Case 25-10292-LSS Doc 210 Filed 0//15/25 Page 1 of 22 Docket #0210 Date Filed: 04/15/2025

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 No. 133

Objection Deadline: April 29, 2025

DECLARATION OF ORDINARY COURSE PROFESSIONAL

I, Nicole C. Baldwin, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney providing legal services to Hackler Flynn & Associates, APC (the "Firm"), which maintains offices at 479 S. Marengo Avenue, Pasadena, California 91101.

2. This Declaration is submitted in connection with an Order of the United States

Bankruptcy Court for the District of Delaware authorizing the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") to employ and compensate certain professionals in the ordinary course of business during the pendency of their chapter 11 cases.

3. The Debtors have requested that the Firm provide legal services to the Debtors for California employment law and human resources matters, including in connection with pending actions against the Debtors in Los Angeles Superior Court, and the Firm has agreed to provide such services.

4. The Firm is a legal services firm.

The Firm provided services to the Debtors prior to the filing of the Debtors' chapter
11 cases on February 26, 2025.

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.



Case 25-10292-LSS Doc 210 Filed 04/15/25 Page 2 of 22

6. The Firm's current customary rates, subject to change from time to time, are \$520.00 per hour. In the normal course of its business, the Firm revises its billing rates and informs clients during the fourth quarter of each year that rate increases will become effective on January 1 of each year, and the aforementioned rates will be revised to the regular hourly rates which will be in effect at that time.

7. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Debtors or the chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. To the best of my knowledge, the Firm does not perform services for any such person in connection with the chapter 11 cases, or have any relationship with any such person, its attorneys, or its accountants that would be adverse to the Debtors or their estates. To make this assertion, the Firm researched its conflict database against Exhibit A.

8. Neither I nor any attorney of, or professional employed by, the Firm, insofar as I have been able to ascertain, holds, or represents any interest adverse to, the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

9. Neither I nor any attorney of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm, as permitted by 11 U.S.C. § 504(b).

10. The Debtors owe the Firm \$18,013.77 for prepetition services. The Firm holds a retainer of \$40,192.00 that is applicable to post petition services.

11. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its

2

Case 25-10292-LSS Doc 210 Filed 04/15/25 Page 3 of 22

employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

12. I declare under penalty of perjury that, to the best of my knowledge and belief after reasonable inquiry, the foregoing is true and correct.

Executed on this 13 day of April, 2025.

<u>/s/ Nicole C. Baldwin</u> Nicole C. Baldwin, Esq.

EXHIBIT A

List of Parties in Interest

Appendix 1

Potential Parties in Interest¹

1. <u>Debtors</u>

Dynamic Aerostructures LLC Forrest Machining LLC Dynamic Aerostructures Intermediate LLC

2. <u>Debtors' Restructuring Professionals</u>

Berkeley Research Group, LLC Configure Partners, LLC Ropes & Gray LLP Chipman Brown Cicero & Cole, LLP C Street Advisory Group, LLC Verita Global, LLC

3. <u>Restructuring Professionals for Lenders, Trustees, Agents, and Other Secured</u> <u>Parties</u>

King & Spalding LLP Young Conaway Stargatt & Taylor, LLP Katten Muchin Rosenman LLP Womble Bond Dickinson (US) LLP Ernst & Young US LLP

4. Ordinary Course Professionals

Hedman Partners LLP Orrick, Herrington & Sutcliffe LLP Hackler Flynn & Associates, APC RSM US LLP Brewer & Tominaga LLP Myers Widders Gibson Jones & Feingold LLP McDermott & Bull

5. Lenders, Trustees, Agents, and Other Secured Parties

CRG Financial LLC

¹ This list (and the categories contained herein) are for purposes of a conflicts check and should not be relied upon by any party as a list of creditors or for any other purpose.

BMO Bank N.A. Mitsubishi HC Capital America Global Finance Group, Inc. Ford Motor Credit Company Dell Financial Services LLC Leaf Capital Funding, LLC CDS (Complete Document Solutions) USbank (IOTEC)

6. <u>Banks</u>

BMO Bank N.A. Bank of America N.A.

7. <u>Current and Former Directors and Officers</u>

Eric Ellis Steve Finley Michael Zawalski General Merrill McPeak Derek Eve Leland Jones Tim Mickael John Weyers Theresa Johnson

8. <u>Equity Holders</u>

Endeavour Capital Fund VIII, L.P. Tim Mickael Endeavour Executive Fund VIII, L.P. NS Honeymoon Trust Grande Kinder Trust Michael Zawalski General Merrill McPeak Sevak Piry Jill Winkler John Weyers

9. <u>Landlords</u>

Rexford Industrial – 27712 Avenue Mentry, LLC Rexford Industrial – 27756 Avenue Mentry, LLC

10. Vendors & Contract Counterparties

194 Consulting Solutions 3M Technical Ceramics Inc. A & M Welding Inc. A&S Metal Recycling, Inc A Tech Authority Inc. A&A Aerospace Inc. A.M. Castle and Company West A.N. Deringer Inc. AA Mar AAA Plating & Inspection Inc. Abrasive Finishing Company Accupost Corporation ACE Clearwater Enterprises Inc. Ace Paper Acromil Corporation ACT Aerospace ActiveCyber Active Fasteners & Supply Inc. Adept Fasteners Adobe Creative Advanced Technology Company Inc. Aero Chip Inc. Aero Technology Company Aerocraft Heat Treating Company Inc. Aerodyne Alloys LLC Aerospace Multi-Axis Machining Aerospace Process Distribution Aerospace Technology Aerotech Precision Machining Air Components Inc. Aircraft Crating Inc. Aircraft X-Ray Laboratories Inc. Airgas, Inc. Alatec, Inc. Alco Service and Supply Company Arconic Corporation All Metals Processing Inc. All Power Manufacturing Inc. All Valley Hose & Industrial Supply All World Machinery Supply Alloy Machining Services, Inc. Alloy Processing Inc. AllTech Precision Manufacturing

Alta Foodcraft Refreshment Service Altemp Alloys LLC Aluminum Precision Products Inc. Amamco Tool Amazon.com American Abrasive & Tool Inc. American Aerospace Material Inc. American Aircraft Products, Inc. American Fiber & Finishing, Inc. American Gear Manufacturing Company American Handforge American Lift & Equipment Inc. American Rotary Tools Company AMI Metals Inc. Amtek LLC Angeles Steel Services Anodyne Inc. Applied Tool and Supply Inc. Arconic Corporation Arlington International Aviation Products Arro-Jet Engineering & Consulting Arrow Thompson Metals Inc. Arrowhead Engineering ASK Corporation Aspen Management Company Associated Concrete Products Inc. Associates Leasing Inc. Astro Aluminum Treating Company Inc. Astro Cut Engineering Astromatic Inc. Atlantic Mutual Company Atlas Testing Laboratories Inc. Aurora Bearing Company Aurora Casting and Engineering Inc. Automatic Data Processing Inc. Avibank Manufacturing Inc. Barnes Aerospace Inc. Bellis Steel Company Inc. **BJG Electronics Inc.** Bluestreak Aerospace Bodycote plc Bonelli's Sandblasting Borrmann Metal Center Bourdelais Grinding Company Inc. Bowman Plating Company Inc. BRALCO Metals, Inc.

BrightView Landscape Services Inc. Burbank Steel Treating Inc. Busby Metals Inc. Butler Compressor & Spray Equipment Co. C3 Complete C A C Deburring Corporation CBT Nuggets, LLC C&G Enterprise C&H Hydraulics Inc. CAD Manufacturing Inc. California Broach Company California Cooling & Consulting LLC California Drop Forge Inc. California Hobby Distributors California-Sierra Transformer Inc. California Technical Machining Canyon Crane Service Carlton Forge Works Inc. Carr Lane Manufacturing Company Cascade Industrial Services Corporation CBC Cleaning and Construction Inc. CCC Steel Inc. CDW Computer Centers Inc. Cena & Sons Manufacturing Company Century Machinery Company Inc. CERTEX USA Certified Steel Treating Corporation City Plating and Metal Finishing LLC Clark & Wheeler Engineering Click Bond Inc. **CNC** Signs CNC Surgeon Inc. Coast Plating Inc. Coastal Video Communications Corporation College of the Canyons Employee Training Institute Command Tooling Systems **Complete Document Solutions** Compmedix LLC Computerized R&D Connell Processing Inc. Continental Forge Company Continental Heat Treating Inc. COR Aircraft Supply Cortez Industrial CNC Repair Craftech Metal Forming Inc. Craig Numerical Control Programming **Creative Solutions**

Creform Corporation Crown Lift Trucks Custom Manufacturing Services, Inc. **Custom Metal Fabrication** Cybercut Precision Machining Cygnus Inc. D.A. Stuart Co. Dasco Engineering Corporation Daymark Ltd. Decisive Testing Inc. **Delafield** Corporation Dell Technologies Inc. Deltek, Inc Denson Sales Co. Dieform LLC **Digital Services Company** Dillon Aircraft Deburring Inc. Dillon-Quality Plus Inc. Dion & Sons Inc. DiscountShopTowels.com Dixie Aerospace Inc. **DLX** Company Docusign Inc. DOX Calibration Inc. DreamHost Duhig & Company Inc. Durkee Testing Laboratories Inc. Eagle Cutting & Supply LLC Eagle Eye Calibration Labs Inc. Earle M. Jorgensen Company Eci Software Solutions Inc. Ecolab Inc. Edwards Lapping Company **Element Materials Technology** Embee Processing LLC EME Inc. **Engineered** Ceramics EnMark & Associates Ltd. Enterprise Holdings Inc. Environmental HELP Inc. **EOF** Furniture Works ETA Global Inc. EVJ Machine LLC Evoqua Water Technologies Corporation Excel Aerospace Supply Inc. Exostar LLC Expo Propane

Falcon Manufacturing Corporation Farrar Aerospace LLC Fatigue Technology Inc. Federal Express Corporation Ferro Union Company FGL Environmental Inc. Fine Quality Metal Finishing Inc. First Aid Direct of L.A. Inc. First Care Occupational Medical Group First Choice Machinery Service Inc. Fisher Scientific International Inc. Fives Machining Systems Inc. Flexi-Liner Corporation Fluid Tech Hydraulic Services FLW Inc. Fontal Controls Inc. Fortinet Inc Freshworks Inc Fry Steel Company Inc. **FTI Services** FUCHS Lubricants Co. G & G Machinery G & M Grinding G Target Manufacturing Group Inc. GBM Sales Gerhardt Gear Company Inc. GKN Aerospace Services Ltd. Global Crating Inc. GoDaddy Inc Golden West Security Inc. Goldenwest Manufacturing Inc. Gosiger Inc. GoToMyPC GracoRoberts GreatAmerica Financials Services Greatglass LLC GROB Systems Inc. **GSR** Technical Sales Guhring Inc. GW Richardson Heating & Air Conditioning Inc. H2O Fire Protection Inc. Hadco Metal Trading Company LLC Hames Machine Products Harvey Titanium Rolled Prod. Helen Rose Studio Hexagon AB Hexagon Metrology

High Performance Alloys Inc. High Temp Metals Highland Plating Company Inc. HITCO Carbon Composites Inc. Hixson Metal Finishing Home Depot Credit Services Howmet Global Fastening Systems Inc. HRM Machine Inc. Hydro-Jet Abrasive Machining Hydromach Inc. Hyrize LLC Hy-Speed Machining Inc. IAPMO Research And Testing Inc. Imagine That Inceptra LLC Independent Measurements Industrial Steel Treating Company Industrial Technical Services Inc. Infinity Precision Inc Information Professionals Association Ingersoll Cutting Tool Company Innovative Machining LLC InspectionXpert Corporation Instrumart Insurance Company of the West Integral Parts Machining Company Integral Products Inc. International Computer and Communications Inc. Intrinsic Marks International LLC J.G. Hot Heading Fasteners Jack X Change Jamaica Bearings Company Inc. Jamar Packaging Inc. Jarecc Company Inc. Jarnagan & Son JD2 Inc. Jetroc Engineering JJ's Hone Shop JNC Josett Heating & Cooling John Montilepre Ent. John Murray Plumbing Johns Manville Johnson Controls Security Jorgensen Forge Corporation Kamatics Corporation Kennametal Inc. Kennedy Manufacturing Company

Kilsby Roberts Company Kinnen Supply Kirkhill Inc. Kluber Lubricatons N.A. Knight Industrial Supply Inc. Kropp Forge Kubo L & H Engineering L & M Precision Inc. Laird Technologies Inc. Laminated Shim Company Inc. Lamsco West Inc. Landsberg Orora Lanic Aerospace Larry A. Burkley Laser Label Technologies Laser Measurement Services Inc. Laser Options Inc. Lasers Inc. Laurel Sheet Metal Products Inc. Lawrence Patterson Lawrence Ripak Company Lean Manufacturing Group LLC LeFiell Manufacturing Co LensCrafters Leon Mendoza Trucking LHB Industries Inc. Lindberg Corporation Linde Gas & Equipment Lopez Burr-Bench Lou Harris Industrial Tools Luminescent Systems Inc. M & C Manufacturing Company M & E Precision Machining Company M&M Fasteners Supply Inc. M.F. Services Inc. Mac Tools Madden Machine Works Magnaplate Maintech Inc. Maintenance Technologies Inc. Marking Methods Inc. Marpla Engineering Marshall Tool & Supply Inc. Martinelli's Office Machines Master Research & Manufacturing Inc.

Max Industries Inc. Mayday Manufacturing Company Inc. Mclaughlin Industrial Distributors Inc. McMaster-Carr Supply Company Inc. Medina's Blanchard & Double Disc Grinding LLC Melkes Machine Inc. Merchants Centralized Merco Manufacturing Company Mercury General Corporation Mesco Modern Engineered Services Metal Cutting Service Metal Improvement Company, LLC Metal Surfaces Inc. MetalCenter Inc. Metals Aerospace International Micro Quality Calibration, LLC Mid-State Aerospace Inc. Mike's Tire Man Inc. MilCom Aerostructures LLC Miracle Tools America LLC MISTRAS Group Inc. Mitchell Laboratories Inc. Monlan Group Morrell's Electro Plating Inc. Mosier Fluid Power Motion Industries Inc. MS Inserts & Fasteners Corporation MSC Industrial Supply Company Inc. Mulgrew Aircraft Components Inc. Multax Systems Inc. Myersville Machine & Rigging Company Nasa Ames Research Center National Technical Systems NC Dynamics Inc. NDT Metrics Inc. NDT Systems Inc. Net-Inspect New Hampshire Ball Bearings Inc. NobleTek LLC NS Manufacturing NSK Corporation Nu-Tech Industrial Sales Inc. On the Road Again Ong Group LLC Orange County Broaching Inc. **Orange County Industrial Plastics** Orange County Materials Test Laboratory

Orange Hydraulics Inc. Orbital Sciences Corporation Ortiz Tool LLC Pacific Aerodyne Pacific Oil Company Packaging Systems Inc. Paragon Metals LLC Parisi Services Inc. Particle Reduction Service Patriot Sensors & Control Corporation **Paylocity Corporation PB** Fasteners PBB USA Inc. PCC Structurals Inc. **Pervan Industries** Petersen Inc. Pierce Spafford Metals Company **Pillar Precision** Pioneer Broach Company Pitt Auto Electric Company Plasma Technology Inc. Plas-Tech Resources Inc. PlastiFab Inc Pollution Control Specialists Poly-Metal Finishing Inc. Polyrock Equipment Company Inc. **Ponam Precision Gages** PPG Industries Inc. Prairie Ceramics Corporation PRC - Desoto International Inc. Precision Aerospace Corporation Precision Deburring Enterprises Inc. Precision Instrument Correction Inc. Premco Forge Inc. Premier Printer Maintenance Pride Plating Inc. **Pro Coatings** Process Fab Inc. **Professional Plastics** Professional Quality Non-Destructive Test **Programming Specialties** Progressive Alloy Steels Unlimited Protocast JLC Prudential Overall Supply **PTSolutions** QMI Inc.

Quadient Finance USA Inc. Quadrant Automated Services Inc. Quality Aluminum Forge LLC Quality Control Company Quality Forming Inc. Quality Tech Manufacturing Inc. Quality Turning Inc. Quantum Enterprises Quill Corporation R.S. Hughes Company Inc. RAH Industries Inc. RAND North America **RBC** Bearings Inc. ReadyRefresh Reliance Steel & Aluminum Company Richmond Aircraft Products Inc. Rickard Matals Inc. **RJ's Work Boots LLC RMI** Titanium Company LLC RMK Trucking LLC **Rockwell International Corporation** Rohr Inc. Ron Partain Company Royal Wholesale Electric **RS** Americas Inc. RTI Advanced Forming Inc. Rubatex Corporation Rubbercraft Company Rutland Tool & Supply Company **RVP** Industries S.L. Fusco Inc. Safety-Kleen Inc. Sage IT Inc Sager Electronics Supply Company Sahar Laser & Welding Inc. Salomon Mena Samuel Airport Metals Santa Clarita Bearing Company Saratech Scepko Tube Swaging & Machining Schaeffer Manufacturing Company Schienke Products Inc. Scicon Technologies Seal Science Inc. Selco Products Company Inc. Service Steel Aerospace Corporation Servo Products Company

SeyTec Inc. Shaw Precision Grinding Shelton Industrial Pattern Inc. Shercon Inc. Shop Floor Automations Inc. Shultz Steel Company Sid Street Siemens Corporation Sierra Alloys Company Sierra Pacific Supply Company Inc. Simi Tool Repairs SMBC MANUBANK SNK America Inc. SoCal Pump and Vacuum Solar Atmospheres of San Diego Sonic Testing & Engineering SonicWall, Inc Southwest United Industries Spacetron Titanium Chambers Inc. Spectraforms Standard Diamond Inc. Steel Services Company Stellex Bandy Machining Inc. Stretch Forming Corporation Stroud Systems Inc. Sumikin Bussan Aerospace Metals Summer Systems Heating & Air Conditioning Summers Press Sunshine Metals Inc. Sunvair Aerospace Group Superior Engineering Superior Metal Stripping Company Swiss Precision Instruments T&S NC Programming Service Tail Light LLC Take Care Health Plan TechMet Carbides Inc. Tecnara Tooling Systems Inc. Temptrak Personnel Agency Terry French Landscaping Textron Financial Corporation The Dyer Company The E. Jordan Brookes Co. Inc. The Fitting Source Inc. The Hartford The Machine Group Thomas Triffet Inc.

thyssenkrupp Materials Services GmbH Timet Tiodize Company Inc. Titanium Distribution Services Inc. Titanium Industries Inc. Titanium Services Inc. Titanium Specialties Inc. TMX Aerospace Tooling & Equipment Inc. Toyo Carriers Manufacturing Company Ltd. Toyota Commercial Finance **Toyota Material Handling Solutions** Tradco Inc. Trans World Alloys Company Trans-Pacific Aerospace Company Inc. Trident Company **Triplett** Corporation Triumph Group Tube Service Company Inc. Tuffer Manufacturing Company TW Metals Inc. Twinstar Machining U.S. Bank Equipment Finance Udash Inc. Uline Inc. UMM Electronics Inc. Unified Manufacturing Inc. UnifyHR LLC Union Aircraft Company Inc. unipoint Software Inc. United Imaging Inc. United Technologies Hamilton Standard Unity Engineering Inc. Universal Alloy Corporation Universal Metals US Equipment Industrial Vac-Hyd Los Angeles Valence Surface Technologies Valencia Gundrill Valencia Welding Company Valenite Inc. Valley Engravers Valley Seal Company Vega Manufacturing Group Inc. Vericut (CGTech) Verified Processing Verisurf Software, Inc.

Versaform Corporation Vibra Finish Company USA Vibra-Sonic Deburring Vi-Cal Metals VMware LLC W L Gore & Associates Inc. W. W. Grainger Inc. W.S. Wilson Corporation Walker Brothers Machinery Moving Inc. Walter Grinders Inc. Walter USA Inc. Wave Communications Inc. Waygate Technologies USA LP Weber Metals Inc. Webroot Inc. Weldology Wesco Aircraft Hardware Corporation Western Aeromedical Consortium Western American Western Gage Corporation Westlake Grinding Service Westmoreland Mechanical Testing & Research Inc. WEX Bank Wind Craft Manufacturing Wire Cut Company Inc. World Wide Honing Inc. Wright's Supply Inc. W.S.Dodge Oil Company Inc.

11. Top 30 Unsecured Creditors

AMI Metals Inc. Fives Machining Systems Inc. Rexford Industrial - 27712 Avenue Mentry, LLC Rexford Industrial - 27756 Avenue Mentry, LLC Ernst & Young US LLP Metal Improvement Company, LLC Barnes Aerospace Inc. G Target Manufacturing Group Inc. **PTSolutions** Morrell's Electro Plating Inc. Walker Brothers Machinery Moving Inc. Amtek LLC Astro Aluminum Treating Company Inc. Lean Manufacturing Group LLC NobleTek LLC Valence Surface Technologies

Arlington International Aviation Products Unified Manufacturing Inc. Lockheed Martin Aeronautics Company Carr Lane Manufacturing Company Cygnus Inc. American Fidelity Assurance Company Adept Fasteners Bowman Plating Company Inc. A&A Aerospace Inc. Aircraft Crating Inc. RMI Titanium Company LLC California Cooling & Consulting LLC Hackler Flynn & Associates, APC Ingersoll Cutting Tool Company

12. <u>Taxing/Regulatory Authorities</u>

Internal Revenue Service California Franchise Tax Board California Department of Tax and Fee Administration Los Angeles County Public Works California Secretary of State Systems Certification Body Federal Aviation Administration

13. Insurance Providers, Brokers, and Benefits Administrators

Arthur J. Gallagher Risk Management Services LLC Insurance Company of the West Allied World Surplus Lines Insurance Company Federal Insurance Company At-Bay Specialty Insurance Company National Union Fire Insurance Company Hartford Fire Insurance Company UnitedHealth Group American Fidelity Assurance Company Anthem Blue Cross Blue ShieldChubb Group of Insurance Company

14. <u>Major Customers</u>

Lockheed Martin Aeronautics Company Northrop Grumman Corporation Blue Origin Enterprises Space Exploration Technologies Corp. Spirit AeroSystems, Inc. The Boeing Company Mammoth Freighters LLC

15. <u>Stalking Horse Purchaser and Professionals</u>

FMI Holdco LLC Avem Partners Troutman Pepper Locke LLP

16. <u>Utility Providers</u>

AT&T Inc. Santa Clarita Valley Water Southern California Gas Company Southern California Edison Waste Management Inc. Inatel Communications Inc.

17. U.S. Trustee Personnel, Judges and Staff for the District of Delaware

John T. Dorsey Craig T. Goldblatt Thomas M. Horan Karen B. Owens Brendan L. Shannon Laurie Selber Silverstein J. Kate Stickles Mary F. Walrath Andrew R. Vara Benjamin Hackman Christine Green Denis Cooke Diane Giordano Dion Wynn Edith A. Serrano Hannah M. McCollum Holly Dice James R. O'Malley Jane Leamy Joseph Cudia Joseph McMahon Juliet Sarkessian Lauren Attix Linda Casey

Linda Richenderfer Michael Panacio Nyanquoi Jones Ramona Harris Richard Schepacarter Rosa Sierra-Fox Shakima L. Dortch Timothy J. Fox, Jr.