

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.*, § CASE NO. 23-90054
§
Debtors. § (Jointly Administered)

**CREDITOR PROPERTY WORKS’ LIMITED OBJECTION TO SECOND AMENDED
COMBINED DISCLOSURE STATEMENT AND JOINT PLAN OF LIQUIDATION**

Creditor, Property Works (“Property Works”), objects to the Second 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 filed on June 9, 2023 (the “Plan”) [Doc. No. 687, 688] and, in support of this objection (the “Objection”), Property Works shows as follows:

1. Property Works’ claim relates to that certain Systems and Services Agreement between IEH Auto Parts Holding LLC, et al. (the “Debtors”) and Property Works dated February 1, 2004 (the “Agreement”).

2. Property Works filed Proofs of Claim [Claim Nos. 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 564, and 566] which are incorporated herein by reference for all purposes.

3. The Debtors previously obtained an Order Approving the Bid Procedures and Granting Related Relief [Doc. No. 208], approving the assumption and assignment of certain executory contracts to the winning bidder. The Debtors filed the First Supplement Cure Notice (the “Cure Notice”) [Doc. No. 475 at page 24] indicating the Debtors’ intent to assign the Agreement with Property Works to the winning bidder. However, the Cure Notice listed the Cure Amount to Property Works as \$0.

4. Property Works asserts the appropriate amount for the Cure Amount is \$30,825.80, with an additional \$6,940.00 having come due on May 31, 2023. Property Works timely filed an



Objection to Cure Amount on May 16, 2023 [Doc. No. 538], which is incorporated herein in its entirety by reference.

5. Property Works now files this limited Objection to preserve its right to seek payment of the amounts owing as reflected in the filed Proofs of Claim and as outlined in the Objection to Cure Amount.

WHEREFORE, Property Works requests that this Objection be sustained, the Plan be denied confirmation, and for such other and further relief as deemed just and proper.

Dated: June 16, 2023.

Respectfully submitted,

/s/ Justin W. R. Renshaw
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing to all counsel and parties of record via CM/ECF on this 16th day of June, 2023.

/s/ Justin W. R. Renshaw
Justin W. R. Renshaw