

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>YELLOW CORPORATION, <i>et al.</i>,¹</p> <p>Debtors.</p>	<p>Chapter 11</p> <p>Case No. 23-11069 (CTG)</p> <p>(Jointly Administered)</p>
<p>YRC INC., YELLOW LOGISTICS, INC., USF HOLLAND LLC, USF REDDAWAY INC., NEW PENN MOTOR EXPRESS, LLC, and YRC ENTERPRISE SERVICES, INC.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>FIRST BRANDS GROUP, LLC, ASC INDUSTRIES, INC., BRAKE PARTS INC LLC, CARTER FUEL SYSTEMS, LLC, CHAMPION LABORATORIES, INC., CWD, LLC, FRAM GROUP OPERATIONS LLC, HORIZON GLOBAL AMERICAS INC., INTERNATIONAL BRAKE INDUSTRIES, INC., TRICO PRODUCTS CORPORATION, and WALBRO LLC,</p> <p>Defendants.</p>	<p>Adv. Proc. No. 25-51852 (CTG)</p> <p>Re: Adv. Proc. D.I. 1</p>

**CERTIFICATION OF COUNSEL REGARDING THE PARTIES' JOINT
STIPULATION ON AN EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

The undersigned counsel for First Brands Group, LLC, ASC Industries, Inc., Brake Parts Inc LLC, Carter Fuel Systems, LLC, Champion Laboratories, Inc., CWD, LLC, Fram Group

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

Operations LLC, Horizon Global Americas Inc., International Brake Industries, Inc., Trico Products Corporation, and Walbro LLC (collectively, “Defendants”), hereby certifies as follows:

1. On August 5, 2025, YRC Inc., Yellow Logistics, Inc., USF Holland LLC, USF Reddaway Inc., New Penn Motor Express, LLC, and YRC Enterprise Services, Inc. (collectively, “Plaintiffs” and with Defendants, “Parties”) filed a *Complaint*. See Adv. Proc. D.I. 1.

2. The Parties have entered into a *Joint Stipulation on an Extension of Time to Respond to the Complaint* (“Stipulation”), pursuant to which the Parties have agreed that (1) Defendants shall have a 31-day extension of time in which to respond to the Complaint, making their new response deadline October 6, 2025, and (2) the Parties may extend this deadline further by agreement.

3. Attached as **Exhibit “A”** is a proposed form of *Order Approving the Parties’ Joint Stipulation on an Extension of Time to Respond to the Complaint* (“Proposed Order”). The Stipulation is attached as **Exhibit 1** to the Proposed Order.

4. The Proposed Order will neither prejudice the Parties nor the Court’s administration of this adversary proceeding.

WHEREFORE, Defendants respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit “A”**, at the Court’s earliest convenience.

Dated: August 27, 2025

FOX ROTHSCHILD LLP

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EXHIBIT A
(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: YELLOW CORPORATION, <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 23-11069 (CTG) (Jointly Administered)
YRC INC., YELLOW LOGISTICS, INC., USF HOLLAND LLC, USF REDDAWAY INC., NEW PENN MOTOR EXPRESS, LLC, and YRC ENTERPRISE SERVICES, INC., Plaintiffs, v. FIRST BRANDS GROUP, LLC, ASC INDUSTRIES, INC., BRAKE PARTS INC LLC, CARTER FUEL SYSTEMS, LLC, CHAMPION LABORATORIES, INC., CWD, LLC, FRAM GROUP OPERATIONS LLC, HORIZON GLOBAL AMERICAS INC., INTERNATIONAL BRAKE INDUSTRIES, INC., TRICO PRODUCTS CORPORATION, and WALBRO LLC, Defendants.	Adv. Proc. No. 25-51852 (CTG) Re: Adv. Proc. D.I. 1

**ORDER APPROVING THE PARTIES' JOINT STIPULATION
ON AN EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

Upon consideration of the Parties' *Joint Stipulation on an Extension of Time to Respond to the Complaint* ("Stipulation"),² a copy of which is attached hereto as **Exhibit 1**; and the Court having jurisdiction to consider the Stipulation pursuant to 28 U.S.C. §§ 157 and 1334; and good and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT the Stipulation, attached hereto as **Exhibit 1**, is **APPROVED**; and it is

FURTHER ORDERED that Defendants' deadline to respond to the Complaint is now October 6, 2025; and it is

FURTHER ORDERED that the Parties may extend this deadline further by agreement.

² Capitalized terms not defined herein shall have the meaning ascribed to such terms in the Stipulation.

EXHIBIT 1
(Stipulation)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: YELLOW CORPORATION, <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 23-11069 (CTG) (Jointly Administered)
YRC INC., YELLOW LOGISTICS, INC., USF HOLLAND LLC, USF REDDAWAY INC., NEW PENN MOTOR EXPRESS, LLC, and YRC ENTERPRISE SERVICES, INC., Plaintiffs, v. FIRST BRANDS GROUP, LLC, ASC INDUSTRIES, INC., BRAKE PARTS INC LLC, CARTER FUEL SYSTEMS, LLC, CHAMPION LABORATORIES, INC., CWD, LLC, FRAM GROUP OPERATIONS LLC, HORIZON GLOBAL AMERICAS INC., INTERNATIONAL BRAKE INDUSTRIES, INC., TRICO PRODUCTS CORPORATION, and WALBRO LLC, Defendants.	Adv. Proc. No. 25-51852 (CTG) Re: Adv. Proc. D.I. 1

**THE PARTIES' JOINT STIPULATION
ON AN EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

WHEREAS, August 5, 2025, YRC Inc., Yellow Logistics, Inc., USF Holland LLC, USF Reddaway Inc., New Penn Motor Express, LLC, and YRC Enterprise Services, Inc. (collectively, “Plaintiffs”) filed a *Complaint*, see Adv. Proc. D.I. 1;

WHEREAS, First Brands Group, LLC, ASC Industries, Inc., Brake Parts Inc LLC, Carter Fuel Systems, LLC, Champion Laboratories, Inc., CWD, LLC, Fram Group Operations LLC, Horizon Global Americas Inc., International Brake Industries, Inc., Trico Products Corporation, and Walbro LLC (collectively, “Defendants” and with Plaintiffs, “Parties”) and Plaintiffs have now entered into this *Joint Stipulation on an Extension of Time to Respond to the Complaint* (“Stipulation”), pursuant to which the Parties have agreed that (1) Defendants shall have a 31-day extension of time in which to respond to the Complaint, making their new response deadline October 6, 2025, and (2) the Parties may extend this deadline further by agreement.

NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the Defendants and Plaintiffs, through their undersigned counsel, as follows:

1. The Defendants’ deadline to respond to the Complaint is now October 6, 2025.
2. The Parties may extend this deadline further by agreement.

[Signature page follows]

Dated: August 27, 2025
Wilmington, Delaware

/s/ Seth A. Niederman

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