

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
§
Debtors. § (Jointly Administered)

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

Creditor, Property Works ("Property Works"), objects 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 filed on May 2, 2023 (the "Plan") [Doc. No. 465] 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

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.



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 coming due on May 31, 2023, for a total of **\$37,765.80** to be due as of May 31, 2023. Property Works timely filed an Objection to Cure Amount on May 16, 2023 [Doc. No. 538], which is incorporated herein by reference in its entirety for all purposes.

5. Property Works now files this limited Objection, in part, 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 and this Objection.

6. Property Works also files this limited Objection for the purpose of opting out of the releases contained in the Plan. Property Works elects not to grant the releases contained in the Plan.

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

Dated: May 26, 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 26th day of May, 2023.

/s/ Justin W. R. Renshaw