Docket #0720 Date Filed: 06/15/2023

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.*,[1]	)	Case No. 23-90054 (CML)
Debtors.	)	(Jointly Administered)

AMENDED NOTICE OF PROPOSED MISCELLANEOUS ASSET SALE

On June 7, 2023, the United States Bankruptcy Court for the Southern District of Texas (the "Court") entered that certain *Corrected Order Establishing Procedures for Sales of Certain Miscellaneous Assets Outside the Ordinary Course of Business Free and Clear of All Liens, Claims, Interests and Encumbrances* [Docket No. 670] the ("Miscellaneous Asset Sale Procedures Order"),[2] whereby the Court authorized the above- captioned debtors and debtors in possession (collectively, the "Debtors") to sell certain Miscellaneous Assets in accordance with procedures provided for therein.

Pursuant to the terms of the Miscellaneous Asset Sale Procedures Order, the Debtors propose to sell (the "Proposed Miscellaneous Asset Sale") the Miscellaneous Assets as set forth on **Exhibit A** attached hereto. In accordance with the Miscellaneous Asset Sale Procedures Order, **Exhibit A** attached hereto provides: (i) a description of the Miscellaneous Assets that are the subject of the Proposed Miscellaneous Asset Sale; (ii) the location of the Miscellaneous Assets; (iii) the economic terms of sale; (iv) the identity of any non-Debtor party to the Proposed Miscellaneous Asset Sale and specify whether that party is an "affiliate" or "insider" as those terms are defined under section 101 of the Bankruptcy Code; (v) the identity of the party, if any, holding liens, claims, encumbrances or other interests in the Miscellaneous Assets; and (vi) a list of assumed executory contracts and unexpired leases, if applicable.

Pursuant to the Miscellaneous Asset Sale Procedures Order, parties shall have until **June 21, 2023** (the "Objection Deadline") to advise the undersigned counsel to the Debtors in writing with specific and particular bases that they object to the Proposed Miscellaneous Asset Sale by emailing SaleJw-AutoPlus@jw.com or filing on the Court's docket within the time specified in the Miscellaneous Asset Sale Procedures. Any cure amount objection filed in connection with an

[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 defined herein shall have the meanings ascribed to such terms in the Miscellaneous Asset Sale Procedures Order.

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unexpired lease or executory contract listed on **Exhibit A** that is pending as of the date of this Notice shall serve as a timely received written objection to this Notice.

IF NO WRITTEN OBJECTION IS RECEIVED BY THE OBJECTION DEADLINE, THE ABSENCE OF A TIMELY OBJECTION TO THE PROPOSED MISCELLANEOUS ASSET SALE SHALL BE "CONSENT" TO SUCH SALE WITHIN THE MEANING OF SECTION 363(f)(2) OF THE BANKRUPTCY CODE, AND THE DEBTORS MAY CONSUMMATE THE PROPOSED MISCELLANEOUS ASSET SALE.

If a written objection to the Proposed Miscellaneous Asset Sale is timely received by the Objection Deadline, the Debtors will not proceed with the Proposed Miscellaneous Asset Sale unless: (i) the objection is withdrawn or otherwise resolved; or (ii) the Court approves the Proposed Miscellaneous Asset Sale; *provided* that if the Debtors receive a timely written objection to the assumption and assignment of any executory contract or unexpired lease, including (x) adequate assurance of future performance or (y) the proposed assumption and assignment of any executory contract or unexpired lease, the Debtors may proceed with the Proposed Miscellaneous Asset Sale and the executory contracts and unexpired leases may be conditionally assumed and assigned to the purchaser, subject to the consent of the purchaser, pending a resolution of the objection by agreement of the parties or after notice and a hearing. If an objection is not satisfactorily resolved, the purchaser may determine that such executory contracts and unexpired leases should not be assumed and assigned and should be rejected and not assigned, in which case the purchaser will not be responsible for any cure amounts to the contract counterparty. The Debtors may then seek to reject the applicable contract or lease pursuant to section 365 of the Bankruptcy Code.

Houston, Texas
Dated: June 15, 2023

/s/ *Genevieve M. Graham*

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Counsel to the Debtors
and Debtors in Possession

Exhibit A to Miscellaneous Asset Sale Notice

I. Description and II. Location of the Miscellaneous Assets

ID#	Type	Abbrev Address	State	Full Address
10058	Locations	10058	PA	6601 Kelly St. Pittsburgh, PA 15206

III. Economic terms of sale

Purchase Price: $58,078

IV. Identity of non-Debtor party to the Proposed Miscellaneous Asset Sale

Entity Name: Elliott Auto Supply Co., Inc. (not an "affiliate" or "insider" as those terms are defined under section 101 of the Bankruptcy Code)

V. Identity of the party holding liens, claims, encumbrances or other interests in the Miscellaneous Assets

Entity Name: American Entertainment Properties Corp.

VI. A list of assumed executory contracts and unexpired leases

LOT	ID	Profit Center Name	State	Landlord Name	Landlord Address	Debtor Tenant	Premises Address
Marietta	**10058**	10058	PA	Icon Management I LLC	5877 Commerce Street, Suite 109 Pittsburgh, PA 15206-3835	IEH Auto Parts LLC	6601 Kelly St. Pittsburgh, PA 15206