

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

In re:	§	Chapter 11
	§	
IEH AUTO PARTS HOLDING, LLC, <i>et al.</i> ,	§	Case No. 23-90054
	§	
Debtors.	§	
	§	

**LIMITED OBJECTION TO DEBTORS’ EMERGENCY MOTION FOR ENTRY OF AN
ORDER (I) RESETTING THE COMBINED HEARING DATE AND (II) EXTENDING
CERTAIN DEADLINES RELATED THERETO
[Relates to Doc. No. 607]**

Olaya Z. Goodman (“Goodman”), a creditor in this action, files this limited objection to the Debtors’ motion for entry of an order (I) resetting the combined hearing date and (II) extending certain deadlines related thereto asserting that given the request of the Debtors’ that the Plan Supplement deadline be extended that the deadline for the objection to the final approval of the disclosure statement and Plan and voting deadline should be correspondingly extended to June 13, 2023. In further support Goodman states as follows:

1. Ms. Goodman is a plaintiff in litigation with the Debtor. She suffered a work related motor vehicle crash and suffered severe injuries to her neck, back and bilateral shoulders and was disabled from working.
2. The original deadlines in the case anticipated the Plan Supplement being filed before the voting and objection deadlines for the final approval of the disclosure statement and Plan.
3. Goodman’s counsel reached out to Debtor’s counsel inquiring about the Plan Supplement on May 23, 2023 and raised other questions related to the Plan. The Debtors have not had an opportunity to respond to that inquiry as of this date.



4. On May 24, 2023, the Debtor filed a motion to extend the deadline for filing the Plan Supplement.
5. Goodman's counsel reached out to Debtor's counsel seeking an agreement that the voting and objection deadline also be correspondingly extended. Debtor's counsel has not had an opportunity to respond as of the filing of this objection.
6. Goodman respectfully requests that the voting and objection deadline be extended for her to June 12, 2023 to provide an opportunity to review the full plan and liquidation analysis before objection in order to prevent the need to file a protective objection and then file a supplement or amendment after the Debtor files its exhibits to the Plan and Plan Supplement.
7. Goodman proposes the following changes in red:

Event	Original Date	New Date
Voting Record Date	May 1, 2023	N/A
Hearing on Conditional Approval of the Disclosure Statement	Tuesday, May 2, 2023, at 10:00 a.m. (prevailing Central Time)	N/A
Deadline for Plan Solicitation and Mailing and Publication of Confirmation Hearing Notice	Four (4) Business Days after entry of the Order conditionally approving the Disclosure Statement	N/A
Deadline for Filing Plan Supplement	Wednesday, May 24, 2023	Friday, June 9, 2023
Voting Deadline	Friday, May 26, 2023, at 4:00 p.m. (prevailing Central Time)	Monday, June 12, 2023 at 4:00 pm (prevailing Central Time)
Deadline for Objecting to Disclosure Statement and Confirmation of the Plan	Friday, May 26, 2023, at 5:00 p.m. (prevailing Central Time)	Monday, June 12, 2023 at 5:00 pm (prevailing Central Time)
Deadline for Filing Voting Report	Tuesday, May 30, 2023	Tuesday, June 13, 2023
Combined Hearing on Final Approval of the Disclosure Statement and Plan Confirmation	Wednesday, May 31, 2023, at 1:00 p.m. (prevailing Central Time)	Friday, June 16, 2023 at 3:00 p.m. (prevailing Central Time)

WHEREFORE, Goodman respectfully requests that the Plan objection deadling and Plan voting deadline be extended to June 12, 2023 to correspond with the extensions the Debtors request.

DATED: May 25, 2023

Respectfully submitted,

/s/ Deirdre Carey Brown

Deirdre Carey Brown

State Bar No. 24049116

FORSHEY PROSTOK, LLP

1990 Post Oak Blvd., Suite 2400

Houston, TX 77056

Telephone: (832) 536-6910

Facsimile: (832) 310-1172

dbrown@forsheyprostok.com

COUNSEL FOR OLAYA GOODMAN

CERTIFICATE OF SERVICE

I hereby certify a copy of the limited objection was served on all parties registered to receive ecf notice.

/s/ Deirdre Carey Brown

Deirdre Carey Brown

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**ORDER GRANTING OLAYA GOODMAN AN
EXTENSION TO VOTE AND OBJECT TO PLAN**

The Court having considered the limited objection of Olaya Goodman grants Ms. Goodman the relief requested and the deadlines for her vote and/or objection on the final approval of the disclosure statement and plan to be as follows:

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