

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

IN RE	§	Chapter 11
	§	
IEH Auto Parts Holdings, LLC., <i>et al.</i> , <sup>1</sup>	§	Case No. 23-90054 (CML)
	§	
Debtors.	§	(Jointly Administered)
	§	
	§	

LIMITED OBJECTION TO THE FIRST 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

Continental Battery Company (“**Continental**”), files this *Limited Objection to the First 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* (the “**Limited Objection**”). Continental files this Limited Objection for the sole purpose of opting out of the releases contained in the *First 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* [ECF No. 465] (the “**Plan**”) and elects to not grant the releases contained in the Plan.

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<sup>1</sup> The Debtor entities in these chapter 11 cases are: IEH Auto Parts Holding LLC; AP Acquisition Company Clark LLC; AP Acquisition Company Gordon LLC; AP Acquisition Company Massachusetts LLC; AP Acquisition Company Missouri LLC; AP Acquisition Company New York LLC; AP Acquisition Company North Carolina LLC; AP Acquisition Company Washington LLC; Auto Plus Auto Sales LLC; IEH AIM LLC; IEH Auto Parts LLC; IEH Auto Parts Puerto Rico, Inc.; and IEH BA LLC.



Dated: May 25, 2023

Respectfully submitted,

/s/ Audrey L. Hornisher

Robert P. Franke (TX Bar No. 07371200)

Audrey L. Hornisher (TX Bar No. 24094369)

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**ATTORNEYS FOR CONTINENTAL  
BATTERY COMPANY**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 25, 2023, a true and correct copy of the foregoing document was served upon all parties who have consented to service via this Court's CM/ECF System.

/s/ Audrey L. Hornisher

Audrey L. Hornisher