

**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)

**NOTICE OF AGENDA FOR THE HEARING
SCHEDULED FOR APRIL 7, 2025, AT 2:00 P.M. (ET)²**

This hearing will be conducted in-person, any exceptions must be approved by chambers.

Parties may observe the hearing remotely by registering with the Zoom link below no later than April 4, 2025, at 4:00 p.m.

To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the court's website at www.deb.uscourts.gov.

The deadline to register for remote attendance is 4 PM (prevailing Eastern Time) the business day before the hearing unless otherwise noticed.

After the deadline has passed an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

I. MATTERS GOING FORWARD

1. Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving

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 All motions and other pleadings referenced herein are available online at the following web address: www.veritaglobal.net/FMIAerostructures.



251029225040300000000001

the Debtors' Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed February 26, 2025 [[Docket No. 16](#)].

Objection Deadline: April 3, 2025 at 4:00 p.m. (ET) for any objection to approval of the sale to the Stalking Horse Purchaser; April 7, 2025 at the time of the sale hearing for any objection to approval of the sale to a Successful Bidder other than the Stalking Horse Purchaser.

Related Pleadings:

- a) Declaration of Rory Keenan in Support of Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed February 26, 2025 [[Docket No. 17](#)].
- b) Notice of Filing of Proposed Order (I) Approving and Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief, filed March 14, 2025 [[Docket No. 106](#)].
- c) Notice of Filing of Schedules to the Asset Purchase Agreement, filed March 17, 2025 [[Docket No. 108](#)].
- d) Order (I) Approving Bidding Procedures for the Sale Of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI)

Authorizing and Approving the Debtors Entry into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief, entered March 25, 2025 [[Docket No. 169](#)].

- e) Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases of the Debtors, filed March 26, 2025 [[Docket No. 171](#)].
- f) Notice of Stalking Horse Purchaser's Intention to Credit Bid, filed March 26, 2025 [[Docket No. 172](#)].
- g) Supplemental Notice of Potential Assumption and Assignment of Executory Contracts and Unexpired Leases of the Debtors, filed March 28, 2025 [[Docket No. 179](#)].
- h) Notice of Successful Bidder and Cancellation of Auction, filed April 2, 2025 [[Docket No. 187](#)].
- i) Certificate of Service, filed April 2, 2025 [[Docket No. 188](#)].
- j) Affidavit of Publication of the Notice of Proposed Sale of Assets, Stalking Horse APA, Bidding Procedures, Auction, and Sale Hearing in the New York Times, filed April 2, 2025 [[Docket No. 189](#)].

Responses Received:

- a) Limited Objection of Mitsubishi Capital America, Inc. to the Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed March 18, 2025 [[Docket No. 110](#)].
- b) Statement of TRM Equity as Potential Bidder Seeking Clarity Regarding Stalking Horse Bidder's Rights, if any, to Credit Bid the Recently

Purchased BMO Debt at the Auction, filed March 21, 2025 [[Docket No. 156](#)].

Status: This matter is going forward.

2. Debtors' Motion to File under Seal, filed March 4, 2025 [[Docket No. 83](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET), extended to March 21, 2025, at 10:00 a.m. (ET) for the U.S. Trustee.

Related Pleadings:

- a) [SEALED] Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation, filed March 4, 2025 [Docket No.82].

Responses Received: Informal comments from the U.S. Trustee.

Status: The Debtors are working with Northrop Grumman Systems Corporation and the Office of the United States Trustee on a suitable form of redacted agreement for filing. The Debtors expect that this will be resolved at or before the hearing. If the matter is not resolved, it will go forward.

Dated: April 3, 2025
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

Robert A. Weber (I.D. No. 4013)

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

Telephone: (302) 295-0192

weber@chipmanbrown.com

desgross@chipmanbrown.com

-and-

CHIPMAN BROWN CICERO & COLE, LLP

Daniel G. Egan (admitted *pro hac vice*)

501 5th Ave. 15th Floor

New York, New York 10017

Telephone: (646) 741-5529

egan@chipmanbrown.com

-and-

ROPES & GRAY LLP

Gregg M. Galardi (No. 2991)

1211 Avenue of the Americas

New York, New York 10036

Telephone: (212) 596-9000

Facsimile: (212) 596-9090

gregg.galardi@ropesgray.com

Counsel to the Debtors and Debtors in Possession