

EXHIBIT

2

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

In re:

IEH AUTO PARTS HOLDING LLC, *et al.*,

Debtors.

Chapter 11

Case No. 23-90054 (CML)

(Jointly Administered)

RESPONSES TO UNITED STATES TRUSTEE'S
FIRST SET OF INTERROGATORIES TO
THE LAW OFFICE OF LIZ FREEMAN, PLLC, AND ELIZABETH CAROL FREEMAN

Elizabeth Carol Freeman and the Law Office of Liz Freeman, PLLC (collectively "Freeman") respond to the First Set of Interrogatories of Kevin M. Epstein, United States Trustee for Region 7 (the "UST").

Date: April 9th, 2024

Respectfully Submitted,



Tom Kirkendall
Texas State Bar No. 11517300
LAW OFFICE OF TOM KIRKENDALL
2 Violetta Ct
The Woodlands, TX 77381
713.703.3536 (mobile & text)
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COUNSEL FOR ELIZABETH CAROL FREEMAN



Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument was served on respective counsel for the other parties to this civil action via electronic transmission the 9th day of April, 2024.

A handwritten signature in black ink, appearing to read "Tom Kirkendall", written in a cursive style.

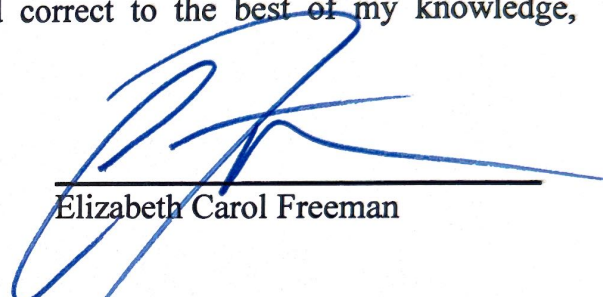
Tom Kirkendall

THE STATE OF TEXAS §
 §
COUNTY OF HARRIS §

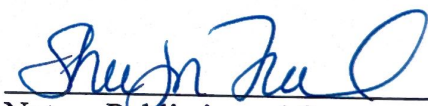
VERIFICATION

BEFORE ME, the undersigned notary, on this day personally appeared, Elizabeth Carol Freeman, the affiant, a person whose identity is known to me. After I administered an oath, affiant testified as follows:

“My name is Elizabeth Carol Freeman. I am the president of Law Office of Liz Freeman, PLLC and sign this verification in that capacity and my individual capacity. I have read the Answers to the UST’s Interrogatories. The answers are true and correct to the best of my knowledge, information, and belief.”


Elizabeth Carol Freeman

 SWORN TO and SUBSCRIBED before me by Elizabeth Carol Freeman on April
_____, 2024.


Notary Public in and for
the State of Texas



Responses to Interrogatories

Interrogatory Number 1: If your response to Request to Admit Number 10 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 2: If your response to Request to Admit Number 11 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 3: If your response to Request to Admit Number 12 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Judge Jones purchased the residence using exclusively his funds in 2017. Freeman is the executor of Judge Jones's will and a beneficiary under his will. As a part of his estate planning, Judge Jones conveyed to Freeman a joint tenancy with right of survivorship in the residence in 2017.

Interrogatory Number 4: If your response to Request to Admit Number 13 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 5: If your response to Request to Admit Number 14 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Freeman does not know when her relationship with Judge Jones first became public.

Interrogatory Number 6: If your response to Request to Admit Number 15 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 7: If your response to Request to Admit Number 16 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Freeman does not have personal knowledge of Judge Jones' disclosures to the Bankruptcy Court.

Interrogatory Number 8: If your response to Request to Admit Number 17 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 9: If your response to Request to Admit Number 18 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Freeman does not have personal knowledge of what Judge Jones disclosed to the other parties to the Mediation.

Interrogatory Number 10: If your response to Request to Admit Number 21 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 11: If your response to Request to Admit Number 22 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 12: If your response to Request to Admit Number 23 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 13: If your response to Request to Admit Number 24 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 14: If your response to Request to Admit Number 25 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Freeman does not know whether or not Jackson & Walker took any steps to prevent Judge Jones from acting as the mediator

Interrogatory Number 15: If your response to Request to Admit Number 28 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 16: If your response to Request to Admit Number 29 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 17: If your response to Request to Admit Number 30 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 18: If your response to Request to Admit Number 31 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Freeman participated on a limited basis in the IEH Auto Parts mediation. She was not involved in the parties' selection of Judge Jones as the mediator. Freeman does not know if the disclosure of her romantic relationship with Judge Jones would have excluded her from participating in the mediation or in cases over which Judge Jones presided.

Interrogatory Number 19: If your response to Request to Admit Number 32 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Objection to the extent that the answer seeks privileged attorney-client communications. Subject to that objection, Mr. Kirkendall recommended to Jackson & Walker that the firm disclose the relationship in cases in which Judge Jones was the judge and Jackson & Walker was representing a party-in-interest.

Interrogatory Number 20: If your response to Request to Admit Number 34 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 21: If your response to Request to Admit Number 35 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: No response required.

Interrogatory Number 22: If your response to Request to Admit Number 36 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Freeman did not conduct such searches in cases in which she was responsible for conducting searches. Freeman does not know if Jackson & Walker conducted such searches in other cases.

Interrogatory Number 23: If your response to Request to Admit Number 37 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Objection on the grounds of relevance. Rule 2014 sets forth the requirements for disclosing connections. Moreover, Kirkland & Ellis is not involved in this case or contested matter. Finally, obtaining information necessary to answer the interrogatory would require discovery that is not proportional to the needs of the contested matter considering that the burden and expense of such discovery outweighs its likely benefit. Subject to the foregoing objections, Freeman does not have personal knowledge of what Kirkland & Ellis did or did not do.

Interrogatory Number 24 If your response to Request to Admit Number 38 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Objection on the grounds of relevance. Rule 2014 sets forth the requirements for disclosing connections. Moreover, Kirkland & Ellis is not involved in this case or contested matter. Finally, obtaining information necessary to answer the interrogatory would require discovery that is not proportional to the needs of the contested matter considering that the burden and expense of such discovery outweighs its likely benefit. Subject to the foregoing objections, Freeman does not have personal knowledge of what Kirkland & Ellis did or did not do.

Interrogatory Number 25: If your response to Request to Admit Number 39 is anything other than an unqualified admission, state all facts that support your failure to admit that Request in its entirety.

Answer: Objection on the grounds of relevance. Rule 2014 sets forth the requirements for disclosing connections. Moreover, Kirkland & Ellis is not involved in this case or contested matter. Finally, obtaining information necessary to answer the interrogatory would require discovery that is not proportional to the needs of the contested matter considering that the burden and expense of such discovery outweighs its likely benefit. Subject to the foregoing objections, Freeman does not have personal knowledge of what Kirkland & Ellis did or did not do.

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

In re:

IEH AUTO PARTS HOLDING LLC, *et al.*,

Debtors.

Chapter 11

Case No. 23-90054 (CML)

(Jointly Administered)

**ELIZABETH C. FREEMAN'S RESPONSES TO
UNITED STATES TRUSTEE'S FIRST REQUEST FOR ADMISSIONS**

Elizabeth C. Freeman ("Freeman") provides the following responses to the request for admissions of Kevin M. Epstein, United States Trustee for Region 7 (the "UST").

Date: April 9th, 2024

Respectfully Submitted,



Tom Kirkendall
Texas State Bar No. 11517300
LAW OFFICE OF TOM KIRKENDALL
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The Woodlands, TX 77381
713.703.3536 (mobile & text)
bigtkirk@gmail.com

COUNSEL FOR ELIZABETH CAROL FREEMAN

CERTIFICATE OF SERVICE

The foregoing responses to request for admission were transmitted via electronic transmission on April 9th, 2024 to counsel for the United States Trustee.

A handwritten signature in black ink, appearing to read "Tom Kirkendall", written in a cursive style.

Tom Kirkendall

Responses to Requests for Admission

Request Number 1: Admit that on March 2, 2023, the Debtors filed the Employment Application [ECF No. 183].

Answer: Admitted.

Request Number 2: Admit that in the Employment Application, the Debtors sought to employ you as their bankruptcy co-counsel and as conflicts counsel to represent the Debtors along with the Debtors' lead bankruptcy counsel, Jackson Walker [ECF No. 183].

Answer: Admitted.

Request Number 3: Admit that in the Employment Application, the Debtors stated that you were to "provide legal advice and services on any matter on which" Jackson Walker "may have a conflict or as needed based on specialization" [ECF No. 183].

Answer: Admitted.

Request Number 4: Admit that in your declaration filed in support of the Employment Application, you stated the following:

Based on the conflicts search I conducted, to the best of my knowledge, neither I, nor [The Law Firm of Liz Freeman, PLLC] have any connections with the Debtors, their creditors, or other parties in interest, their respective attorneys and accountants other than what is disclosed in this Declaration.
[ECF No. 183].

Answer: Admitted.

Request Number 5: Admit that in your declaration filed in support of the Employment Application, you stated that you would “periodically review both the changes in identifiable parties in interest of the Debtors and clients of [The Law Firm of Liz Freeman, PLLC] as such information becomes available or relevant and will update this disclosure as appropriate” [ECF No. 183].

Answer: Admitted.

Request Number 6: Admit that on April 3, 2023, the court approved the Employment Application and the Debtors’ employment of you as co-counsel and conflicts counsel [ECF No. 320].

Answer: Admitted.

Request Number 7: Admit that the court’s order approving the Employment Application required you to review the files of The Law Firm of Liz Freeman, PLLC “periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise” [ECF No. 320].

Answer: Admitted.

Request Number 8: Admit that the court’s order approving the Employment Application states that if “any new relevant facts or relationships are discovered or arise, the [The Law Office of Liz Freeman, PLCC] will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Fed. R. Bankr. P. 2014(a)” [ECF No. 320].

Answer: Admitted.

Request Number 9: Admit that on April 6, 2023, the Debtors, the Official Committee of Unsecured Creditors, and the DIP Lender, American Entertainment Properties Corp., filed a Stipulation and Agreed Order agreeing to mediate before Judge Jones [ECF 347].

Answer: Admitted.

Request Number 10: Admit that as of April 6, 2023, you were in a romantic relationship with Judge Jones.

Answer: Admitted.

Request Number 11: Admit that your romantic relationship with Judge Jones began sometime before 2017.

Answer: Admitted.

Request Number 12: Admit that you and Judge Jones had jointly owned a residence since 2017.

Answer: Admitted that, as a part of his probate estate planning, Judge Jones conveyed to Freeman a joint tenancy with right of survivorship interest in the home that he purchased exclusively with his funds in 2017.

Request Number 13: Admit that you and Judge Jones were living together in March and April 2023.

Answer: Admitted.

Request Number 14: Admit that your romantic relationship with Judge Jones first became public in October 2023, when he admitted the relationship to *The Wall Street Journal*.

Answer: Can neither admit nor deny.

Request Number 15: Admit that you did not disclose your romantic relationship with Judge Jones to the Bankruptcy Court.

Answer: Admitted.

Request Number 16: Admit that Judge Jones did not disclose the romantic relationship between himself and you to the Bankruptcy Court.

Answer: Can neither admit nor deny.

Request Number 17: Admit that you did not disclose at any time your romantic relationship with Judge Jones to the other parties to the Mediation.

Answer: Admitted.

Request Number 18: Admit that Judge Jones did not disclose the romantic relationship between himself and you to the other parties to the Mediation at any time before, during, or after the Mediation.

Answer: Can neither admit nor deny.

Request Number 19: Admit that on April 10, 2023, the Bankruptcy Court entered an order appointing Judge Jones as the mediator in the Debtors' Bankruptcy Cases.

Answer: Admitted.

Request Number 20: Admit that Judge Jones conducted the Mediation on April 19-20, 2023.

Answer: Admitted.

Request Number 21: Admit that you billed the Debtors for services and expenses in connection with the Mediation, including appearances at the Mediation that Judge Jones conducted.

Answer: Admitted.

Request Number 22: Admit that you never amended your disclosures, either before or after you personally participated in the Mediation.

Answer: Admitted.

Request Number 23: Admit that you never filed a supplemental declaration to disclose your connections to Judge Jones at any time after he was proposed or appointed as mediator in the Debtors' Bankruptcy Cases.

Answer: Admitted.

Request Number 24: Admit that you did not take any action to prevent Judge Jones from acting as a mediator in the Debtors' Bankruptcy Cases.

Answer: Admitted.

Request Number 25: Admit that Jackson Walker did not take any action to prevent Judge Jones from acting as a mediator in the Debtors' Bankruptcy Cases.

Answer: Can neither admit nor deny.

Request Number 26: Admit that you never sought to withdraw as co-counsel or conflicts counsel for the Debtors until February 7, 2024 [ECF No. 1057].

Answer: Admitted.

Request Number 27: Admit that you have been board certified in business bankruptcy law by the Texas Board of Legal Specialization since 2005.

Answer: Admitted.

Request Number 28: Admit that in the spring of 2023, you understood your disclosure obligations under Rule 2014 of the Federal Rules of Bankruptcy Procedure.

Answer: Admitted.

Request Number 29: Admit that in the spring of 2023, you understood your disclosure obligations under Local Rule 16.4(I) of the Bankruptcy Court.

Answer: Admitted. The rule applies to a mediator's disclosure obligations.

Request Number 30: Admit that in the spring of 2023, you understood your ethical obligations as an officer of the court.

Answer: Admitted.

Request Number 31: Admit that in the spring of 2023, you knew that if you disclosed your connections to Judge Jones, you would be disqualified from working on cases over which he presided or that he mediated.

Answer: Denied.

Request Number 32: Admit that in the spring of 2022, your attorney, Tom Kirkendall, advised you to disclose your relationship with Judge Jones in new cases going forward.

Answer: Objection to the extent that the answer seeks privileged attorney-client communications. Subject to that objection, Freeman admits that Mr. Kirkendall recommended to Jackson & Walker that Jackson & Walker disclose the relationship in cases in which Judge Jones was the judge and Jackson & Walker was representing a party-in-interest.

Request Number 33: Admit that from January 2021 through December 2022, you had been an equity partner at Jackson Walker.

Answer: Admitted.

Request Number 34: Admit that you resigned your partnership in Jackson Walker in December 2022.

Answer: Admitted.

Request Number 35: Admit that you resigned your partnership in Jackson Walker after Jackson Walker confirmed that you were in a relationship with Judge Jones.

Answer: Admitted.

Request Number 36: Admit that during the time you were at Jackson Walker, Jackson Walker sometimes searched for connections to judges as part of conflicts checks and then attested “N/A” that there were no such connections.

Answer: Can neither admit nor deny.

Request Number 37: Admit that in bankruptcy cases filed in the Bankruptcy Court in which Jackson Walker was co-counsel or conflicts counsel, Kirkland & Ellis included bankruptcy judges in the Bankruptcy Court on schedules of material parties reviewed as part of the firm’s conflicts checks.

Answer: Objection on the grounds of relevance. Rule 2014 sets forth the requirements for disclosing connections. Moreover, Kirkland & Ellis is not involved in this case or contested matter. Finally, obtaining information necessary to admit or deny the statement would require discovery that is not proportional to the needs of the contested matter considering that the burden and expense of such discovery outweighs its likely benefit. Subject to the foregoing objections, Freeman can neither admit nor deny.

Request Number 38: Admit that in bankruptcy cases filed in the Bankruptcy Court in which Jackson Walker was co-counsel or conflicts counsel, Kirkland & Ellis disclosed connections to judges and courthouse staff as part of its employment applications.

Answer: Objection on the grounds of relevance. Rule 2014 sets forth the requirements for disclosing connections. Moreover, Kirkland & Ellis is not involved in this case or contested matter. Finally, obtaining information necessary to admit or deny the statement would require discovery that is not proportional to the needs of the contested matter considering that the burden and expense of such discovery outweighs its likely benefit. Subject to the foregoing objections, Freeman can neither admit nor deny.

Request Number 39: Admit that in bankruptcy cases filed in the Bankruptcy Court in which Jackson Walker was co-counsel or conflicts counsel, Kirkland & Ellis disclosed connections to judges and courthouse staff in its Rule 2014 disclosures accompanying employment applications.

Answer: Objection on the grounds of relevance. Rule 2014 sets forth the requirements for disclosing connections. Moreover, Kirkland & Ellis is not involved in this case or contested matter. Finally, obtaining information necessary to admit or deny the statement would require discovery that is not proportional to the needs of the contested matter considering that the burden and expense of such discovery outweighs its likely benefit. Subject to the foregoing objections, Freeman can neither admit nor deny.