

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)
)	
Wind-Down Debtors.)	(Jointly Administered)
)	

CERTIFICATE OF NO OBJECTION

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel to US Pack Parts LLC (“US Pack”) certifies as follows:

1. On August 11, 2023, US Pack filed and served via CM/ECF and electronic mail to counsel to the Debtors, the *Application of US Pack Parts LLC for Allowance and Payment of Administrative Expense Claim* [Docket No. 853] (the “Application”).
2. The deadline for parties to file a response to the Application was Friday, September 1, 2023. No formal objections to the Application were filed on the docket.
3. However, counsel to the above-captioned Debtors and wind-down debtors (collectively, the “Wind-Down Debtors”) informally objected to the Application via electronic mail. US Pack and the Wind-Down Debtors have reached an agreement on a revised form of order granting the Application, which is attached hereto. A redline of the revised order marked against the form of proposed order filed with the Application is attached hereto as **Exhibit A**.

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.



4. The undersigned counsel certifies that all known objections, whether formal or informal, to the Application have been resolved by the proposed form of order attached hereto.

5. Accordingly, US Pack requests that the Court enter the proposed order attached hereto as at the earliest convenience of the Court.

Respectfully submitted this 13th day of November 2023.

GRAY REED

By: /s/ Micheal W. Bishop

Micheal W. Bishop

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COUNSEL TO US PACK PARTS LLC

Certificate of Service

The undersigned hereby certifies that on the 13th day of November 2023, he caused a true and correct copy of the foregoing document to be served via the Court's CM/ECF Notification System on all parties who have subscribed for notice in this case, and via e-mail on counsel to the Wind-Down Debtors.

/s/ Micheal W. Bishop

Micheal W. Bishop

Exhibit A

Redline of Order

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

**AGREED ORDER GRANTING THE APPLICATION OF US PACK PARTS LLC
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**
(Relates to Docket No. 853—)

Upon the Application (the “Application”) of US Pack Parts LLC (“US Pack”) for Allowance and Payment of Administrative Expense Claim pursuant to 11 U.S.C. § 503(b)(1)(A); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court finding that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is permissible pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the notice of the Application was appropriate under the circumstances and no other notice need be provided; and this Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**²

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 defined herein have the meanings ascribed to such terms in the Application.

1. The Application is **GRANTED** [as set forth herein](#), and US Pack is hereby granted an allowed administrative expense claim pursuant to 11 U.S.C. § 503(b) in the amount of \$~~156,986.93~~~~73,331.02~~.

2. US Pack is authorized to apply the sum of \$74,962.20 that was paid postpetition by the Debtors that US Pack is currently holding to the outstanding invoices attached as Exhibit A to the Application, which will reduce the US Pack allowed claim herein to \$~~156,986.93~~~~73,331.02~~.

3. The Debtors shall pay the amount of \$~~156,986.93~~~~73,331.02~~ to US Pack no later than five (5) business days following the date of entry of this Order [as authorized in the confirmed plan in these cases](#).

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

Signed: _____, 2023

Christopher M. López
United States Bankruptcy Judge

AGREED AS TO FORM AND CONTENT:

GRAY REED

By: /s/ Micheal W. Bishop
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Counsel to the Debtors and Wind-Down Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
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1. The Application is **GRANTED** as set forth herein, and US Pack is hereby granted an allowed administrative expense claim pursuant to 11 U.S.C. § 503(b) in the amount of \$156,986.93.

2. US Pack is authorized to apply the sum of \$74,962.20 that was paid postpetition by the Debtors that US Pack is currently holding to the outstanding invoices attached as Exhibit A to the Application, which will reduce the US Pack allowed claim herein to \$156,986.93.

3. The Debtors shall pay the amount of \$156,986.93 to US Pack no later than five (5) business days following the date of entry of this Order as authorized in the confirmed plan in these cases.

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

Signed: _____, 2023

Christopher M. López
United States Bankruptcy Judge

AGREED AS TO FORM AND CONTENT:

GRAY REED

By: /s/ Micheal W. Bishop
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