

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

<hr style="border: 0.5px solid black;"/> <p>In re:</p> <p>AUTO PLUS AUTO SALES LLC,¹</p> <p style="text-align: center;">Wind-Down Debtor.</p> <hr style="border: 0.5px solid black;"/>)	Chapter 11
)	
)	Case No. 23-90055 (CML)
)	
)	(Formerly Jointly Administered under
)	Lead Case IEH Auto Parts Holding LLC,
)	Case No. 23-90054)
)	RE: Docket No. 261

**CERTIFICATE OF NO OBJECTION REGARDING
PLAN AGENT’S MOTION FOR ENTRY OF AN ORDER AUTHORIZING
THE PLAN AGENT TO MERGE WIND-DOWN DEBTOR’S 401(K) PLAN**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel certifies as follows:

1. On February 11, 2025, the Plan Agent² filed the *Plan Agent’s Motion for Entry of an Order Authorizing the Plan Agent to Merge Wind-Down Debtor’s 401(k) Plan* [Docket No. 261] (the “Motion”).
2. The deadline for parties to file objections or responses to the Motion was March 4, 2025 (the “Objection Deadline”). No objections were filed on the docket on or before the Objection Deadline and counsel to the Plan Agent did not receive any informal responses.
3. The Plan Agent requests that the Court enter the attached proposed order at its earliest convenience.

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.kccellc.net/autoplus>.

² Capitalized terms used but not otherwise defined herein shall have the meanings given to such terms in the *Third Amended Combined Disclosure Statement and Joint Plan of Liquidation of IEH Auto Parts Holding LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 738] (the “Plan”).



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Houston, Texas
Dated: March 5, 2025

/s/ Emily Meraia

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Counsel to the Plan Agent

Certificate of Service

I certify that on March 5, 2025, 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
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In re:)	Chapter 11
)	
AUTO PLUS AUTO SALES LLC, ¹)	Case No. 23-90055 (CML)
)	
Wind-Down Debtor.)	(Formerly Jointly Administered under
)	Lead Case IEH Auto Parts Holding
)	LLC, Case No. 23-90054)
)	

**ORDER AUTHORIZING THE PLAN AGENT
TO MERGE WIND-DOWN DEBTOR'S 401(K) PLAN**

Upon the motion (the “Motion”)² of the Plan Agent seeking entry of an order (this “Order”) authorizing the Plan Agent to merge the IEH Auto Parts LLC 401(k) Plan into The Pep Boys 401(k) Plan; 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 Plan Agent’s 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

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

proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is ORDERED THAT:

1. The Plan Agent is authorized, but not directed, to merge the IEH Auto Parts LLC 401(k) Plan with and into The Pep Boys 401(k) Plan.
2. The requirements set forth in Bankruptcy Local Rule 9013-1 and Bankruptcy Local Rule 9037-1 are satisfied by the contents of the Motion.
3. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. The Plan Agent is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
6. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE