

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

In re:)	
)	Chapter 11
)	
AUTO PLUS AUTO SALES LLC,)	Case No. 23-90055 (CML)
)	
Wind-Down Debtor. ¹)	(Formerly Jointly Administered
)	under Lead Case IEH Auto Parts
)	Holding LLC, Case No. 23-90054)

**GUC TRUSTEE'S SIXTH OMNIBUS OBJECTION TO CLAIMS
(Scheduled CDU Claims: Claimants H-R)**

This is an objection to your claim. This objection asks the Court to disallow the claim that you filed in this bankruptcy case. If you do not file a response within 30 days after the date this objection was served, your claim may be disallowed without a hearing.

A hearing has been set on this matter on April 16, 2024, at 10:00 a.m. (prevailing Central Time) in Courtroom 401, 4th floor, 515 Rusk Street, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez's conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's home page. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic

¹ On January 16, 2024, the Court entered a *Final Decree Closing Certain of the Chapter 11 Cases* [Case No. 23-90054, Dkt. No. 1043] closing each Debtor's chapter 11 case except the case of Auto Plus Auto Sales LLC. The following is a complete list of the Debtor entities in these chapter 11 cases, along with the last four digits of each entity's federal tax identification number: 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 Wind-Down Debtors' service address is: 5330 Caramel Crest Lane, Charlotte, NC 28226.



Appearance" link on Judge Lopez's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

This Objection seeks to disallow certain proofs of claim. Claimants receiving this Objection should locate their names and claims on Schedule 1 to the Proposed Order attached to this Objection.

Michael D. Warner, solely in his capacity as trustee (the "GUC Trustee") of the Auto Parts GUC Trust (the "GUC Trust"), files this *Omnibus Objection to Claims* (this "Objection"). In support of this Objection, the GUC Trustee submits the attached *Declaration of Kyle Woodard* (the "Declaration") and respectfully states as follows:

Relief Requested

1. The GUC Trustee respectfully requests entry of an order, substantially in the form attached hereto (the "Proposed Order"), disallowing and expunging each scheduled claim identified on Schedule 1 to the Proposed Order (collectively, the "Scheduled CDU Claims"), because each claim is listed on the Debtors' Bankruptcy Schedules as either contingent, disputed, and/or unliquidated. For the avoidance of doubt, this Objection does not affect any proofs of claim filed by the claimants identified on Schedule 1; however, any such proofs of claim remain subject in all respects to any other or further objections of the GUC Trustee.

2. In accordance with Bankruptcy Rule 3007(e)(6), this Objection is limited to Scheduled CDU Claims of claimants with names beginning with the letters "H" through "R."

Jurisdiction and Venue

3. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The GUC Trustee consents to the Court's entry of a final order on this matter.

4. Venue before this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are sections 105 and 502 of title 11 of the United States Code (the "Bankruptcy Code"), rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rules 3007-1 and 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Local Rules").

General Background

6. On January 31, 2023 (the "Petition Date"), IEH Auto Parts Holding LLC and its debtor affiliates (collectively, the "Debtors") each filed voluntary petitions for relief in this Court under Chapter 11 of the Bankruptcy Code.

7. On February 1, 2023, the Court entered an Order [Case No. 23-90054, Dkt. No. 28] authorizing the employment and retention of Kurtzman Carson Consultants LLC as the claims, noticing, and solicitation agent in these bankruptcy cases (the "Claims Agent").

8. On March 13, 2023, the Court entered its *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment under Section 503(b)(9), (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests, and (IV) Approving Notice of Bar Dates* [Case No. 23-90054, Dkt. No. 222] (the "Bar Date Order"), establishing the following deadlines: (i) May 1, 2023, as the deadline for filing proofs of claim (the "General Bar Date"); and (ii) July 31, 2023, as the deadline for claims asserted by governmental units (the "Government Bar Date" and together with the General Bar Date, the "Bar Dates").

9. The Claims Agent mailed written notice of the Bar Dates to, among others, (i) all creditors and other known holders of claims against the Debtors, (ii) all parties requesting notice in these bankruptcy cases, and (iii) all entities that had filed a proof of claim in these bankruptcy cases as of the date of the Bar Date Order. *See Certificates of Service* filed at Case No. 23-90054,

Dkt. Nos. 257, 284, and 384. Additionally, the Claims Agent published written notice of the Bar Dates in *The New York Times* – National Edition on March 17, 2023. *See Affidavit of Publication* [Case No. 23-90054, Dkt. No. 251].

10. On March 31, 2023, each of the Debtors filed its respective Schedule of Assets and Liabilities [Case No. 23-90054, Dkt. Nos. 292–304] (as each may have been, or may be, amended from time to time, the "Bankruptcy Schedules").²

11. On June 16, 2023, the Court entered its *Order Confirming the Third 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* [Case No. 23-90054, Dkt. No. 749] (the "Confirmation Order"), thereby, among other things: (i) confirming the Debtors' *Third 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* [Case No. 23-90054, Dkt. No. 738] (the "Plan");³ (ii) approving the form of *GUC Trust Agreement* attached to the Plan Supplement [Case No. 23-90054, Dkt. No. 689, Ex. D]; and (iii) approving the GUC Trustee's appointment in accordance with the Plan.

12. The Plan became effective on October 6, 2023 (the "Effective Date"). *See Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Related Bar Dates* [Case No. 23-90054, Dkt. No. 922]. The GUC Trust was created and settled as of the Effective Date, pursuant to the Plan and the *GUC Trust Agreement* dated October 6, 2023, executed by and among the Debtors and the GUC Trustee [Case No. 23-90054, Dkt. No. 923-1] (the "GUC Trust Agreement").

² Debtor IEH Auto Parts Holding, LLC filed an Amended Bankruptcy Schedule A/B on May 18, 2023 [Case No. 23-90054, Dkt. No. 563]. The GUC Trustee is not aware of any other amendments to the Debtors' Bankruptcy Schedules.

³ Capitalized terms not defined in this Objection shall have the meanings provided in the Plan unless otherwise noted.

13. The Plan provides for the substantive consolidation of the Debtors for purposes of reconciling claims and making distributions to claimants. *See Plan*, p. 2 ("each Claim filed against one Debtor shall be deemed filed against the consolidated Debtors for the purposes of this Plan, and shall be deemed a single Claim against the consolidated Debtors' Estates for Plan purposes.").

14. On January 16, 2024, the Court entered a *Final Decree Closing Certain of the Chapter 11 Cases* [Case No. 23-90054, Dkt. No. 1043] (the "Final Decree") closing each of the Debtors' chapter 11 cases except the above-captioned case of Auto Plus Auto Sales LLC, Case No. 23-90055 (defined as the "Remaining Case"). The Final Decree provides in relevant part that:

Any actions with regard to the Remaining Matters, including with respect to the Claims Reconciliation Process..., whether currently pending in an Affiliate Case or not, shall be filed, administered, and adjudicated in the Remaining Case without the need to reopen any Affiliate Case. Any failure of the Wind-Down Debtors, or any entity authorized pursuant to the Plan, as applicable, to file an objection to any claim against or interest in any Wind-Down Debtor on or prior to entry of this Final Decree shall not constitute allowance of the claim or interest and shall not result in such claim or interest being deemed allowed against or in any Wind-Down Debtor. Any objections to claims against or interests in the Wind-Down Debtors may be filed, administered, and adjudicated in the Remaining Case.

Final Decree, ¶ 5. The Final Decree further states that "the GUC Trust may undertake all actions and discharge all duties in accordance with the Plan and Confirmation Order in the Remaining Case to the same extent it could have undertaken or performed such actions or duties in the closed cases, notwithstanding entry of this Order." *Final Decree*, ¶ 9.

GUC Claims Reconciliation

15. On August 10, 2023, the Court entered an *Order (I) Approving Omnibus Claim Objection Procedures and (II) Authorizing the Debtors to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007* [Case No. 23-90054, Dkt. No. 850] (the "Omnibus Objection Procedures Order") authorizing the Debtors and their successors, including the GUC Trustee, to file substantive omnibus objections to claims in accordance with the terms thereof and

the *Procedures for Filing Omnibus Claims Objections* attached thereto as Exhibit 1 (the "Omnibus Objection Procedures"). The Omnibus Objection Procedures Order authorizes the filing of omnibus claim objections for both scheduled claims and filed proofs of claim in these cases.

16. The GUC Trustee has sole authority to object to and reconcile General Unsecured Claims under the Plan, among other things. Article VII of the Plan provides, in relevant part, as follows:

The GUC Trustee shall have the sole authority to: (a) File, withdraw or litigate to judgment, objections to General Unsecured Claims; (b) settle or compromise any Disputed General Unsecured Claim without any further notice to or action, order or approval by the Bankruptcy Court; and (c) direct the Claims and Noticing Agent to adjust the claims register to reflect any such resolutions without any further notice to or action, order or approval by the Bankruptcy Court. To the extent that the Debtors and/or the Committee Filed objections to General Unsecured Claims that remain pending as of the Effective Date, the GUC Trustee shall be substituted as the objecting party without further action of the parties or order of the Bankruptcy Court.

See Plan, 37, Art. VII.B.1.

17. Accordingly, the GUC Trustee has standing and authority to file this Objection.

18. The GUC Trustee and his professionals have worked diligently to review and assess claims filed against the Debtors, including any supporting documentation filed with such proofs of claim, the Debtors' books and records, and the claims register maintained by the Claims Agent in these cases (the "Claims Register"). Based on such investigations, as detailed below and in the attached Declaration, the GUC Trustee has identified numerous claims that were listed on the Debtors' Bankruptcy Schedules as either contingent, disputed, and/or unliquidated.

Basis for Relief

19. A filed proof of claim is deemed allowed, unless a party in interest objects. 11 U.S.C. § 502(a). Section 502(b) lists nine separate grounds for disallowing a claim, including that "proof of such claim is not timely filed[.]" 11 U.S.C. § 502(b)(1)-(9). Section 502(b) also provides

that "if such objection is made, the court...shall determine the amount of such claim...and shall allow such claim in such amount, except to the extent that such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law...." 11 U.S.C. §502(b). In addition, Bankruptcy Rule 3007(d) provides that objections to amended claims, duplicate claims, and claims not timely filed, among others, may be joined in an omnibus objection. *See* FED. R. BANKR. P. 3007(d).

20. A properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. FED. R. BANKR. P. 3001(f). To receive the benefit of *prima facie* validity, however, a proof of claim must assert factual allegations that would entitle the claimant to a recovery. *In re Heritage Org., LLC*, 04-35574 (BJH), 206 WL 6508477, at *8 (Bankr. N.D. Tex. Jan. 27, 2006). A claim that is based on a writing must attach the underlying writing or provide an explanation of the loss or destruction or such writing. *See* FED. R. BANKR. P. 3001(c). Without complying with the requirements of Bankruptcy Rule 3001(c), if applicable, a claim is not entitled to *prima facie* validity. *See, e.g. eCast Settlement Corp. v. Tran (In re Tran)*, 369 B.R. 312, 317 (S.D. Tex. 2007).

21. A claimant's proof of claim is entitled to the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) only until an objecting party refutes at least one of the allegations that is essential to the claim's legal sufficiency. *In re Starnes*, 231 B.R. 903, 912 (N.D. Tex. 1998). Once an allegation is refuted, "the burden shifts to the claimant to prove by a preponderance of the evidence." *In re Congress, LLC*, 529 B.R. 213, 219 (Bankr. W.D. Tex. 2015); *see also Cavu/Rock Props. Project I, LLC v. Gold Star Constr., Inc. (In re Cavu/Rock Props. Project I, LLC)*, 516 B.R. 414, 422 (Bankr. W.D. Tex. 2014). Despite this shifting burden during the claim objection process,

"the ultimate burden of proof always lies with the claimant." *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep't of Rev.*, 530 U.S. 15 (2000)).

22. An objection to a proof of claim must be made in writing, and the claimant must be provided with not less than thirty days' notice of the hearing to be held in respect of such objection. *See* FED. R. BANKR. P. 3007(a).

23. Objections to multiple claims may be joined in an omnibus objection if such objections are based on the grounds that the claims should be disallowed, in whole or in part, for any of eight enumerated reasons. *See* FED. R. BANKR. P. 3007(d). In addition to the enumerated reasons in Bankruptcy Rule 3007(d), the Omnibus Objection Procedures Order authorizes omnibus claim objections based on any of the "Additional Grounds" set forth in the Omnibus Objection Procedures.

Objection to Scheduled CDU Claims

24. The GUC Trustee objects to each claim listed on Schedule 1 to the Proposed Order for the reasons stated herein. The Scheduled CDU Claims identified on Schedule 1 are "Disputed Claims" under the Plan, because each claim is listed in the Debtors' Bankruptcy Schedules as either contingent, disputed, and/or unliquidated. *See Plan* at 8, (definition of "Disputed Claim"). Since each of the Bar Dates have passed, the Scheduled CDU Claims cannot become Allowed Claims under the Plan.

25. Additionally, the Plan provides that:

Any Claim that has been listed in the Schedules as disputed, contingent or unliquidated, and for which no proof of Claim has been timely Filed, is not considered Allowed and shall be expunged without further action and without any further notice to or action, order or approval of the Bankruptcy Court.

Plan at 37, Art.VII.A. Notwithstanding this provision, the GUC Trustee files this Objection out of an abundance of caution to ensure that no claimants rights are infringed prior to expunging the Scheduled CDU Claims from the Claims Register.

26. Consistent with the terms and intent of the *Plan*, the GUC Trustee hereby requests that the Court enter an order disallowing and expunging the Scheduled CDU Claims from the Claims Register.

Reservation of Rights

27. The GUC Trustee reserves the right to object to the Scheduled CDU Claims on any other grounds. If any Scheduled CDU Claims are not disallowed on the grounds asserted herein, the GUC Trustee hereby reserves the right to object to such Scheduled CDU Claims on any other grounds. This Objection is without prejudice to the rights of the GUC Trustee to object to any claim on any grounds whatsoever. Additionally, the GUC Trustee expressly reserves (i) the right to amend, modify, or supplement the objections asserted herein, (ii) the right to file additional objections to the Scheduled CDU Claims, and (iii) the right to object to any other claims on any grounds whatsoever.

28. Nothing contained herein or any actions taken pursuant to such relief is intended or should be construed as: (a) an admission as to the validity of any claim against a Debtor entity or such Debtor entity's estate; (b) a waiver of any party's right to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the GUC Trustee's rights under the Bankruptcy Code or any other applicable law

Separate Contested Matter

29. To the extent that a response is filed regarding any Scheduled CDU Claims and the GUC Trustee is unable to resolve any such response, each such Scheduled CDU Claims, and the Objection as it pertains to such claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Further, the GUC Trustee requests that any order entered by the Court regarding an objection or other reply asserted in response to this Objection be deemed a separate order with respect to each proof of claim.

Notice

30. The GUC Trustee will provide notice of this Objection, pursuant to and in accordance with the Omnibus Objection Procedures Order, to the following parties: (a) the United States Trustee for the Southern District of Texas; (b) counsel to the Wind-Down Debtors and Plan Agent; (c) any party that has requested notice pursuant to Bankruptcy Rule 2002; and (d) all claimants affected by this Objection (and their counsel, where available). The GUC Trustee respectfully submits that such notice is sufficient and proper under the circumstances and that no other or further notice is required.

Conclusion

WHEREFORE, based upon the foregoing, the GUC Trustee respectfully requests that the Court (a) sustain this Objection; (b) enter the attached Proposed Order disallowing the Scheduled CDU Claims; and (c) granting such other and further relief as the Court deems just and proper.

DATED: March 11, 2024

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/ Kyle Woodard

Joseph M. Coleman

State Bar No. 0456610

SDTX No. 16936

John J. Kane

State Bar No. 24066794

SDTX No. 1069650

Kyle Woodard

State Bar No. 24102661

SDTX No. 3596595

901 Main Street, Suite 5200

Dallas, Texas 75202

Telephone: (214) 777-4200

Telecopier: (214) 777-4299

Email: jcoleman@krcl.com

jkane@krcl.com

kwoodard@krcl.com

Counsel for the Auto Parts GUC Trust

Certificate of Service

I hereby certify that on March 11, 2024, a true and correct copy of the foregoing Objection was filed with the Court and served via the Court's Electronic Case Filing system for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Kyle Woodard

Kyle Woodard

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

In re:

AUTO PLUS AUTO SALES LLC,

Wind-Down Debtor.

)
) Chapter 11
)

) Case No. 23-90055 (CML)
)

) (Formerly Jointly Administered
) under Lead Case IEH Auto Parts
) Holding LLC, Case No. 23-90054)

**DECLARATION OF KYLE WOODARD IN SUPPORT OF
GUC TRUSTEE'S SIXTH OMNIBUS OBJECTION TO CLAIMS
(Scheduled CDU Claims: Claimants H-R)**

Pursuant to 28 U.S.C. § 1746, I, Kyle Woodard, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. My name is Kyle Woodard. I am over twenty-one years of age and competent in all respects to make this Declaration. I am an attorney with the law firm of Kane Russell Coleman Logan PC ("KRCL"), which maintains offices for the practice of law at 901 Main Street, Suite 5200, Dallas, Texas 75202, and at 5151 San Felipe, Suite 800, Houston, Texas 77056.

2. KRCL is counsel for the Auto Parts GUC Trust. This Declaration is made in support of the *GUC Trustee's Sixth Omnibus Objection to Claims (Scheduled CDU Claims: Claimants H-R)* (the "Objection")¹ filed contemporaneously herewith. As an attorney with KRCL, I am responsible for overseeing the firm's representation of the GUC Trust and assisting with the GUC Trustee's reconciliation of General Unsecured Claims under the Plan.

¹ Capitalized terms used but not defined in this Declaration shall have the meanings ascribed to them in the Objection.

3. I have reviewed the Claims Register provided to me by the Claims Agent. The Claims Register identifies claims that are marked as either contingent, disputed, or unliquidated on the Bankruptcy Schedules. The Claims Register shows that each Scheduled CDU Claim listed on Schedule 1 to the Proposed Order is marked as either contingent, disputed, and/or unliquidated on the Debtors' Bankruptcy Schedules. Therefore, I believe that each Scheduled CDU Claim should be disallowed and expunged from the Claims Register pursuant to the terms of the Plan.

4. For the avoidance of doubt, my belief that the Scheduled CDU Claims should be disallowed and expunged is based solely on information contained in the Claims Register and/or the Bankruptcy Schedules. This Declaration is not based on any specific factual knowledge beyond what may be ascertained from the Claims Register and the Bankruptcy Schedules.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED: March 11, 2024
Dallas County, Texas

/s/ Kyle Woodard

Kyle Woodard
Texas Bar No. 24102661
SDTX No. 3596595

and 1409; (iv) that the relief sought in the Objection is in the best interests of the Debtors' estates, their creditors, and other parties in interest; (v) that notice of the Objection and the opportunity for a hearing on the Objection were appropriate under the circumstances, such that no other or further notice is necessary; and (vi) that the legal and factual bases set forth in the Objection establish just cause for the relief granted in the following order (this "Order"),

IT IS HEREBY ORDERED THAT:

1. Each Scheduled CDU Claim identified on Schedule 1 attached to this Order is hereby disallowed in its entirety and shall be expunged from the Claims Register, pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code") and rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and such Scheduled CDU Claim shall be expunged from the Claims Register.

2. This Order does not affect proofs of claim, if any, filed by the claimants identified on Schedule 1 (collectively, the "Claimants"). Any proofs of claim filed by the Claimants remain subject in all respects to any other or further objections filed or asserted by the GUC Trustee, and such proofs of claim shall be allowed or disallowed in accordance with the Plan and any other or further orders of this Court.

3. Kurtzman Carson Consultants LLC, as claims, noticing, and solicitation agent (the "Claims Agent"), is authorized and directed to update the Claims Register maintained in these chapter 11 cases to reflect the relief granted in this Order.

4. This Order shall be, and hereby is, deemed a separate order with respect to each Scheduled CDU Claims. Each Scheduled CDU Claim identified in Schedule 1 and the GUC Trustee's objections to each such claim constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014.

5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity; (b) a waiver of the rights of the GUC Trustee, the Wind-Down Debtors, or the Plan Agent, as applicable, to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified in the Objection or this Order; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of any rights of the GUC Trustee, the Wind-Down Debtors, or the Plan Agent under the Bankruptcy Code or any other applicable law.

6. The GUC Trustee, the Claims Agent, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

7. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall prejudice to the rights of the GUC Trustee, the Wind-Down Debtors, or the Plan Agent to object to any claims on any grounds whatsoever. The GUC Trustee expressly reserves the right to object to any remaining General Unsecured Claims asserted against the Debtors or their bankruptcy estates on any grounds whatsoever, including, without limitation, any proofs of claim filed by the Claimants identified on Schedule 1.

8. This Order and all relief granted herein shall be effective immediately upon entry.

9. This Court retains exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Dated: _____, 2024

CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

IEH Auto Parts (Auto Plus)
Scheduled CDU Claims

3/6/2024

Schedule 1
Scheduled CDU Claims
Claimants H-R

Reason for Disallowance: Each Claim is listed on the Debtors' Schedules as either contingent, disputed, and/or unliquidated.

Disallowed Claims							
Schedule ID	Claimant	Debtor Name	Schedule	Cont.	Disp.	Unliq.	Amount
3277118	Hagy, Robin M	IEH Auto Parts LLC	Sch. F	X	X	X	\$ -
3277119	Harris, Louise	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276411	Henderlite, Glenn R	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277120	Hennessey, Kristian	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277121	Henry, Tiffany	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277122	Hernandez de Abre, Johanna	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277123	Hernandez, Arianna	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276420	HIGHLINE-WARREN LLC	IEH Auto Parts LLC	Sch. F			X	2,521,477.62
3277124	Hill, Nancy	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276425	Hollenbeck, Jerry J	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277125	Hollenbeck, Jerry J	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276443	Ideal Clamp Products Inc.	IEH Auto Parts LLC	Sch. F			X	30,050.72
3277126	Insurance Group, Safety	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276453	INTERSTATE BATTERIES	IEH Auto Parts LLC	Sch. F			X	4,414,738.61
3276464	ITW PERMATEX, INC.	IEH Auto Parts LLC	Sch. F			X	2,407.93
3276475	JDL CORP PROSTOCK AUTOMOTIVE WHSE	IEH Auto Parts LLC	Sch. F			X	57,322.55
3276490	Johnson, Carolyn D	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277127	Johnson, Robin	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276491	Jones, John P	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276492	Jones, Thomas	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276500	Julien, Syonne	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277128	Kemp, Jasmine	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277129	Kivler, Russell	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276517	Krotje, Anne	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276534	Lawyer, Eddie L	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277130	Lebaron, Gary	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276537	Lee, Howard	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276541	Leonard, Edward	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276542	LESCO PAPER AND BOX COMPANY	IEH Auto Parts LLC	Sch. F			X	4,737.55
3277131	Lozano, Carlos	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276561	MACHIMPEX USA LLC	IEH Auto Parts LLC	Sch. F			X	68,607.06
3276569	MANN + HUMMEL PUROLATOR FILTERS LLC	IEH Auto Parts LLC	Sch. F			X	17,489,333.44
3276571	Manosalvas, Orlando	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276574	Marquez, Juan G	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277132	Marsden, Ronald	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277133	Martinez, Brandon E	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277134	Mathis, Gary	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277135	McCrary, Edwin	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277136	McDonald, Deron	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277137	McGurk, Joe	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277138	McKnight, Sean	IEH Auto Parts LLC	Sch. F	X	X	X	-

IEH Auto Parts (Auto Plus)
Scheduled CDU Claims

3/6/2024

Disallowed Claims								
	Schedule ID	Claimant	Debtor Name	Schedule	Cont.	Disp.	Unliq.	Amount
42	3277139	MCNAIR, AYESHA	IEH Auto Parts LLC	Sch. F	X	X	X	-
43	3276585	MEDCO TOOL	IEH Auto Parts LLC	Sch. F			X	173,602.58
44	3277140	Medina, German	IEH Auto Parts LLC	Sch. F	X	X	X	-
45	3277141	Melendez, Carol	IEH Auto Parts LLC	Sch. F	X	X	X	-
46	3277142	Milian, Iraida	IEH Auto Parts LLC	Sch. F	X	X	X	-
47	3276612	MILTON INDUSTRIES INC.	IEH Auto Parts LLC	Sch. F			X	529,843.64
48	3276614	MINT CONDITION FRANCHISING INC	IEH Auto Parts LLC	Sch. F			X	1,494.00
49	3276622	Molina, Theodoro	IEH Auto Parts LLC	Sch. F	X	X	X	-
50	3276624	MONROE AUTO EQUIPMENT CO	IEH Auto Parts LLC	Sch. F			X	4,849,359.84
51	3276625	Montanez, Pierson	IEH Auto Parts LLC	Sch. F	X	X	X	-
52	3277143	MPH Enterprise LLC, .	IEH Auto Parts LLC	Sch. F	X	X	X	-
53	3276653	Negron, Jose	IEH Auto Parts LLC	Sch. F	X	X	X	-
54	3277144	Newell, Kenneth A	IEH Auto Parts LLC	Sch. F	X	X	X	-
55	3276661	NICKSON INDUSTRIES INC.	IEH Auto Parts LLC	Sch. F			X	20,648.41
56	3277145	NICOSIA, Michael G	IEH Auto Parts LLC	Sch. F	X	X	X	-
57	3276674	NORTHERN BATTERY	IEH Auto Parts LLC	Sch. F			X	868,659.76
58	3276679	O Connor, John	IEH Auto Parts LLC	Sch. F	X	X	X	-
59	3276682	ODM TRANSMISSION TECH CO LTD	IEH Auto Parts LLC	Sch. F			X	93,732.08
60	3276683	Odom, Thomas B	IEH Auto Parts LLC	Sch. F	X	X	X	-
61	3276684	ODonnell, Dennis R	IEH Auto Parts LLC	Sch. F	X	X	X	-
62	3277146	Orendain, Rosario	IEH Auto Parts LLC	Sch. F	X	X	X	-
63	3276717	Pearl Tamayo	IEH Auto Parts LLC	Sch. F	X	X	X	-
64	3277147	Penelec, .	IEH Auto Parts LLC	Sch. F	X	X	X	-
65	3277148	Penn, Kathryn	IEH Auto Parts LLC	Sch. F	X	X	X	-
66	3277149	Perez, Dalgis	IEH Auto Parts LLC	Sch. F	X	X	X	-
67	3277150	Phelan, Rachael	IEH Auto Parts LLC	Sch. F	X	X	X	-
68	3276731	PHELPS SECURITY INC.	IEH Auto Parts LLC	Sch. F			X	9,712.26
69	3277151	PHILADELPHIA, CITY OF	IEH Auto Parts LLC	Sch. F	X	X	X	-
70	3276733	Phillips, Alan J	IEH Auto Parts LLC	Sch. F	X	X	X	-
71	3277152	Phillips, Katherine	IEH Auto Parts LLC	Sch. F	X	X	X	-
72	3277153	Pierson, Dale	IEH Auto Parts LLC	Sch. F	X	X	X	-
73	3276740	Pisano, Anthony J	IEH Auto Parts LLC	Sch. F	X	X	X	-
74	3277154	Poretta, Jenna	IEH Auto Parts LLC	Sch. F	X	X	X	-
75	3276751	POWERS PAPER COMPANY INC	IEH Auto Parts LLC	Sch. F			X	104,677.58
76	3276772	PRIETO, REYNALDO	IEH Auto Parts LLC	Sch. F	X	X	X	-
77	3276774	PRINT CHOICES	IEH Auto Parts LLC	Sch. F			X	4,547.40
78	3277155	QUINONES, DELMA	IEH Auto Parts LLC	Sch. F	X	X	X	-
79	3276800	Ralston Jr, George D	IEH Auto Parts LLC	Sch. F	X	X	X	-
80	3276801	Ramirez, Orlando A	IEH Auto Parts LLC	Sch. F	X	X	X	-
81	3276802	RANDSTAD USA	IEH Auto Parts LLC	Sch. F			X	6,808.48
82	3277156	Rideout, Nicole	IEH Auto Parts LLC	Sch. F	X	X	X	-
83	3276816	Rivera, Arielle M	IEH Auto Parts LLC	Sch. F	X	X	X	-
84	3277157	RIVERA, RAYMOND	IEH Auto Parts LLC	Sch. F	X	X	X	-
85	3277158	Rodriguez Colon, Ramon	IEH Auto Parts LLC	Sch. F	X	X	X	-
86	3277159	Rodriguez, Ana	IEH Auto Parts LLC	Sch. F	X	X	X	-
87	3277160	Rodriguez, Ana M	IEH Auto Parts LLC	Sch. F	X	X	X	-
88	3276825	Rodriguez, Angel	IEH Auto Parts LLC	Sch. F	X	X	X	-

IEH Auto Parts (Auto Plus)
Scheduled CDU Claims

3/6/2024

89
90
91
92

Disallowed Claims							
Schedule ID	Claimant	Debtor Name	Schedule	Cont.	Disp.	Unliq.	Amount
3276826	Rodriguez, Erasmo	IEH Auto Parts LLC	Sch. F	X	X	X	-
3277161	Rodriguez, Victor J	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276828	Romanyk, Myron	IEH Auto Parts LLC	Sch. F	X	X	X	-
3276831	Rowcliffe, Ronald L	IEH Auto Parts LLC	Sch. F	X	X	X	-

Total: \$ 31,251,761.51