

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

**IN RE:** § **Chapter 11**  
§  
**IEH AUTO PARTS HOLDING LLC, et al.,<sup>1</sup>** § **Case No. 23-90054 (CML)**  
§  
**DEBTORS.** § **(Jointly Administered)**

**STIPULATION AND AGREED ORDER  
FURTHER EXTENDING THE UNITED STATES TRUSTEE’S DEADLINE TO  
OBJECT TO THE FIRST AND FINAL FEE APPLICATION OF THE LAW OFFICE OF  
LIZ FREEMAN FOR ALLOWANCE AND PAYMENT OF FEES AND EXPENSES AS  
CO-COUNSEL AND CONFLICTS COUNSEL TO THE DEBTORS FOR THE PERIOD  
FROM JANUARY 31, 2023 THROUGH JUNE 16, 2023 [ECF 991]**

*This Stipulation and Agreed Order Extending the United States Trustee’s Deadline to Object to the First and Final Fee Application of the Law Offices of Liz Freeman for Allowance and Payment of Fees and Expenses as Co-Counsel and Conflicts Counsel to the Debtors for the Period from January 31, 2023 Through June 16, 2023 is entered into by and among the Law Office of Liz Freeman, PLLC (the “Applicant”), and the United States Trustee (“UST” and together with the Applicant, the “Parties”).*

WHEREAS, on January 31, 2023, the Debtors filed the above-captioned chapter 11 bankruptcy cases which are jointly administered under Case No. 23-90054 (collectively, the “Chapter 11 Cases”).

---

<sup>1</sup> 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.



WHEREAS, On March 2, 2023, the Debtors filed the *Application to Retain the Law Office of Liz Freeman, PLLC as Co-Counsel and Conflicts Counsel for the Debtors and Debtors in Possession* [Docket No. 183] (the “Retention Application”), which was approved on April 3, 2023 pursuant to the *Order Authorizing the Retention and Employment of the Law Office of Liz Freeman, PLLC, as Co-Counsel and Conflicts Counsel for the Debtors and Debtors in Possession* [Docket No. 320] (“Retention Order”).

WHEREAS, on November 11, 2023, Applicant filed its *First and Final Fee Application of the Law Offices of Liz Freeman for Allowance and Payment of Fees and Expenses as Co-Counsel and Conflicts Counsel to the Debtors for the Period from January 31, 2023 Through June 16, 2023* [Docket No. 991] (the “Fee Application”).

WHEREAS, the UST has raised concerns related to the Fee Application.

WHEREAS, the Parties previously stipulated to extend the deadline to object to the Fee Application to December 15, 2023 (the “Deadline”).

WHEREAS, the Parties agree to further extend the UST’s Deadline to January 16, 2024.

**Accordingly, it is hereby AGREED and, upon approval of the Court, ORDERED that:**

1. The UST’s Deadline to object to the Fee Application is hereby extended to January 16, 2024.
2. The Deadline may be further extended by the agreement of the Parties in the form of a stipulation filed on the docket for these chapter 11 cases.
3. All rights of the Parties with respect to the Application are hereby preserved.

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

Dated: December \_\_, 2023

---

THE HONORABLE CHRISTOPHER M. LOPEZ  
UNITED STATES BANKRUPTCY JUDGE

**AGREED TO AND  
ENTRY REQUESTED:**

KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE

By: /s/Jayson B. Ruff  
Jayson B. Ruff  
Trial Attorney  
Michigan Bar No. P69893  
515 Rusk, Ste. 3516  
Houston, TX 77002  
Telephone: (713) 718-4650  
Email: [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)

*Counsel for the U.S. Trustee*

LAW OFFICE OF TOM  
KIRKENDALL

By: /s/Thomas Kirkendall  
Thomas Kirkendall  
(TX Bar No. 11517300)  
2 Violetta Ct.  
The Woodlands, TX 77381-4550  
Tel: (713) 703-3536  
Email: [bigtkirk@gmail.com](mailto:bigtkirk@gmail.com)

*Counsel for the Law Office of Liz  
Freeman*