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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Dynamic Aerostructures LLC, et al.,¹

Chapter 11

Case No. 25-10292 (LSS)

Debtors.

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to Bankruptcy Code section 1109(b) and Bankruptcy Rule 9010(b), the law firm DLA Piper LLP (US) hereby enters its appearance as counsel to TRM Equity, as a party in interest, in the above-captioned bankruptcy cases (the "<u>Bankruptcy Cases</u>").

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002(i), 3017,

and 9007, the undersigned requests that copies of all notices, pleadings, and all other papers filed or served in the Bankruptcy Cases be given to and served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

> Stuart M. Brown DLA Piper LLP (US) 1201 North Market Street, Suite 2100 Wilmington, Delaware 19801 Telephone: (302) 468-5700 Facsimile: (302) 394-2341 Email: stuart.brown@us.dlapiper.com

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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, CA 91355.



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- and -

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code sections 342 and 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code provisions and Bankruptcy Rules specified above, but also includes, without limitation, any orders and notices of any notice, application, complaint, demand, motion, petition, pleading, disclosure statement or plan of reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, or otherwise filed or made with regard to the Bankruptcy Cases and proceedings therein or which may in any way affect or seek to affect any right or interest of TRM Equity.

PLEASE TAKE FURTHER NOTICE that the filing of this pleading is intended to constitute only a special appearance to the extent that a general appearance would constitute a waiver of any right. TRM Equity does not intend this Notice of Appearance and Request for Service of Notices and Papers, or any subsequent appearance, pleading, proof of claim, or other writing or conduct to constitute a waiver of any: (a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b)

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rights to trial by jury in any proceeding so triable in the Bankruptcy Cases or any case, controversy or proceeding related to the Bankruptcy Cases; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; (d) any objection to the jurisdiction of the Bankruptcy Court for any purpose other than with respect of this notice, or (e) other rights, claims, actions, defenses, setoffs, recoupments to which TRM Equity is or may be entitled, or other matters under any agreement, law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments TRM Equity expressly reserves. TRM Equity's rights are reserved and preserved, without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in the Bankruptcy Cases.

Dated: March 21, 2025 Wilmington, Delaware Respectfully submitted,

DLA PIPER LLP (US)

<u>/s/ Stuart M. Brown</u> Stuart M. Brown (DE 4050) 1201 North Market Street, Suite 2100 Wilmington, Delaware 19801 Telephone: (302) 468-5700 Facsimile: (302) 394-2341 Email: stuart.brown@us.dlapiper.com

- and -

W. Benjamin Winger (*pro hac vice* application forthcoming)
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Counsel for TRM Equity

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of March, 2025, a copy of the foregoing *Notice* of Appearance and Request for Service of Papers was served on all parties receiving CM/ECF notices in this case.

<u>/s/ Stuart M. Brown</u> Stuart M. Brown