

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

)	Chapter 11
In re:)	
)	Case No. 23-90055 (CML)
AUTO PLUS AUTO SALES LLC, ¹)	
)	(Formerly Jointly Administered under
Wind-Down Debtor.)	Lead Case IEH Auto Parts Holding LLC,
)	Case No. 23-90054)
)	Re: Docket No. 1030, Case No. 23-90054

**CERTIFICATE OF NO OBJECTION REGARDING WIND-DOWN
DEBTORS’ MOTION FOR ENTRY OF AN ORDER AUTHORIZING
THE WIND-DOWN DEBTORS TO SEAL MCCRARY STIPULATION**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned wind down debtor (the “Wind-Down Debtor”) certifies as follows:

1. On January 4, 2024, the Wind-Down Debtor filed the *Wind-Down Debtors’ Motion for Entry of an Order Authorizing the Wind-Down Debtors to Seal McCrary Stipulation* [Case No. 90054, Docket No. 1030] (the “Motion”).

2. The deadline for parties to file objections or responses to the Motion was January 25, 2024 (the “Objection Deadline”). No objections were filed on the docket on or before the Objection Deadline and counsel to the Wind-Down Debtors did not receive any informal responses.

¹ The Wind-Down Debtor’s service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor’s claims and noticing agent at <https://www.kcellc.net/autoplus>.



3. The Wind-Down Debtors request that the Court enter the attached proposed order at its earliest convenience. As reflected in the attached redline, the revised proposed order revises the case caption.

Houston, Texas
Dated: February 1, 2024

/s/ Emily Meraia

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Counsel to the Wind-Down Debtor

Certificate of Service

I certify that on February 1, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Emily Meraia

Emily Meraia

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

<p>In re:</p> <p style="margin-left: 40px;">AUTO PLUS AUTO SALES LLC,¹</p> <p style="margin-left: 80px;">Wind-Down Debtor.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 23-90055 (CML)</p> <p>(Formerly Jointly Administered under Lead Case IEH Auto Parts Holding LLC, Case No. 23-90054)</p> <p>Re: Docket No. 1030, Case No. 23-90054</p>
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**ORDER AUTHORIZING THE
WIND-DOWN DEBTORS TO SEAL MCCRARY STIPULATION**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors” before the Effective Date and “Wind-Down Debtors” after the Effective Date) for entry of an order (this “Order”): authorizing the Wind-Down Debtors to file under seal the Stipulation; all as more fully set forth in the Motion; 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 that this Court 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 Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Wind-Down Debtors, their creditors, and other parties in interest; and this Court having found that the Wind-Down Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having determined that the legal

¹ The Wind-Down Debtor’s service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor’s claims and noticing agent at <https://www.kccllc.net/autoplus>.

² Capitalized terms used but not otherwise defined herein shall have the same meanings ascribed to such terms in the Motion.

and factual bases set forth in the Motion 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 ORDERED THAT:

1. The Wind-Down Debtors are authorized to file the Stipulation under seal pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9037-1.

2. The Stipulation shall remain confidential, and shall not be made available to anyone, other than as provided in this Order or further order from the Court.

3. The Wind-Down Debtors are authorized to cause an unsealed copy of the Stipulation to be served on and/or made available, on a confidential basis, to (a) the Court, (b) the U.S. Trustee, (c) GUC Trustee; (d) any insurer that issued any of the insurance policies under which coverage is sought in connection with the Claimant's claim; and (e) any other party as may be ordered by the Court.

4. Any party who receives the Stipulation in accordance with this Order shall not disclose or otherwise disseminate this information to any other person or entity, including in response to a request under the Freedom of Information Act without the prior written consent of the Wind-Down Debtors.

5. The requirements set forth in Bankruptcy Local Rule 9013-1 and Bankruptcy Local Rule 9037-1 are satisfied by the contents of the Motion.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

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

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

Dated: _____, 2024

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

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

	}	
In re:)	Chapter 11
)	Case No. 23-90055 (CML)
<u>AUTO PLUS AUTO SALES LLC,¹</u>)	(Formerly Jointly Administered under
<u>Wind-Down Debtor.</u>)	Lead Case IEH Auto Parts Holding LLC,
)	Case No. 23-90054)
<u>IEH AUTO PARTS HOLDING LLC, et al.,¹</u>)	Re: Docket No. 1030, Case No. 23-90054
<u>Debtors.</u>)	(CML)
)	(Jointly Administered)

**ORDER AUTHORIZING THE
WIND-DOWN DEBTORS TO SEAL MCCRRARY STIPULATION**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors” before the Effective Date and “Wind-Down Debtors” after the Effective Date) for entry of an order (this “Order”): authorizing the Wind-Down Debtors to file under seal the Stipulation; all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found

¹ The Wind-Down Debtor’s service address is: 5330 Carmel Crest Lane, Charlotte, North Carolina 28226. All pleadings related to these chapter 11 cases may be obtained from the website of the Wind Down Debtor’s claims and noticing agent at <https://www.kccllc.net/autoplus>.

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 herein shall have the same meanings ascribed to such terms in the Motion.

that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court 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 Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Wind-Down Debtors, their creditors, and other parties in interest; and this Court having found that the Wind-Down Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having determined that the legal and factual bases set forth in the Motion 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 ORDERED THAT:

1. The Wind-Down Debtors are authorized to file the Stipulation under seal pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9037-1.

2. The Stipulation shall remain confidential, and shall not be made available to anyone, other than as provided in this Order or further order from the Court.

3. The Wind-Down Debtors are authorized to cause an unsealed copy of the Stipulation to be served on and/or made available, on a confidential basis, to (a) the Court, (b) the U.S. Trustee, (c) GUC Trustee; (d) any insurer that issued any of the insurance policies under which coverage is sought in connection with the Claimant's claim; and (e) any other party as may be ordered by the Court.

4. Any party who receives the Stipulation in accordance with this Order shall not disclose or otherwise disseminate this information to any other person or entity, including in

response to a request under the Freedom of Information Act without the prior written consent of the Wind-Down Debtors.

5. The requirements set forth in Bankruptcy Local Rule 9013-1 and Bankruptcy Local Rule 9037-1 are satisfied by the contents of the Motion.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

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

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

Dated: _____, 2024

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE