pursuant to this Order should not be construed as an admission as to the validity, priority, or amount of any particular claim or a waiver of the Debtors' or any other party in interest's rights to subsequently dispute such claim.

9. Notwithstanding the relief granted or any actions taken pursuant to this Order, nothing contained in this Order shall create any rights in favor of, or enhance the status of any claim held by, any person to whom any obligations under the Insurance Policies are owed.

10. The contents of the Motion satisfy the requirements of Bankruptcy Rule 6003(b).

11. Notice of the Motion as provided is be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules are satisfied by such notice.

12. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

13. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

14. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: February 01, 2023



Christopher Lopez
United States Bankruptcy Judge

Exhibit 1

Insurance Policies¹

¹ The Debtors request authority to honor existing Insurance Policies and renew Insurance Policies, as applicable, regardless of whether the Debtors inadvertently failed to include a particular Insurance Policy on this exhibit.

Insurance Carrier	Type of Coverage	Policy Numbers	Effective Date	End Date
ACE American Insurance Company	Workers' Compensation	WLRC50677734	12/1/2022	12/1/2023
Indemnity Insurance Company of North America	Workers' Compensation	WLRC50677837	12/1/2022	12/1/2023
ACE Fire Underwriters Insurance Company	Workers' Compensation	SCFC50677928	12/1/2022	12/1/2023
ACE American Insurance Company	Workers' Compensation	WCUC50677989	12/1/2022	12/1/2023
ACE American Insurance Company	Auto Liability	ISAH10692039	12/1/2022	12/1/2023
ACE American Insurance Company	General Liability	XSLG47300782	12/1/2022	12/1/2023
Navigators Insurance Company	Umbrella	NY22EXC919212IV	12/1/2022	12/1/2023
Berkley National Insurance Company	Excess Liability	CEX0960245606	12/1/2022	12/1/2023
Allied World Assurance Company (US) Inc	Excess Liability	0311-0109	12/1/2022	12/1/2023
National Union Fire Ins Co of Pittsburgh PA	Excess Liability	080852727	12/1/2022	12/1/2023
Continental Insurance Company	Excess Liability	FFX 7036108564	12/1/2022	12/1/2023
Fireman's Fund Insurance Company	Excess Liability	USL019972226	12/1/2022	12/1/2023
Great American Security Insurance Co	Excess Liability	EXC 4691183	12/1/2022	12/1/2023
Ohio Casualty Insurance Company	Excess Liability	ECO (23) 58337599	12/1/2022	12/1/2023
ACE American Insurance Company	Defense Base Act	ENID42188311003	12/1/2022	12/1/2023
Ironshore Specialty Insurance Company	Fiduciary	PT7NACEZ4E002	12/1/2022	12/1/2023
National Union Fire Ins Co of Pittsburgh PA	Fiduciary	018321790	12/1/2022	12/1/2023
Beazley Insurance Company Inc	Crime	V29716220401	12/1/2022	12/1/2023
Beazley Insurance Company Inc	Excess Crime	FID 0891695-04	12/1/2022	12/1/2023

Insurance Carrier	Type of Coverage	Policy Numbers	Effective Date	End Date
Zurich American Insurance Company	Lawyer Professional Liability	EOG 0286006-06	12/1/2022	12/1/2023
QBE Specialty Insurance Co	Cyber Liability	130001856	12/1/2022	12/1/2023
Indian Harbor Insurance Co	Excess Cyber Risk	MTE903997503	12/1/2022	12/1/2023
Markel Bermuda Limited	Employment Practices	MKLB25GPL0004262	12/1/2022	12/1/2023
Landmark American Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	LHD928502	12/8/2022	12/8/2023
Westchester Surplus Lines Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	D39162052 001	12/8/2022	12/8/2023
Allianz Global Risks US Insurance Company	Property	USP00100222	12/8/2022	12/8/2023
National Fire & Marine Insurance Company	Property	42-PRP-325831-01	12/8/2022	12/8/2023
AXA/2003 XLC Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023
BRT 2987 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023
CANOPIUS HOLDINGS/4444 CNP Lloyd's Syndicate/Canopius Underwriting Agency, Inc	Property	B72804BAA	12/8/2022	12/8/2023
StarStone Specialty Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	H82737221CSP	12/8/2022	12/8/2023
DUW 1729 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023
APL 1969 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023
BRT 2988 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023
QBE Property Facility 100% QBE UK Limited/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023
Aspen Specialty Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	PX00UGR22	12/8/2022	12/8/2023
Evanston Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	MKLV1XPR000510	12/8/2022	12/8/2023
AFB Facility/Marsh Limited	Property	BOWPN2251753	12/8/2022	12/8/2023

Insurance Carrier	Type of Coverage	Policy Numbers	Effective Date	End Date
Endurance Worldwide Insurance Ltd	Property	BOWPN2252051	12/8/2022	12/8/2023
AFB 0623/2623 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251754	12/8/2022	12/8/2023
Swiss Re Corporate Solutions Elite Insurance corporation	Property	NAP 2003082 04	12/8/2022	12/8/2023
Alcor Underwriting Bermuda Limited/Lloyds Consortium 4612/Marsh Bermuda	Property	22ALC641010A	12/8/2022	12/8/2023
KII 1618 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2251754	12/8/2022	12/8/2023
Convex/Marsh Limited	Property	BOWPN2252012	12/8/2022	12/8/2023
HDU 0382 Lloyd's Syndicate/Marsh Limited	Property	BOWPN2252012	12/8/2022	12/8/2023
Starr Surplus Insurance Company	Loss Control Inspection	2022173NY	12/1/2022	12/1/2023
Starr Surplus Insurance Company	Loss Control Inspection	2022172NY	12/1/2022	12/1/2023
ACE American Insurance Company	Environmental	PPLG71466140003	12/8/2022	12/8/2023
Ironshore Specialty Insurance Company	Environmental	G71466140 003	12/8/2022	12/8/2023
AGCS Marine Insurance Company	Cargo Stock thru-put	OC91784900	12/8/2022	12/8/2023
Indemnity Insurance Company of North America	Cargo Stock thru-put	N10763113	12/8/2022	12/8/2023
Liberty Mutual Insurance Company	Cargo Stock thru-put	OMCGC11896202	12/8/2022	12/8/2023
Continental Insurance Company	Cargo Stock thru-put	OC26-1835	12/8/2022	12/8/2023
State National Insurance Company Inc/Canopus Underwriting Agency, Inc	Cargo Stock thru-put	SMCZ14596DAA	12/8/2022	12/8/2023
Swiss Re Corporate Solutions Elite Insurance corporation	Property	NAP 2003082 03	12/1/2022	12/8/2022
Interstate Fire & Casualty Company/Victor O. Schinnerer & Company, Inc.	Property	RTX20027021	12/1/2022	12/8/2022
Allianz Global Risks US Insurance Company	Property	USP00100221	12/1/2022	12/8/2022

Insurance Carrier	Type of Coverage	Policy Numbers	Effective Date	End Date
StarStone Specialty Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	H82737210CSP	12/1/2022	12/8/2022
AXA/2003 XLC Lloyd's Syndicate/Marsh Limited	Property	BOWPN2151558	12/1/2022	12/8/2022
HISCOX GROUP/0033 HIS Lloyd's Syndicate/Marsh Limited	Property	BOWPN2151559	12/1/2022	12/8/2022
CANOPIUS HOLDINGS/4444 CNP Lloyd's Syndicate/Canopus Underwriting Agency, Inc	Property	B72804AAA	12/1/2022	12/8/2022
Alcor Underwriting Bermuda Limited/Lloyds Consortium 4612/Marsh Bermuda	Property	21ALC494660A	12/1/2022	12/8/2022
Evanston Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	MKLV1XPR000243	12/1/2022	12/8/2022
Landmark American Insurance Company/AmWINS Brokerage of Georgia, LLC	Property	LHD921247	12/1/2022	12/8/2022
ACE American Insurance Company	Environmental	PPIG71466140002	12/1/2022	12/8/2022
AGCS Marine Insurance Company	Cargo Stock thru-put	OC91784900	12/1/2022	12/8/2022
Chubb Indemnity Insurance Company	Cargo Stock thru-put	N10763113	12/1/2022	12/8/2022
Continental Casualty Company	Cargo Stock thru-put	NYOMC11896201	12/1/2022	12/8/2022
Liberty Mutual Insurance Company	Cargo Stock thru-put	OC261835	12/1/2022	12/8/2022
State National Insurance Company Inc/Canopus Underwriting Agency, Inc	Cargo Stock thru-put	DWMZ14596CAA	12/1/2022	12/8/2022