

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

In re:	)	
	)	Chapter 11
ACCURIDE CORPORATION, <sup>1</sup>	)	
	)	Case No. 24-12289 (JKS)
Reorganized Debtor.	)	
	)	
	)	<b>Hearing Date: January 21, 2026 at 10:30 a.m. (ET)</b>
	)	<b>Objection Deadline: January 7, 2026 at 4:00 p.m. (ET)</b>

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**REORGANIZED DEBTOR’S MOTION FOR ENTRY OF AN ORDER  
AND FINAL DECREE (I) CLOSING THE CHAPTER 11 CASE; (II) TERMINATING  
CLAIMS AND NOTICING SERVICES; AND (III) GRANTING RELATED RELIEF**

The above-captioned reorganized debtor (the “Reorganized Debtor” and collectively with certain of its affiliates prior to the Effective Date (as defined below), the “Debtors”)<sup>2</sup> state as follows in support of this motion (this “Motion”):

**RELIEF REQUESTED**

1. The Reorganized Debtor seeks entry of an order and final decree (the “Proposed Order and Final Decree”), substantially in the form attached hereto as **Exhibit A**, (i) authorizing the Reorganized Debtor to close the chapter 11 case (the “Chapter 11 Case”); (ii) terminating the claims and noticing services provided by Omni Agent Solutions, Inc. (“Omni”); and (iii) granting related relief.

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<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is Accuride Corporation (9077). The Reorganized Debtor’s service address is: 38777 Six Mile Road, Suite 410, Livonia, MI 48152.

<sup>2</sup> In accordance with the Plan (defined below), the “Reorganized Debtor” means the Debtors from and after the Effective Date of the Plan. Any references to “Reorganized Debtor” herein shall also refer to the Debtors, as and when applicable.

## **JURISDICTION AND VENUE**

2. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Reorganized Debtor confirms its consent pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory and legal predicates for the relief requested herein are sections 105(a) and 350(a) of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) and Local Rule 3022-1.

## **BACKGROUND**

5. On October 9, 2024 (the “Petition Date”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On October 11, 2024, this Court entered an order directing the joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) [Docket No. 75]. On October 22, 2024, the U.S. Trustee appointed an official committee of unsecured creditors [Docket No. 127] (the “Committee”). On December 10, 2024, the U.S. Trustee appointed an official committee of retirees [Docket No. 424].

6. On October 11, 2024, the Court entered the *Order (I) Authorizing and Approving the Appointment of Omni Agent Solutions, Inc. as Claims and Noticing Agent and (II) Granting Related Relief* [Docket No. 83] (the “Omni Retention Order”) authorizing the retention of Omni

as the Debtors' claims and noticing agent to provide the services as set forth in the Omni Retention Order.

7. On February 12, 2025, the Court entered the *Findings Of Fact, Conclusions Of Law, And Order (I) Approving the Disclosure Statement on a Final Basis and (II) Confirming the Second Modified Amended Joint Plan of Reorganization of Accuride Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 704], and on March 6, 2025, the Court entered the *Supplemental Order Regarding Order (I) Approving the Disclosure Statement on a Final Basis and (II) Confirming the Second Modified Amended Joint Plan of Reorganization of Accuride Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 821] (together, the "Confirmation Order"). The Confirmation Order confirmed the *Second Modified Amended Joint Plan of Reorganization of Accuride Corporation and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 692] (as amended, supplemented, or modified from time to time, the "Plan").

8. On March 7, 2025, the Plan went effective [Docket No. 824] (the "Effective Date").

9. On May 12, 2025, the Court entered the *Order and Final Decree Closing Certain of the Debtors' Chapter 11 Cases* [Docket No. 972], which closed all of the Debtors' chapter 11 cases except for the above-captioned case.

10. Pursuant to Local Rule 3022-1(a)(ii), the Reorganized Debtor will file the verified final report (the "Verified Final Report") at least 14 days prior to the scheduled hearing on January 21, 2026 at 10:30 a.m. (ET). Subject to the Court's review and approval of the Verified Final Report, the Court's role in the administration of the Chapter 11 Case will be complete.

**BASIS FOR RELIEF**

**A. The Chapter 11 Case Has Been Fully Administered**

11. After a debtor's estate is fully administered, the Court, on its own motion or on motion of a party-in-interest, must grant a final decree closing the chapter 11 case. *See* 11 U.S.C. § 350(a); *see also* Fed. R. Bankr. P. 3022 (“After an estate is fully administered in a Chapter 11 case, the court must, on its own or on a party in interest’s motion, enter a final decree closing the case.”).

12. Although “fully administered” is not defined in the Bankruptcy Code, courts frequently have considered the following non-exclusive factors set forth in the Advisory Committee’s Note to Rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in determining whether a case has been fully administered: (a) whether the order confirming the plan has become final; (b) whether deposits required by the plan have been distributed; (c) whether the property proposed by the plan to be transferred has been transferred; (d) whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan; (e) whether payments under the plan have commenced; and (f) whether all motions, contested matters, and adversary proceedings have been finally resolved.

13. Courts in this District and others have adopted the view that these factors are a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed. *See In re SS Body Armor I, Inc.*, No. 10-11255 (CSS), 2021 WL 2315177, at \*9 (Bankr. D. Del. June 7, 2021) (discussing and applying six factors listed in the Committee Note); *In re SLI, Inc.*, Case No. 02-12608 (WS), 2005 WL 1668396, at \*2 (Bankr. D. Del. June 24, 2005); *see also In re Omega Optical, Inc.*, 476 B.R. 157, 167 (Bankr. E.D. Pa. 2012); *In re Ginko Assocs., L.P.*, No. 05-19436 (BF), 2009 WL 2916917, at \*2 (Bankr. E.D. Pa. June 25,

2009); *In re Kliegl Bros. Universal Elec. Stage Lightning Co., Inc.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999) (“The factors set forth in the [Committee] Note are plainly an aid or checklist that serves to insure that there is no unfinished business before the Court or in the case.”).

14. The foregoing factors weigh strongly in favor of entry of the Proposed Order and Final Decree closing the Chapter 11 Case. The reconciliation and payment of certain claims has either been completed or is in the process of being completed.<sup>3</sup>

15. In addition, all expenses arising from the administration of the Chapter 11 Case, including Court fees, U.S. Trustee fees, and professional fees and expenses, have been paid or will be paid in the amounts due as soon as reasonably practicable after the closure of the Chapter 11 Case and the Reorganized Debtor will complete all remaining quarterly reports within thirty (30) days of the Chapter 11 Case being closed.

16. Accordingly, the Reorganized Debtor submits that there is ample justification for entry of a final decree closing the Chapter 11 Case, and request that the Court enter the Proposed Order and Final Decree.

## **B. Terminating Claims and Noticing Services**

17. The Reorganized Debtor also requests entry of an order terminating the claims and noticing services (the “Claims and Noticing Services”) provided by Omni. Upon termination of the Claims and Noticing Services, and except as otherwise provided herein, Omni shall have no further obligations to the Court, the Reorganized Debtor, or any other party in interest with respect to the Claims and Noticing Services.

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<sup>3</sup> The Reorganized Debtor has filed the *Reorganized Debtor’s First Omnibus Objection To Claims (Non-Substantive)* and the *Reorganized Debtor’s Second Omnibus Objection To Claims (Substantive)* on which the Response Deadlines (both January 9, 2026 at 4:00 p.m. (ET)), as of the date of filing of this Motion, have not yet expired. Additionally, and filed contemporaneously herewith, the Reorganized Debtor has filed the *Reorganized Debtor’s First Notice of Satisfaction of Claims* on which the Response Deadline is January 7, 2026 at 4:00 p.m. (ET).

18. In accordance with Local Rule 2002-1(e)(ix), within twenty-eight (28) days after entry of the Order and Final Decree, Omni will (i) forward to the Clerk of the Court an electronic version of all imaged proofs of claim, (ii) upload the creditor matrix into CM/ECF, and (iii) file a final claims register containing claims asserted in all of the chapter 11 cases on the docket of the main case.

**NOTICE**

19. Notice of this Motion has been or will be provided to: (i) the U.S. Trustee; and (ii) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested herein, the Reorganized Debtor submits that no other or further notice is necessary.

*[Remainder of Page Intentionally Left Blank]*

**CONCLUSION**

WHEREFORE, the Reorganized Debtor requests entry of the Proposed Order and Final

Decree, granting the relief requested herein and such other and further relief as is just and proper.

Dated: December 24, 2025  
Wilmington, Delaware

*/s/ Jared W. Kochenash*

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

In re:	)	
	)	Chapter 11
ACCURIDE CORPORATION, <sup>1</sup>	)	
	)	Case No. 24-12289 (JKS)
Reorganized Debtor.	)	
	)	<b><u>Hearing Date: January 21, 2026 at 10:30 a.m. (ET)</u></b>
	)	<b><u>Objection Deadline: January 7, 2026 at 4:00 p.m. (ET)</u></b>

**NOTICE OF MOTION**

TO: (I) THE U.S. TRUSTEE FOR THE DISTRICT OF DELAWARE; AND (II) ANY PARTY THAT HAS REQUESTED NOTICE PURSUANT TO BANKRUPTCY RULE 2002

**PLEASE TAKE NOTICE** that the above-captioned reorganized debtor (the “Reorganized Debtor”) has filed the *Reorganized Debtor’s Motion for Entry of an Order and Final Decree (I) Closing the Chapter 11 Case; (II) Terminating Claims and Noticing Services; and (III) Granting Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be filed on or before **January 7, 2026 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, Wilmington, Delaware 19801. At the same time, you must serve a copy of the objection or response upon the undersigned counsel to the Reorganized Debtor so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** THAT A HEARING TO CONSIDER APPROVAL OF THE MOTION IS SCHEDULED FOR **JANUARY 21, 2026 AT 10:30 A.M. (ET)** BEFORE THE HONORABLE J. KATE STICKLES, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5<sup>TH</sup> FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801.

**PLEASE TAKE FURTHER NOTICE** THAT IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

[signature page follows]

<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is Accuride Corporation (9077). The Reorganized Debtor’s service address is: 38777 Six Mile Road, Suite 410, Livonia, MI 48152.

Dated: December 24, 2025  
Wilmington, Delaware

*/s/ Jared W. Kochenash*

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*Co-Counsel for the Reorganized Debtor*

*Co-Counsel for the Reorganized Debtor*

**EXHIBIT A**

**Proposed Order and Final Decree**

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

In re:	)	
	)	Chapter 11
ACCURIDE CORPORATION, <sup>1</sup>	)	
	)	Case No. 24-12289 (JKS)
Reorganized Debtor.	)	
	)	
	)	Ref. Docket No. ____
	)	

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**ORDER AND FINAL DECREE (I) CLOSING THE CHAPTER 11 CASE;  
(II) TERMINATING CLAIMS AND NOTICING SERVICES;  
AND (III) GRANTING RELATED RELIEF**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of the Reorganized Debtor in the above-captioned chapter 11 case for entry of an order and final decree (this “Final Decree”), pursuant to sections 105(a) and 350(a) of the Bankruptcy Code, (i) closing the Chapter 11 Case; (ii) terminating the Claims and Noticing Services of Omni; and (iii) granting related relief, all as more fully set forth in the Motion; and upon consideration of the Motion and all pleadings related thereto; and due and proper notice of the Motion having been given; and this Court having determined that no other or further notice of the Motion is required; and this Court having determined that this Court has jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having determined that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having determined that

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<sup>1</sup> The Reorganized Debtor in this chapter 11 case, along with the last four digits of the Reorganized Debtor’s federal tax identification number, is Accuride Corporation (9077). The Reorganized Debtor’s service address is: 38777 Six Mile Road, Suite 410, Livonia, MI 48152.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The Chapter 11 Case of Accuride Corporation (Case No. 24-12289) (JKS) is hereby closed, effective as of the entry of this Final Decree.
3. Entry of this Final Decree is without prejudice to the rights of the Reorganized Debtor, the U.S. Trustee, or any other party in interest to seek to reopen the Chapter 11 Case.
4. Within thirty (30) days of entry of this Final Decree, the Reorganized Debtor shall (i) file with this Court and provide to the U.S. Trustee all outstanding post-confirmation reports, and (ii) pay all fees due and payable pursuant to 28 U.S.C. § 1930, if any.
5. The Clerk of the Court shall enter this Final Decree on the docket of the Chapter 11 Case and thereafter such docket shall be marked as “Closed.”
6. The Claims and Noticing Services provided by Omni are terminated in accordance with the Motion upon the completion of the services listed in paragraph 7 below. Thereafter, Omni shall have no further obligations to this Court, the Reorganized Debtor, its estate, or any other party in interest with respect to the Claims and Noticing Services.
7. Pursuant to Local Rule 2002-1(e)(ix), within twenty-eight (28) days after the entry of this Final Decree, Omni shall: (a) forward to the Clerk of the Court an electronic version of all imaged proofs of claim; (b) upload the creditor matrix into CM/ECF; and (c) file a final claims register containing claims asserted in the Chapter 11 Case, if any, on the docket of the main case.

8. If Omni receives any mail regarding the Reorganized Debtor or the Reorganized Debtor's estate after entry of this Final Decree, Omni shall collect and forward such mail to the Reorganized Debtor as soon as is practicable.

9. The Reorganized Debtor and Omni are authorized to take all actions that may be necessary to undertake the relief granted in this Final Decree.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Final Decree.

11. Notwithstanding anything to the contrary, the terms and conditions of this Final Decree shall be immediately effective and enforceable upon its entry.