

**ENTERED**

September 16, 2025

Nathan Ochsner, Clerk

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

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|                                        |   |                                       |
|----------------------------------------|---|---------------------------------------|
| In re:                                 | ) |                                       |
|                                        | ) | Chapter 11                            |
|                                        | ) |                                       |
| AUTO PLUS AUTO SALES LLC, <sup>1</sup> | ) | Case No. 23-90055 (CML)               |
|                                        | ) | (Formerly Jointly Administered under  |
| Wind-Down Debtor.                      | ) | Lead Case IEH Auto Parts Holding LLC, |
|                                        | ) | Case No. 23-90054)                    |
|                                        | ) | <b>RE: Docket Nos. 272, 392</b>       |

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**AGREED SCHEDULING ORDER**

On October 27, 2023, MANN + HUMMEL Filtration Technologies US LLC (“M+H”) filed the *Motion for Allowance and Payment of Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code*. [23-90054 Docket No. 966]. On February 28, 2025 the Wind-Down Debtor filed the *Objection to (1) the Non-GUC Portion of Proof of Claim No. 567 filed by Mann + Hummel Filtration Technologies US LLC; and (2) Mann + Hummel Filtration Technologies US LLC’s Motion for Allowance and Payment of Administrative Expense Claim Pursuant to Section 503(b) of the Bankruptcy Code* [Docket No. 272]. On August 8, 2025, M+H filed its response. [Docket No. 392].

Pursuant to Rule 16, Federal Rules of Civil Procedure, and the agreement of the parties herein, the Court issues the following agreed scheduling order:

1. The parties may conduct mediation on these matters on or before **October 15, 2025**. Counsel may, by written agreement (email to suffice), continue mediation efforts beyond this deadline.
2. The parties shall complete written discovery on or before **December 1, 2025**. Counsel may, by written agreement (email to suffice), continue discovery beyond this deadline, but there will be no intervention by the Court, except in extraordinary circumstances.

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<sup>1</sup> 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>.



3. The parties shall complete depositions on or before **January 20, 2025**. Counsel may, by written agreement (email to suffice), conduct depositions beyond this deadline. For depositions, the party presenting a witness shall choose the location for the deposition. For party witness depositions, counsel shall accept service of deposition notices without the need for subpoenas, and without waiving any other objections to such discovery.

4. All dispositive motions shall be filed and served on all other parties on or before **March 2, 2026**. Responses shall be filed and served on all other parties not later than 21 days of the service of the motion. Any replies shall be filed and served on all parties not later than 7 days of the service of the response and shall be limited to 10 pages, but the Court need not wait for the reply before ruling on the motion.

5. The Parties shall jointly prepare and file a proposed form of pretrial statement not later than fourteen days prior to the date set for the final pretrial conference set forth herein. The proposed form of joint pretrial statement must be signed by counsel for both parties and conform substantially to the form set forth as Appendix C on the Court's website.

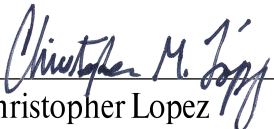
6. **Final pretrial conference is set for March 9, 2026 at 1:00 p.m. (CT) in Courtroom 401, 515 Rusk, Houston, Texas 77002.** Parties will be required to discuss at final pretrial conference any objections to the use of deposition testimony and stipulations regarding the use of experts for trial or any matters set forth herein.

7. Exhibits and a witness list are to be exchanged five (5) business days in advance of trial. In addition, counsel are encouraged to present and provide electronic versions of exhibits where practicable. Use and presentation of electronic exhibits should be coordinated through the courtroom deputy.

8. Service of pleadings and discovery may be effected by email.

9. Counsel must confer prior to the date the pretrial statement is required to be filed, to fully explore the possibility of settlement, to stipulate to matters not in dispute and to simplify the issues. The pretrial statement shall contain a certificate to that effect that the conference of counsel has been held. Counsel must also confer in an effort to determine whether the original time estimate for trial is correct or should be revised.

Signed: September 16, 2025

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

Houston, Texas  
Dated: September 5, 2025

*/s/ Zachary McKay*

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**JACKSON WALKER LLP**

Zachary McKay (TX Bar No 24073600)  
Emily Meraia (TX Bar No. 24129307)  
1401 McKinney Street, Suite 1900  
Houston, TX 77010  
Telephone: (713) 752-4200  
Facsimile: (713) 752-4221  
Email: zmkay@jw.com  
emeraia@jw.com

*Counsel to the Wind-Down Debtor*

*/s/ Kristian W. Gluck (w/permission)*

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**NORTON ROSE FULBRIGHT US LLP**

Kristian W. Gluck (SBT 24038921)  
Jason I. Blanchard (SBT 24130197)  
Michael C. Berthiaume (SBT 24129008)  
2200 Ross Avenue, Suite 3600  
Dallas, Texas 75201-7932  
Telephone: (214) 855-8000  
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michael.berthiaume@nortonrosefulbright.com

*Counsel to MANN + HUMMEL Filtration Technologies  
US LLC*

United States Bankruptcy Court  
Southern District of Texas

In re:  
Auto Plus Auto Sales LLC  
IEH Auto Parts Holding LLC  
Debtors

Case No. 23-90055-cml  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4  
Date Rcvd: Sep 16, 2025

User: ADIuser  
Form ID: pdf002

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Total Noticed: 24

The following symbols are used throughout this certificate:

| Symbol | Definition                                                                                                                                                                                                                     |
|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| +      | Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP. |

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 18, 2025:**

| Recip ID | Recipient Name and Address                                                                                                                                   |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| db       | + AP Acquisition Company New York LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                             |
| db       | + AP Acquisition Company North Carolina LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                       |
| db       | + AP Acquisition Company Washington LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                           |
| db       | + Auto Plus Auto Sales LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                                        |
| db       | + IEH AIM LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                                                     |
| db       | + IEH Auto Parts Holding LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                                      |
| db       | + IEH Auto Parts Puerto Rico, Inc., 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                                |
| db       | + IEH BA LLC, 112 Townpark Drive NW, Suite 300, Kennesaw, GA 30144-3754                                                                                      |
| cr       | Cars Training Network Inc., c/o Kevin Bell, 350 Marwood Dri, Oshawa, Ontario, Canada, L1H8B4                                                                 |
| cr       | + City of Mesquite, Grimes & Linebarger, LLP, c/o John K. Turner, 120 W Main Suite 201, Mesquite, TX 75149-4224                                              |
| cr       | Continental Battery Company, c/o Clark Hill PLC, Attn: Audrey L. Hornisher, 900 Main Street, Suite 6000, Dallas, TX 75202                                    |
| cr       | + Fidelity and Deposit Company of Maryland, c/o Clark Hill PLC, Duane J. Brescia, 3711 South Mopac Expressway, Building One, Suite 500 Austin, TX 78746-8041 |
| cr       | + Integrated Handling Inc, 13325 Enterprise Ave, Cleveland, OH 44135-5105                                                                                    |
| cr       | + MANN + HUMMEL Filtration Technologies US LLC, Attn: Len Rowe and Matt Cloninger, 1 Wix Way, Gastonia, NC 28054-6142                                        |
| cr       | + Nyler Shields, c/o Peter B. Geen, Jr., 80 Monroe Ave, Ste900, Memphis, TN 38103-2481                                                                       |

TOTAL: 15

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

| Recip ID | Notice Type: Email Address               | Date/Time            | Recipient Name and Address                                                                                                       |
|----------|------------------------------------------|----------------------|----------------------------------------------------------------------------------------------------------------------------------|
| cr       | + Email/Text: julie.parsons@mvalaw.com   | Sep 16 2025 20:16:00 | Dallam County Appraisal District, McCreary, Veselka, Bragg & Allen, P.C., P.O. Box 1269, Round Rock, TX 78680-1269               |
| cr       | + Email/Text: dallas.bankruptcy@LGBS.com | Sep 16 2025 20:17:00 | Dallas County, Linebarger Goggan Blair & Sampson, LLP, c/o John K Turner, 2777 N. Stemmons Frwy Ste 1000, Dallas, TX 75207-2328  |
| cr       | + Email/Text: collections@eucmail.com    | Sep 16 2025 20:17:00 | Easton Utilities, POB 1189, 219 N Washington St, Easton, MD 21601-3150                                                           |
| cr       | + Email/Text: msprouse@sprousepllc.com   | Sep 16 2025 20:16:00 | FRAM Group Operations LLC, c/o Sprouse Law Firm, 901 Mopac Expwy South, Bldg 1, Ste 300, Austin, TX 78746-5883                   |
| cr       | + Email/Text: dallas.bankruptcy@LGBS.com | Sep 16 2025 20:17:00 | Irving ISD, Linebarger Goggan Blair & Sampson, LLP, c/o John K. Turner, 2777 N. Stemmons Frwy Ste 1000, Dallas, TX 75207-2328    |
| op       | + Email/Text: kccnoticing@kccllc.com     | Sep 16 2025 20:16:00 | Kurtzman Carson Consultants, LLC dba Verita Global, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245-5614           |
| cr       | + Email/Text: dallas.bankruptcy@LGBS.com | Sep 16 2025 20:17:00 | Tarrant County, Linebarger Goggan Blair & Sampson, LLP, c/o John K. Turner, 2777 N Stemmons Frwy Ste 1000, Dallas, TX 75207-2328 |
| cr       | + Email/Text: julie.parsons@mvalaw.com   | Sep 16 2025 20:16:00 | The County of Dallam, Texas, McCreary, Veselka, Bragg & Allen, P.C., P.O. Box 1269, Round Rock,                                  |

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TX 78680-1269

cr + Email/Text: julie.parsons@mvbalaw.com

Sep 16 2025 20:16:00

The County of Stephens, Texas, c/o McCreary,  
Veselka, Bragg & Allen, P.O. Box 1269, Round  
Rock, TX 78680-1269

TOTAL: 9

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

| Recip ID | Bypass Reason | Name and Address                                                                     |
|----------|---------------|--------------------------------------------------------------------------------------|
| tr       |               | Michael D Warner                                                                     |
| cr       |               | BLUESCAPE ALTERA FMC, LLC                                                            |
| cr       |               | Clarit Realty, Ltd.                                                                  |
| cr       |               | Disney Road Associates, LLC                                                          |
| intp     |               | Edwin McCrary                                                                        |
| cr       |               | General Motors LLC                                                                   |
| intp     |               | Jackson Walker LLP                                                                   |
| op       |               | Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, 3rd Floor, El Segundo |
| cr       |               | RPT Hialeah I, LLC                                                                   |
| cr       |               | UNITED STATES OF AMERICA                                                             |

TOTAL: 10 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309):** Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 18, 2025

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 16, 2025 at the address(es) listed below:

| Name                    | Email Address                                                                                                                                                                                               |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Alicia Lenae Barcomb    | on behalf of U.S. Trustee US Trustee alicia.barcomb@usdoj.gov                                                                                                                                               |
| Audrey Lorene Hornisher | on behalf of Creditor Continental Battery Company audrey.hornisher@clarkhillstrasburger.com<br>mina.alvarez@clarkhillstrasburger.com                                                                        |
| Christina E. Cullom     | on behalf of Creditor UNITED STATES OF AMERICA christina.cullom@usdoj.gov<br>Caseview.ecf@usdoj.gov;USATXS.Bankruptcy-ECF@usdoj.gov;nicole.robbs@usdoj.gov;raymond.babauta@usdoj.gov;rhoma.romero@usdoj.gov |
| Christopher R. Bankler  | on behalf of Plaintiff IEH Auto Parts Holding LLC cbankler@jw.com kgradney@jw.com                                                                                                                           |
| Duane J Brescia         | on behalf of Creditor Fidelity and Deposit Company of Maryland dbrescia@clarkhill.com<br>kwebster@clarkhill.com,efarrar@clarkhill.com                                                                       |
| Edward L Ripley         | on behalf of Defendant Elliot Auto Supply Co. Inc. eripley@andrewsmyers.com, sray@andrewsmyers.com                                                                                                          |

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|                      |                                                                                                                                                                                   |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Edward Todd Sable    | on behalf of Creditor General Motors LLC tsable@honigman.com                                                                                                                      |
| Emily Meraia         | on behalf of Debtor IEH BA LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com                                                                           |
| Emily Meraia         | on behalf of Debtor IEH AIM LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com                                                                          |
| Emily Meraia         | on behalf of Debtor IEH Auto Parts Holding LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com                                                           |
| Emily Meraia         | on behalf of Debtor IEH Auto Parts Puerto Rico Inc. emeraia@jw.com, kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com                                                     |
| Emily Meraia         | on behalf of Debtor Auto Plus Auto Sales LLC emeraia@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com;steso@jw.com                                                             |
| Evan Gershbein       | on behalf of Other Prof. Kurtzman Carson Consultants LLC ECFpleadings@kccllc.com ECFpleadings@kccllc.com                                                                          |
| Evan Gershbein       | on behalf of Other Prof. Kurtzman Carson Consultants LLC dba Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com                                                       |
| JaKayla DaBera       | on behalf of Trustee Michael D Warner jdabera@krcl.com jdabera@ecf.courtdrive.com;ecf@krcl.com                                                                                    |
| Jason Lee Boland     | on behalf of Interested Party Jackson Walker LLP jason.boland@nortonrosefulbright.com                                                                                             |
| Jayson B. Ruff       | on behalf of U.S. Trustee US Trustee jayson.b.ruff@usdoj.gov                                                                                                                      |
| Jennifer A Gehrt     | on behalf of Creditor RPT Hialeah I LLC jgehrt@bglaw.net                                                                                                                          |
| Jim D. Aycock        | on behalf of Defendant Elliot Auto Supply Co. Inc. jaycock@andrewsmyers.com, plee@andrewsmyers.com                                                                                |
| John Kendrick Turner | on behalf of Creditor Dallas County john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com                                                               |
| John Kendrick Turner | on behalf of Creditor City of Mesquite john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com                                                            |
| John Kendrick Turner | on behalf of Creditor Tarrant County john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com                                                              |
| John Kendrick Turner | on behalf of Creditor Irving ISD john.turner@lgbs.com Dora.Casiano-Perez@lgbs.com;John.Turner@ecf.courtdrive.com                                                                  |
| Julie Anne Parsons   | on behalf of Creditor The County of Stephens Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com                           |
| Julie Anne Parsons   | on behalf of Creditor Dallam County Appraisal District jparsons@mvbalaw.com vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com                        |
| Julie Anne Parsons   | on behalf of Creditor The County of Dallam Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com                             |
| Kim Ellen Lewinski   | on behalf of Interested Party Edwin McCrary klewinski@dykema.com mdurrschmidt@dykema.com;scallier@dykema.com                                                                      |
| Kyle Woodard         | on behalf of Trustee Michael D Warner kwoodard@krcl.com kwoodard@ecf.courtdrive.com;ecf@krcl.com;srhea@krcl.com                                                                   |
| Lawrence A. Lichtman | on behalf of Creditor General Motors LLC llichtman@honigman.com jwright-smoot@honigman.com                                                                                        |
| Lisa Ann Powell      | on behalf of Creditor Disney Road Associates LLC Lisa.Powell@fisherbroyles.com                                                                                                    |
| Lisa Luz Parker      | on behalf of Creditor UNITED STATES OF AMERICA lisa.luz.parker@usdoj.gov nicole.robbs@usdoj.gov;isabell.hinojosa@usdoj.gov;USATXS.Bankruptcy-ECF@usdoj.gov;caseview.ecf@usdoj.gov |

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|                            |                                                                                                                                                    |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| Maha Ghyas                 | on behalf of Debtor Auto Plus Auto Sales LLC mghyas@jw.com                                                                                         |
| Marvin E Sprouse, III      | on behalf of Creditor FRAM Group Operations LLC msprouse@sprousepllc.com sprouselawfirm@gmail.com                                                  |
| Michael Berthiaume         | on behalf of Creditor MANN + HUMMEL Filtration Technologies US LLC michael.berthiaume@nortonrosefulbright.com                                      |
| Michelle E Shriro          | on behalf of Creditor Clarit Realty Ltd. mshriro@singerlevick.com, scotton@singerlevick.com;tguillory@singerlevick.com                             |
| Millie Aponte Sall         | on behalf of U.S. Trustee US Trustee millie.sall@usdoj.gov                                                                                         |
| Susan Tran Adams           | on behalf of Debtor IEH Auto Parts Holding LLC stran@ts-llp.com corraltransinghllp@jubileebk.net                                                   |
| Susan Tran Adams           | on behalf of Debtor Auto Plus Auto Sales LLC stran@ts-llp.com corraltransinghllp@jubileebk.net                                                     |
| US Trustee                 | USTPRegion07.HU.ECF@USDOJ.GOV                                                                                                                      |
| Veronica Ann Polnick       | on behalf of Debtor Auto Plus Auto Sales LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com                  |
| Veronica Ann Polnick       | on behalf of Debtor IEH Auto Parts Puerto Rico Inc. vpolnick@nvfirm.com,<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com          |
| Veronica Ann Polnick       | on behalf of Debtor IEH BA LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com                                |
| Veronica Ann Polnick       | on behalf of Debtor AP Acquisition Company Washington LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com     |
| Veronica Ann Polnick       | on behalf of Debtor AP Acquisition Company North Carolina LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com |
| Veronica Ann Polnick       | on behalf of Debtor IEH Auto Parts Holding LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com                |
| Veronica Ann Polnick       | on behalf of Debtor IEH AIM LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com                               |
| Veronica Ann Polnick       | on behalf of Debtor AP Acquisition Company New York LLC vpolnick@nvfirm.com<br>kgradney@jw.com;dtrevino@jw.com;ecftx@nvfirm.com;jpupo@jw.com       |
| Vianey Garza               | on behalf of U.S. Trustee US Trustee vianey.garza@usdoj.gov                                                                                        |
| Victoria Nicole Argeroplos | on behalf of Debtor Auto Plus Auto Sales LLC vargeroplos@jw.com<br>msalinas@jw.com;kgradney@jw.com;jpupo@jw.com;dtrevino@jw.com                    |
| Zachary S McKay            | on behalf of Debtor IEH Auto Parts Holding LLC zmckay@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com                                          |
| Zachary S McKay            | on behalf of Debtor Auto Plus Auto Sales LLC zmckay@jw.com kgradney@jw.com;dtrevino@jw.com;jpupo@jw.com                                            |

TOTAL: 51