

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Dynamic Aerostructures LLC, *et al.*,
Debtors.¹

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket Nos. 81, 82

DECLARATION OF ERIC N. ELLIS IN SUPPORT OF DEBTORS' MOTION FOR
ENTRY OF ORDER APPROVING SETTLEMENT WITH NORTHROP GRUMMAN
SYSTEMS CORPORATION

I, Eric N. Ellis, hereby declare under penalty of perjury to the best of my knowledge, information, and belief:

1. I am the President and Chief Executive Officer of Forrest Machining LLC, one of the above-captioned debtors and debtors in possession (collectively, the "Debtors" or the "Company"). I make this declaration in support of the *Debtors' Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation* (the "Motion").²

2. I served as the Debtors' President and Chief Operating Officer since May 2023. In December 2023, I assumed the role of President and Chief Executive Officer. I have more than 25 years of experience in the aerospace and defense industry, most recently serving as President of E2 Strategies, LLC, a management consultancy firm in the aerospace and defense market. Prior to my tenure at E2 Strategies, LLC, I spent six years working as Vice President (2016-2018), Senior Vice President (2018-2022), and General Manager of General Dynamics Ordnance and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Dynamic Aerostructures LLC (3076); Dynamic Aerostructures Intermediate LLC (9800); and Forrest Machining LLC (3421). The Debtors' service address is 27756 Avenue Mentry, Valencia, California 91355.

² Capitalized terms used, but not otherwise defined herein, shall have the meanings ascribed to such terms in the Motion.



Tactical Systems, a multi-national aerospace and defense corporation. From 2007 through 2016, I served as Vice President (2007-2010) and President (2010-2016) of L3Harris Fuzing and Ordnance Systems division (f/k/a L3 Communications), a global aerospace and defense corporation. I hold an MBA from Santa Clara University Leavey School of Business, a Bachelor of Science degree in mechanical engineering from Brigham Young University, and have completed executive leadership coursework at the Wharton School Business of the University of Pennsylvania.

3. In my capacity as President and Chief Executive Officer, I am generally familiar with the Debtors' day-to-day operations, business and financial affairs, and books and records, including those facts set forth in the Motion.

4. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge, my discussions with other members of the Debtors' management team and the Debtors' advisors, my review of relevant documents and information concerning the Debtors' operations, financial affairs, and restructuring initiatives, or my opinions based upon my experience and knowledge and information I have reviewed or obtained from the Debtors. The statements in this Declaration are accurate and correct to the best of my knowledge, information, and belief. If called upon as a witness, I could and would testify competently to the facts set forth in this Declaration on that basis.

5. I have reviewed the Motion and the facts set forth therein are true and correct. I, along with the rest of the management team, and in consultation with the Debtors' advisors, have been addressing and continue to address all issues relating to the Debtors' historical and ongoing business relationship with Northrop Grumman Systems Corporation, which is, as indicated in the Motion, a key customer of the Debtors.

6. In connection with such ongoing customer management, the management team and I reviewed the NGSC Settlement and the Motion. As set forth in the Motion, the NGSC Settlement is in the best interests of their estates. The NGSC Settlement includes a waiver of a potential \$4 million dollar claim by NGSC against the Debtors. Critically, the NGSC Settlement also facilitates certain price adjustments and other resolutions that result in a net economic benefit to the Debtors' estates of approximately \$2.5 million. Finally, pursuant to the NGSC Settlement, the Debtors and NGSC have agreed to certain concessions that will avoid any potential disputes in connection with the assumption and assignment of the Debtors' contracts with NGSC to the Stalking Horse Purchaser. In short, the Debtors have sound and reasonable bases for entering into the NGSC Settlement, which, in turn, justify approval of the Motion and the NGSC Settlement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: March 20, 2025

/s/ Eric N. Ellis
Eric N. Ellis
President and Chief Executive Officer
Forrest Machining LLC