

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)

Objection Deadline: June 3, 2025 at 4:00 p.m. (ET)

**SECOND MONTHLY APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP,
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL
TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD
FROM APRIL 1, 2025 THROUGH AND INCLUDING APRIL 30, 2025**

Name of Applicant:

Chipman Brown Cicero & Cole, LLP

Authorized to Provide Professional Services to:

Debtors and Debtors in Possession, Effective as of
February 26, 2025

*Period for Which Compensation and Reimbursement is
Sought:*

April 1, 2025, through April 30, 2025

*Amount of Compensation Sought as Actual,
Reasonable and Necessary:*

\$76,572.50 (80% = \$61,258.00)

*Amount of Expense Reimbursement Sought as Actual,
Reasonable and Necessary:*

\$1,573.76

This is a(n) _____ Interim ☒ Monthly _____ Final Fee Application.

Prior Applications: None.

The total time expended in connection with the preparation of this fee application is not included herein as such time was expended after the Application Period. Through this fee application, CBCC does seek reimbursement for 9.3 hours, with a value of \$4,615.00, in connection with the preparation of the fee application for February/March 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.



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Prior Applications:

		REQUESTED		APPROVED	
DATE FILED	PERIOD COVERED	FEEs	EXPENSES	FEEs	EXPENSES
4/15/2025 D.I. 207	2/26/2025-3/31/2025	\$203,800.00	\$5,820.62	\$163,040.00	\$5,820.62

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**SECOND MONTHLY APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP,
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TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD
FROM APRIL 1, 2025 THROUGH AND INCLUDING APRIL 30, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), Chipman Brown Cicero & Cole, LLP (“**CBCC**”), counsel to the debtors and debtors in possession (the “**Debtors**”), hereby submits its second monthly application (the “**Application**”) for compensation and reimbursement of expenses for the period from April 1, 2025 through and including April 30, 2025 (the “**Application Period**”). By this Application, CBCC seeks a monthly interim allowance of compensation in the amount of \$76,572.50 and actual expenses in the amount of \$1,573.76, for an aggregate total of \$78,146.26 in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 132] entered March 20, 2025 (the “**Interim Compensation Order**”). CBCC hereby seeks payment of \$61,258.00

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(80% of the requested fees) and reimbursement of \$1,573.76 (100% of requested expenses), for an aggregate total payment of \$62,831.76 for the Application Period upon the filing of a certificate of no objection. In support thereof, CBCC respectfully represents as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over the Debtors, their estates, and this matter under 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. This is a core proceeding under 28 U.S.C. § 157(b).

2. Venue of this proceeding and this Application is proper in this district pursuant to 28 U.S.C. § 1408.

3. Pursuant to Local Rule 9013-1(f), CBCC consents to the entry of a final order by the Court in connection with this Application, to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

BACKGROUND

A. GENERAL BACKGROUND.

5. On February 26, 2025 (the “**Petition Date**”), the Debtors commenced these cases (the “**Chapter 11 Cases**”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

6. The Debtors are authorized to continue operating their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

7. No committee has been appointed in the Chapter 11 Cases. No trustee or examiner has been appointed in these Chapter 11 Cases.

8. On March 20, 2025, the Court entered the Interim Compensation Order, authorizing certain professionals (“**Professionals**”) to submit monthly applications for compensation and reimbursement for expenses pursuant to the procedures specified therein. If no objections are made within twenty-one (21) days after service of the monthly fee application, the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses.

B. THE RETENTION OF CHIPMAN BROWN CICERO & COLE, LLP.

9. On March 4, 2025, the Debtors filed the *Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP, as Co-Counsel to the Debtors Effective as of the Petition Date* [Docket No. 73] (the “**Retention Application**”).

10. On March 21, 2025, the Court entered the *Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP, as Co-Counsel to the Debtors Effective as of the Petition Date* [Docket No. 153] (the “**Retention Order**”).

RELIEF REQUESTED

11. Subject to Court approval, CBCC seeks payment for compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by CBCC during the Application Period. With the exception of copy charges (which are charged at a lower rate), the rates charged

by CBCC in these Chapter 11 Cases do not differ from the rates charged to CBCC's non-bankruptcy clients.

12. This Application is the second monthly fee application filed by CBCC in these Chapter 11 Cases. In connection with the professional services described below, by this Application CBCC seeks allowance of compensation in the amount of \$76,572.50 and reimbursement of actual and necessary expenses in the amount of \$1,573.76 for the Application Period.

A. COMPENSATION REQUESTED.

13. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Debtor during the Application Period, the regular customary billing rates and the total value of time incurred by each of the CBCC attorneys rendering services to the Debtor is attached hereto as **Exhibit A**.

14. A copy of the computer-generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the "**Guidelines**"), is attached hereto as **Exhibit B**.

B. EXPENSE REIMBURSEMENT.

15. CBCC incurred out-of-pocket expenses during the Application Period in the amount of \$1,573.76. A statement of expenses incurred by CBCC during the Application Period is attached as **Exhibit C**. All time entries and requested expenses are in compliance with Rule 2016-1 of the Local Rules.²

² CBCC has also attempted to ensure that this Application complies with the Guidelines. To the extent that the Guidelines conflict with the Local Rules, in particular, Local Rule 2016-1, CBCC has chosen to comply with such Local Rule. CBCC will supplement this Application with additional detail or information upon request.

16. Pursuant to Local Rule 2016-1, CBCC represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Application Period:

- (a) Copy charges and photocopying expenses were \$.10 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage and operation of copy and printer machines, together with a margin for recovery of related expenditures. In addition, CBCC often utilizes outside copier services for high volume projects, and this Application seeks the recovery of those costs, if applicable;
- (b) Incoming facsimiles are not billed;
- (c) Outgoing facsimiles are billed at the rate of \$.25 per page;
- (d) Toll telephone charges are not billed; and
- (e) Computer assisted legal research charges are billed at actual costs.

RESPONSES TO FEE GUIDELINES QUESTIONNAIRE

QUESTION	RESPONSE	EXPLANATION
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No	N/A
If the fees sought in this fee application as compared to the fees budgeted for this time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	Yes	CBCC's fee application for February/March 2025 was reviewed by CBCC during the time period.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	Yes	CBCC's fee application for February/March 2025 was reviewed by CBCC during the time period.

QUESTION	RESPONSE	EXPLANATION
<p>If the fee application includes any rate increases since retention:</p> <p>i. Did your client review and approve those rate increases in advance?</p> <p>ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA formal Ethics Opinion 11-458?</p>	N/A	N/A

LEGAL STANDARD

17. Section 330(a)(1) of the Bankruptcy Code allows the payment of:

(A) Reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) Reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1). Reasonableness of compensation is driven by the “market-driven approach” which considers the nature, extent and value of services provided by the professional and cost of comparable services in the non-bankruptcy contexts. *See Zolfo Cooper & Co. v. Sunbeam-Oster Co.*, 50 F.3d 253, 258 (3d Cir. 1995); *In re Busy Beaver Building Ctr., Inc.*, 19 F.3d 833, 849 (3d Cir. 1994). Thus, the “baseline rule is for firms to receive their customary rates.” *Zolfo Cooper*, 50 F.3d at 259.

18. In accordance with its practices in non-bankruptcy matters, CBCC has calculated its compensation requested in this Application by applying its standard hourly rates. CBCC’s calculation is based upon hourly rates that are well within the range of rates that are charged by comparable firms in similar bankruptcy cases. Accordingly, CBCC’s rates should be determined to be reasonable under section 330 of the Bankruptcy Code.

19. CBCC’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the

complexity, accelerated deadlines, and size of the Debtors' Chapter 11 Cases. CBCC's fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, CBCC's fees are reasonable pursuant to section 330 of the Bankruptcy Code.

20. Section 330(a)(1)(B) of the Bankruptcy Code permits reimbursement for actual, necessary expenses. CBCC's legal services and expenses incurred during the Application Period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Debtors' estates. CBCC properly requested reimbursement of only actual, necessary and appropriate legal expenses.

21. Except as permitted by Bankruptcy Rule 2016, no agreement or understanding exists between CBCC and/or any third person for the sharing or division of compensation. All of the services for which compensation is requested in this Application were rendered at the request of and solely on behalf of the Debtors.

22. Pursuant to the standards set forth in sections 330 and 331 of the Bankruptcy Code, CBCC submits that the compensation requested is for actual and necessary services and expenses, and is reasonable, based upon the nature, extent and value of such services, the time spent thereon, and the costs of comparable services in a case under the Bankruptcy Code.

23. The time records annexed to this Application constitute only a general statement of the services rendered and time expended without description of the pressure and constraints under which CBCC actually rendered these services. The considerable challenges of this case have been attended to and managed by CBCC at all levels, promptly, expertly, and often to the exclusion of the other matters in CBCC's office. CBCC submits, therefore, that its fees and expenses were actual, necessary, reasonable, and justified, and should be allowed in full.

RESERVATION OF RIGHTS

24. To the extent time or disbursement charges for services rendered or disbursements incurred relate to the Application Period but were not processed prior to the preparation of this Application, or CBCC has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Application Period, CBCC reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

CERTIFICATE OF COMPLIANCE AND WAIVER

25. The undersigned representative of CBCC certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, CBCC believes that such deviations are not material and respectfully requests that any such requirements be waived.

CONCLUSION

WHEREFORE, CBCC respectfully requests (a) that it be allowed compensation in the amount of \$76,572.50 for professional services rendered (80% or \$61,258.00 of which is to be paid upon the filing of a certificate of no objection), and reimbursement of expenses in the amount of \$1,573.76 (100% of which is to be paid upon the filing of a certificate of no objection) for the Application Period; and (b) that the Court authorize and direct the Debtors to pay CBCC the amounts due and owing hereunder in accordance with the Interim Compensation Order.

Dated: May 13, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

Robert A. Weber (No. 4013)

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

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weber@chipmanbrown.com

desgross@chipmanbrown.com

-and-

CHIPMAN BROWN CICERO & COLE, LLP

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

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New York, New York 10017

Telephone: (646) 741-5529

egan@chipmanbrown.com

Co-Counsel to the Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:

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

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

VERIFICATION

STATE OF DELAWARE)
) SS
COUNTY OF NEW CASTLE)

I, Mark L. Desgrosseilliers, being duly sworn according to law, deposes and says:

1. I am a partner in the law firm of Chipman Brown Cicero & Cole, LLP, counsel to Dynamic Aerostructures LLC and its affiliated Debtors.

2. I have read the foregoing Application of Chipman Brown Cicero & Cole, LLP for allowance of compensation and reimbursement of expenses and know the contents thereof, and the same are correct to the best of my knowledge, information and belief.

3. I have reviewed the requirements of Local Rule 2016-1 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief this Application complies with Local Rule 2016-1.

Dated: May 13, 2025

/s/ Mark L. Desgrosseilliers
Mark L. Desgrosseilliers (No. 4083)

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EXHIBIT A**COMPENSATION BY PROFESSIONAL FOR THE PERIOD
APRIL 1, 2025 THROUGH AND INCLUDING APRIL 30, 2025**

NAME OF PROFESSIONAL INDIVIDUAL	POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Robert A. Weber	Partner; Member of the Delaware Bar since 2000	\$875	2.4	\$2,100.00
Mark L. Desgrosseilliers	Partner; Member of the Delaware Bar since 2001	\$850	15.6	\$13,260.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$750	66.5	\$49,875.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$375	3.7	\$1,387.50
Aaron Bach	Associate; Member of the Delaware Bar since 2024	\$400	3.8	\$1,520.00
Alison Maser	Associate; Member of the Delaware Bar since 2024	\$400	3.4	\$1,360.00
Renae M. Fusco	Paralegal	\$350	20.2	\$7,070.00
TOTAL:			115.6	\$76,572.50
ATTORNEY COMPENSATION:				\$69,502.50
TOTAL ATTORNEY HOURS:			95.4	
BLENDED HOURLY RATE OF ALL TIMEKEEPERS:				\$662.40

EXHIBIT B**COMPENSATION BY PROJECT CATEGORY**

PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
B110 Case Administration	9.1	\$4,965.00
B120 Asset Analysis and Recovery	0.0	\$0.00
B130 Asset Disposition	46.0	\$33,300.00
B140 Relief from Stay/Adequate Protection Proceeding	0.0	\$0.00
B150 Meetings of and Communications with Creditors	3.1	\$2,325.00
B160 Fee/Employment Applications	21.9	\$11,595.00
B170 Fee/Employment Objections	0.0	\$0.00
B180 Avoidance Action Analysis	0.0	\$0.00
B185 Assumption/Rejection of Leases and Contracts	.2	\$170.00
B190 Other Contested Matters (excluding assumption/rejection motions)	14.0	\$9,010.00
B195 Non-Working Travel (billed at ½ rate)	3.7	\$1,387.50
B200 Operations	0.0	\$0.00
B210 Business Operations	11.5	\$8,865.00
B220 Employee Benefits/Pension	0.0	\$0.00
B230 Financing/Cash Collateral	2.0	\$1,580.00
B240 Tax Issues	0.0	\$0.00
B250 Real Estate	0.0	\$0.00
B260 Board of Director Matters	4.1	\$3,375.00
B300 Claims and Plan	0.0	\$0.00
B310 Claims Administration and Objections	0.0	\$0.00
B320 Plan and Disclosure Statement (including business plan)	0.0	\$0.00
B400 Bankruptcy-Related Advice	0.0	\$0.00
B410 General Bankruptcy Advice/Opinions	0.0	\$0.00
B420 Restructurings	0.0	\$0.00
TOTAL:	115.6	\$76,572.50

Date	User	Activity	Description	Hours	Rate	Total
4/1/2025	Daniel Egan	B110 Case Administration	review and comment on OCP declarations	0.30	\$750.00	\$225.00
4/1/2025	Mark Desgrosseilliers	B110 Case Administration	Continue to prepare for 341 meeting (.6); attend same (.7); follow-up concerning same (.1)	1.40	\$850.00	\$1,190.00
4/1/2025	Renae Fusco	B110 Case Administration	efile Environmental Law OCP declaration (.2); coordinate service of same (.1)	0.30	\$350.00	\$105.00
4/2/2025	Daniel Egan	B110 Case Administration	review and comment on agenda	0.20	\$750.00	\$150.00
4/2/2025	Mark Desgrosseilliers	B110 Case Administration	Review agenda (.1); prepare for hearing (.1)	0.20	\$850.00	\$170.00
4/2/2025	Renae Fusco	B110 Case Administration	draft 4/7 agenda	0.90	\$350.00	\$315.00
4/3/2025	Daniel Egan	B110 Case Administration	review and comment on revised agenda	0.20	\$750.00	\$150.00
4/3/2025	Renae Fusco	B110 Case Administration	edit agenda (.2); efile same (.1); coordinate service of same (.1); coordinate prep of hearing binders (.3)	0.70	\$350.00	\$245.00
4/4/2025	Mark Desgrosseilliers	B110 Case Administration	Review notice of agenda	0.60	\$850.00	\$510.00
4/4/2025	Renae Fusco	B110 Case Administration	draft amended agenda	0.20	\$350.00	\$70.00
4/8/2025	Renae Fusco	B110 Case Administration	circulate 4/7 transcript	0.20	\$350.00	\$70.00
4/11/2025	Aaron Bach	B110 Case Administration	Draft motion to dismiss chapter 11 cases in FMI.	0.90	\$400.00	\$360.00
4/11/2025	Daniel Egan	B110 Case Administration	review and comment on OCP declaration	0.20	\$750.00	\$150.00
4/11/2025	Renae Fusco	B110 Case Administration	correspondence with J. Carroll regarding parties in interest list	0.20	\$350.00	\$70.00
4/14/2025	Renae Fusco	B110 Case Administration	efile Hedman OCP declaration (.1); coordinate service of same (.1)	0.20	\$350.00	\$70.00
4/15/2025	Aaron Bach	B110 Case Administration	Draft/revise motion to dismiss for Dynamic/FMI.	0.70	\$400.00	\$280.00
4/15/2025	Daniel Egan	B110 Case Administration	review and comment on Hackler declaration	0.20	\$750.00	\$150.00
4/15/2025	Renae Fusco	B110 Case Administration	efile Orrick OCP declaration (.2); coordinate service of same (.1); efile Hackler OCP declaration (.2)	0.50	\$350.00	\$175.00
4/25/2025	Renae Fusco	B110 Case Administration	correspondence with D. Egan re hearing dates	0.10	\$350.00	\$35.00
4/28/2025	Daniel Egan	B110 Case Administration	correspondence with R. Fusco and Ropes regarding hearing	0.20	\$750.00	\$150.00
4/29/2025	Daniel Egan	B110 Case Administration	review and comment on omnibus hearing notice (.1); correspondence with advisors regarding hearing (.1)	0.20	\$750.00	\$150.00
4/29/2025	Renae Fusco	B110 Case Administration	draft COC re omni hearing date (.1); efile same and upload order (.2)	0.30	\$350.00	\$105.00
4/30/2025	Renae Fusco	B110 Case Administration	coordinate service of omni hearing order (.1); calendar dates (.1)	0.20	\$350.00	\$70.00
			B110 Case Administration	9.10		\$4,965.00
4/1/2025	Daniel Egan	B130 Asset Disposition	draft officer's certificate for sale (.2); correspondence with buyer regarding APA issues (.4); various correspondence with Configure and client regarding bidding process (.6)	1.20	\$750.00	\$900.00
4/1/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for sale hearing	0.20	\$850.00	\$170.00
4/1/2025	Renae Fusco	B130 Asset Disposition	emails w M Desgrosseilliers D Egan re auction	0.20	\$350.00	\$70.00
4/2/2025	Daniel Egan	B130 Asset Disposition	draft notice of successful bidder (.3); correspondence with Verita regarding sale publication and service (.2); correspondence with client Configure and buyer regarding sale and bid deadline (.4); prepare closing materials (.6); research sale issue (.9)	2.40	\$750.00	\$1,800.00
4/2/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review notice of cancellation of auction (.1); prepare for sale hearing (.2)	0.30	\$850.00	\$255.00
4/2/2025	Renae Fusco	B130 Asset Disposition	efile cancellation of auction & notice of successful bidder (.1); coordinate service of same (.1)	0.20	\$350.00	\$70.00
4/3/2025	Daniel Egan	B130 Asset Disposition	correspondence with creditors regarding sale issues (.6); various correspondence with client and buyer regarding sale hearing (.5); revise sale order (.4); various correspondence with parties in interest regarding same (.3)	1.80	\$750.00	\$1,350.00
4/3/2025	Mark Desgrosseilliers	B130 Asset Disposition	Continue to prepare for sale hearing	0.60	\$850.00	\$510.00
4/3/2025	Robert Weber	B130 Asset Disposition	communications with M. Desgrosseilliers D. Egan R. Fusco regarding sale hearing and related matters (.6); review agenda (.1); review communications with NG counsel regarding redacted document (.1)	0.80	\$875.00	\$700.00

4/4/2025	Daniel Egan	B130 Asset Disposition	call with buyer regarding sale (.3); further review and revise sale order and schedules (.7); continue preparing closing materials (.8); correspondence with client and advisors regarding sale hearing (.2); review and revise notices regarding sale and sale order (.3); multiple calls with creditors regarding sale issues (.9)	3.20	\$750.00	\$2,400.00
4/4/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for sale hearing	0.60	\$850.00	\$510.00
4/4/2025	Renae Fusco	B130 Asset Disposition	draft NOF revised APA schedules (.3); draft NOF revised sale order (.4)	0.70	\$350.00	\$245.00
4/6/2025	Daniel Egan	B130 Asset Disposition	prepare for sale hearing (.7); call with creditor regarding same (.2); correspondence with client regarding same (.3)	1.20	\$750.00	\$900.00
4/6/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for sale hearing	0.20	\$850.00	\$170.00
4/7/2025	Alison Maser	B130 Asset Disposition	Attended sale hearing.	1.40	\$400.00	\$560.00
4/7/2025	Daniel Egan	B130 Asset Disposition	multiple calls with creditors and buyer regarding sale issues (.8); prepare for sale hearing (2.4); multiple revisions to sale order and schedules (1.1); attend sale hearing (.7); correspondence with Configure regarding sale issues (.3); correspondence with client and buyer regarding closing issues (.4)	5.70	\$750.00	\$4,275.00
4/7/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review sale hearing related correspondence	0.20	\$850.00	\$170.00
4/7/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for sale hearing	0.70	\$850.00	\$595.00
4/7/2025	Renae Fusco	B130 Asset Disposition	prepare materials for sale hearing	1.40	\$350.00	\$490.00
4/7/2025	Renae Fusco	B130 Asset Disposition	efile NOF re revised sale order	0.30	\$350.00	\$105.00
4/7/2025	Renae Fusco	B130 Asset Disposition	draft COC re sale order (.2); efile same (.1); upload order (.1); circulate sale order (.1)	0.50	\$350.00	\$175.00
4/7/2025	Robert Weber	B130 Asset Disposition	prepare for/attend hearing on sale motion (1.2); meet with client after hearing (.2); communications regarding revised form of order (.2)	1.60	\$875.00	\$1,400.00
4/8/2025	Daniel Egan	B130 Asset Disposition	call with client regarding APA (.2); review APA schedules and closing documents (.8); review funds flow (.1); various correspondence with BRG and client regarding same (.3); correspondence with buyer regarding sale (.3)	1.70	\$750.00	\$1,275.00
4/8/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review sale order (.1); review correspondence regarding post-sale closing matters (.2)	0.30	\$850.00	\$255.00
4/9/2025	Daniel Egan	B130 Asset Disposition	various correspondence with client and BRG regarding sale and closing issues (1.3); various correspondence with lender and buyer regarding same (.9); revise closing documents (.3)	2.50	\$750.00	\$1,875.00
4/9/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review sale proceeds flow of funds	0.10	\$850.00	\$85.00
4/10/2025	Daniel Egan	B130 Asset Disposition	multiple calls with client BRG Configure and buyer regarding sale issues (2.1); review and revise sale closing documents (1.8); draft notice of closing and assigned contracts (.4); review consent decree (.9); various email correspondence with client and buyer regarding same and sale issues (.7)	5.90	\$750.00	\$4,425.00
4/11/2025	Daniel Egan	B130 Asset Disposition	multiple calls with client buyer and advisors regarding sale closing and purchase price (1.6); review and finalize closing documents (1.1); review revised funds flow (.1); review and revise sale closing notice and schedules (.4); various email correspondence with client and buyer regarding sale issues (.6)	3.80	\$750.00	\$2,850.00
4/11/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review sale closing matters and notice of same	0.40	\$850.00	\$340.00
4/11/2025	Renae Fusco	B130 Asset Disposition	efile notice of sale closing; coordinate service of same	0.20	\$350.00	\$70.00
4/16/2025	Daniel Egan	B130 Asset Disposition	review sale documents regarding assumed liabilities and contracts	0.20	\$750.00	\$150.00
4/23/2025	Daniel Egan	B130 Asset Disposition	correspondence with buyer and client regarding sale issues	0.30	\$750.00	\$225.00
4/24/2025	Daniel Egan	B130 Asset Disposition	correspondence with creditor regarding sale and equipment	0.30	\$750.00	\$225.00
4/25/2025	Daniel Egan	B130 Asset Disposition	correspondence with client and purchaser regarding sale issues (.2); review APA regarding same (.3); correspondence with client regarding sale order (.1); review CRO agreement (.3)	0.90	\$750.00	\$675.00
4/25/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review correspondence concerning sale and post-sale potential liabilities	0.30	\$850.00	\$255.00

4/28/2025	Daniel Egan	B130 Asset Disposition	multiple calls with client regarding sale and corporate name (.6); analyze issues regarding same (.3); review APA regarding post-closing issues (.6)	1.50	\$750.00	\$1,125.00
4/29/2025	Daniel Egan	B130 Asset Disposition	consider wind-down and post-sale issues (.7); revise CRO motion (.4)	1.10	\$750.00	\$825.00
4/30/2025	Daniel Egan	B130 Asset Disposition	review CRO agreement (.3); further revise wind-down motion (.5); analyze post-closing issues (.3)	1.10	\$750.00	\$825.00
B130 Asset Disposition				46.00		\$33,300.00
4/1/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	review materials for 341 meeting (.4); attend 341 meeting (.7); calls with creditors regarding case status (.3)	1.40	\$750.00	\$1,050.00
4/2/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	various correspondence with creditors regarding sale and case issues	0.50	\$750.00	\$375.00
4/8/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	calls with creditors regarding case filing and sale	0.50	\$750.00	\$375.00
4/11/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	calls with creditors regarding case inquiries	0.40	\$750.00	\$300.00
4/17/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	correspondence with creditor and former employee regarding sale and contracts	0.30	\$750.00	\$225.00
B150 Meetings of and Communications with Creditors				3.10		\$2,325.00
4/8/2025	Renae Fusco	B160 Fee/Employment Applications	call with D Egan re fee apps	0.20	\$350.00	\$70.00
4/9/2025	Alison Maser	B160 Fee/Employment Applications	Drafting Motion to Retain Winddown Officer.	0.90	\$400.00	\$360.00
4/9/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise fee statement exhibits	1.80	\$750.00	\$1,350.00
4/9/2025	Renae Fusco	B160 Fee/Employment Applications	drafting CBCC 1st fee app	1.50	\$350.00	\$525.00
4/11/2025	Alison Maser	B160 Fee/Employment Applications	Drafting Motion to Retain Winddown Officer.	0.80	\$400.00	\$320.00
4/11/2025	Renae Fusco	B160 Fee/Employment Applications	draft CBCC 1st fee app & related exhibits	3.20	\$350.00	\$1,120.00
4/13/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise CBCC fee statement (.9); correspondence with R. Fusco regarding same (.2)	1.10	\$750.00	\$825.00
4/14/2025	Alison Maser	B160 Fee/Employment Applications	Reviewing engagement letter for motion to retain winddown officer.	0.30	\$400.00	\$120.00
4/14/2025	Daniel Egan	B160 Fee/Employment Applications	revise fee statement (.3); correspondence with client regarding same (.2); review and comment on Configure fee statement (.8)	1.30	\$750.00	\$975.00
4/14/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Jim Carroll engagement letter (.1); review motion and order to retain CRO (.2)	0.30	\$850.00	\$255.00
4/14/2025	Renae Fusco	B160 Fee/Employment Applications	Edit CBCC fee app	0.40	\$350.00	\$140.00
4/15/2025	Daniel Egan	B160 Fee/Employment Applications	further revise fee statements (.4); correspondence with R. Fusco regarding same (.1); correspondence with Configure and R. Fusco regarding revised exhibits (.3)	0.80	\$750.00	\$600.00
4/15/2025	Renae Fusco	B160 Fee/Employment Applications	edit CBCC fee app (.4); efile same (.1); coordinate service of same (.1)	0.60	\$350.00	\$210.00
4/15/2025	Renae Fusco	B160 Fee/Employment Applications	edit Configure 1st fee app (.4); efile same (.2); coordinate service of same (.1); draft NOF re revised Exh B (.4)	1.10	\$350.00	\$385.00
4/16/2025	Daniel Egan	B160 Fee/Employment Applications	review and comment on BRG fee statement (.6); correspondence with BRG regarding same (.2)	0.80	\$750.00	\$600.00
4/16/2025	Renae Fusco	B160 Fee/Employment Applications	review CBCC disclosures	1.40	\$350.00	\$490.00
4/17/2025	Daniel Egan	B160 Fee/Employment Applications	review revised BRG fee statement (.2); review and revise notice for same (.1)	0.30	\$750.00	\$225.00
4/17/2025	Renae Fusco	B160 Fee/Employment Applications	review CBCC disclosures	1.00	\$350.00	\$350.00
4/17/2025	Renae Fusco	B160 Fee/Employment Applications	draft notice re BRG fee app (.2); efile BRG fee app (.1); coordinate service of same (.1)	0.40	\$350.00	\$140.00
4/24/2025	Daniel Egan	B160 Fee/Employment Applications	review and comment on Configure final fee application (1.0); correspondence with Configure and R. Fusco regarding same (.2)	1.20	\$750.00	\$900.00
4/24/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Configure final fee application	0.20	\$850.00	\$170.00
4/25/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review correspondence concerning final fee application for Configure	0.20	\$850.00	\$170.00

4/29/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Configure final fee application and hearing for same	0.40	\$850.00	\$340.00
4/30/2025	Daniel Egan	B160 Fee/Employment Applications	review and comment on revised final fee application (.6); various correspondence with R. Fusco and Configure regarding same (.3)	0.90	\$750.00	\$675.00
4/30/2025	Renae Fusco	B160 Fee/Employment Applications	edit Configure final fee app (.5); efile same (.2); coordinate service (.1)	0.80	\$350.00	\$280.00
			B160 Fee/Employment Applications	21.90		\$11,595.00
4/16/2025	Mark Desgrosseilliers	B185 Assumption/Rejection of Leases and Contracts	Review copier lease issues (.1); respond to creditor inquiry concerning same (.1)	0.20	\$850.00	\$170.00
			B185 Assumption/Rejection of Leases and Contracts	0.20		\$170.00
4/17/2025	Aaron Bach	B190 Other Contested Matters (excluding assumption/rejection motions)	Draft/revise motion to dismiss FMI/Dynamic chapter 11 case.	1.50	\$400.00	\$600.00
4/4/2025	Renae Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	draft NOF re NG 9019 settlement agreement (.4); edit seal order (.3); email to M Desgrosseilliers regarding seal order (.1); draft COC re seal order (.3); efile NOF redacted agreement (.2); coordinate service of NOF (.1); prepare blackline of seal order (.1)	1.50	\$350.00	\$525.00
4/7/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review revised sealing order and redacted settlement agreement (.4); correspondence with M. Desgrosseilliers and R. Fusco regarding same (.3)	0.70	\$750.00	\$525.00
4/7/2025	Renae Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	efile COC re seal motion (.1); upload order and send same to Judge Silverstein chambers (.2)	0.30	\$350.00	\$105.00
4/13/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise OCP declaration	0.20	\$750.00	\$150.00
4/14/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	correspondence with Hedman and R. Fusco regarding OCP declaration (.2); revise winddown motion (1.8); review and comment on Orrick declaration (.2)	2.20	\$750.00	\$1,650.00
4/17/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review draft dismissal motion (.7); research issues regarding same (.6)	1.30	\$750.00	\$975.00
4/18/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and comment on dismissal motion and exhibits	1.40	\$750.00	\$1,050.00
4/21/2025	Aaron Bach	B190 Other Contested Matters (excluding assumption/rejection motions)	Revise motion to dismiss for Dynamic/FMI.	0.70	\$400.00	\$280.00
4/21/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise draft dismissal motion (2.8); analyze issues regarding same (.7)	3.50	\$750.00	\$2,625.00
4/22/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise CRO and dismissal motions	0.70	\$750.00	\$525.00
			B190 Other Contested Matters (excluding assumption/rejection motions)	14.00		\$9,010.00
4/7/2025	Daniel Egan	B195 Non-Working Travel	travel to and from Delaware for sale hearing	3.70	\$375.00	\$1,387.50
			B195 Non-Working Travel (billed at 50% rate)	3.70		\$1,387.50
4/1/2025	Daniel Egan	B210 Business Operations	review consent decree	0.50	\$750.00	\$375.00
4/2/2025	Mark Desgrosseilliers	B210 Business Operations	Review Northrop Grumman seal motion (.1); call with Northrop counsel regarding same (.2); communications with US Trustee regarding same (.1); review Boeing agreement (.2); communications with client concerning same (.1)	0.70	\$850.00	\$595.00
4/3/2025	Daniel Egan	B210 Business Operations	correspondence with buyer and client regarding insurance issues	0.30	\$750.00	\$225.00
4/3/2025	Mark Desgrosseilliers	B210 Business Operations	Call with U.S. Trustee concerning seal motion for Northrop Grumman (.1); communications with counsel to Northrop Grumman regarding same (.1); prepare for hearing regarding same (.7); review Boeing agreement (.3); communications with client regarding same (.1)	1.30	\$850.00	\$1,105.00
4/4/2025	Daniel Egan	B210 Business Operations	review revised customer agreements	0.40	\$750.00	\$300.00

4/4/2025	Mark Desgrosseilliers	B210 Business Operations	Continue to review redactions to Northrop settlement agreement (.4); prepare for hearing regarding seal motion (.3); review Boeing settlement (.4); communications with client concerning same (.2); communications with counsel for Boeing regarding same (.1)	1.40	\$850.00	\$1,190.00
4/5/2025	Mark Desgrosseilliers	B210 Business Operations	Review Boeing settlement (.1); communications with opposing counsel regarding same (.1)	0.20	\$850.00	\$170.00
4/7/2025	Mark Desgrosseilliers	B210 Business Operations	Review order approving Northrop Grumman seal motion and related certification of counsel	0.20	\$850.00	\$170.00
4/7/2025	Mark Desgrosseilliers	B210 Business Operations	Continue to review Northrop settlement redactions and related documents	0.60	\$850.00	\$510.00
4/18/2025	Daniel Egan	B210 Business Operations	correspondence with client and BRG regarding winddown and accounts (.6); correspondence with UST regarding accounts (.1)	0.70	\$750.00	\$525.00
4/21/2025	Daniel Egan	B210 Business Operations	call with client regarding tax issues and administrative expenses	0.40	\$750.00	\$300.00
4/22/2025	Daniel Egan	B210 Business Operations	review and comment on operating reports (.8); various correspondence with BRG regarding same (.5); call with BRG regarding accounts (.2); correspondence with client and BRG regarding administrative expenses (.2)	1.70	\$750.00	\$1,275.00
4/23/2025	Daniel Egan	B210 Business Operations	correspondence with BRG and R. Fusco regarding operating reports (.3); analyze wind-down issues (.3)	0.60	\$750.00	\$450.00
4/23/2025	Renae Fusco	B210 Business Operations	finalize & efile MOR's (.4); coordinate service of same (.1)	0.50	\$350.00	\$175.00
4/24/2025	Daniel Egan	B210 Business Operations	call with BRG regarding winddown issues (.6); call with buyer regarding tax issues (.2); review issues regarding debtor accounts and escrow (.4); correspondence with BRG regarding UST fees and utility adequate assurance (.3)	1.50	\$750.00	\$1,125.00
4/29/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding employment litigation (.1); analyze issues regarding same (.3)	0.40	\$750.00	\$300.00
4/30/2025	Daniel Egan	B210 Business Operations	correspondence with Orrick regarding OCP declaration	0.10	\$750.00	\$75.00
		B210 Business Operations		11.50		\$8,865.00
4/3/2025	Daniel Egan	B230 Financing/Cash Collections	review financing order (.3); correspondence with client regarding same (.1)	0.40	\$750.00	\$300.00
4/4/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with client regarding financing and adequate assurance issues	0.20	\$750.00	\$150.00
4/9/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with lender and client regarding loan issues	0.20	\$750.00	\$150.00
4/9/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review billing by lenders' professionals	0.40	\$850.00	\$340.00
4/15/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with client and lender regarding adequate protection	0.20	\$750.00	\$150.00
4/17/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with BRG regarding escrow	0.20	\$750.00	\$150.00
4/18/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review post-closing matters including bank accounts	0.40	\$850.00	\$340.00
		B230 Financing/Cash Collections		2.00		\$1,580.00
4/8/2025	Daniel Egan	B260 Board of Directors Matters	prepare for board meeting (.6); attend same (.3)	0.90	\$750.00	\$675.00
4/8/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Prepare for Board meeting (.2); attend same (.3)	0.50	\$850.00	\$425.00
4/10/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Review governance issues post-closing	0.60	\$850.00	\$510.00
4/11/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Address CRO retention and transition matters post-sale	0.80	\$850.00	\$680.00
4/28/2025	Daniel Egan	B260 Board of Directors Matters	correspondence with client regarding board meeting	0.20	\$750.00	\$150.00
4/28/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Review retention of CRO and address scheduling of Board meeting for same	1.10	\$850.00	\$935.00
		B260 Board of Directors Matters		4.10		\$3,375.00
		Total Fees		115.60		\$76,572.50

EXHIBIT C**EXPENSE SUMMARY FOR THE PERIOD
APRIL 1, 2025 THROUGH AND INCLUDING APRIL 30, 2025**

EXPENSE CATEGORY	SERVICE PROVIDER (IF APPLICABLE)	TOTAL EXPENSES
E101 Copying	In-House	\$191.00
E102 Outside Printing	Reliable	\$456.06
E107 Delivery services/messengers	DLS	\$49.50
E110 Out of Town Travel	Amtrak	\$346.00
E111 Meals	Purebread Deli	\$133.65
E115 Transcripts	Reliable	\$397.55
TOTAL:		\$1,573.76

Date	User	Activity	Description	Amount	Rate	Total
4/7/2025	Renae Fusco	E101 Copying	240 Color Copies re 4/7/25 Hearing prep	240.00	\$0.60	\$144.00
4/7/2025	Renae Fusco	E101 Copying	470 B/W copies re 4/7/25 hearing prep	470.00	\$0.10	\$47.00
4/3/2025	Kaylee Paranczak	E102 Outside printing	Reliable (Printing Services Tabbing Binding Hand Delivery [inv.#WL123002])	1.00	\$456.06	\$456.06
4/7/2025	Kaylee Paranczak	E107 Delivery services/messengers	DLS Discovery (Pickup/Delivery from Greenville DE [inv.#267222])	1.00	\$49.50	\$49.50
4/7/2025	Kaylee Paranczak	E110 Out-of-town travel	Amtrak from NYC to De for Dynamic	1.00	\$346.00	\$346.00
4/7/2025	Kaylee Paranczak	E111 Meals	Lunch for FMI Sale Hearing (Purebread Deli 8 people)	1.00	\$133.65	\$133.65
4/1/2025	Kaylee Paranczak	E115 Deposition transcripts	Reliable (Transcript Services from 3/25 [inv.#WL122893])	1.00	\$251.55	\$251.55
4/8/2025	Kaylee Paranczak	E115 Deposition transcripts	Reliable (Transcript Services [inv.#WL123110])	1.00	\$146.00	\$146.00
Total Expenses						\$1,573.76

**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)

Objection Deadline: June 3, 2025 at 4:00 p.m. (ET)

**NOTICE OF SECOND MONTHLY APPLICATION OF CHIPMAN BROWN CICERO
& COLE, LLP, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS
CO-COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE
PERIOD FROM APRIL 1, 2025 THROUGH AND INCLUDING APRIL 30, 2025**

PLEASE TAKE NOTICE that on May 13, 2025, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed the attached *Second Monthly Application of Chipman Brown Cicero & Cole, LLP, for Compensation and Reimbursement of Expenses as Co-Counsel to the Debtors for the Period from April 1, 2025 Through and Including April 30, 2025* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Application, must be filed on or before **June 3, 2025, at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that at the same time, you must serve a copy of the response on the following parties so as to be received on or before the Objection Deadline:

- (i) co-counsel to the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036 (Attn: Gregg M. Galardi; email: gregg.galardi@ropesgray.com) and Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: Mark L. Desgrosseilliers and Robert A. Weber; email: desgross@chipmanbrown.com and weber@chipmanbrown.com) and Chipman Brown Cicero & Cole LLP, 501 5th Ave., 15th Floor, New York, NY 10017 (Attn: Daniel G. Egan; email: egan@chipmanbrown.com);
- (ii) counsel to the DIP Lender, King & Spalding LLP, 1100 Louisiana St., Suite 4100, Houston, TX 77002 (Attn: Michael Fishel; email: mfishel@kslaw.com) 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.

Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Kenneth J. Enos; email: kenos@ycst.com); and

- (iii) the United States Trustee for the District of Delaware, 844 N. King Street, Room 2207, Wilmington, Delaware 19801 Attn: Rosa Sierra-Fox; email: Rosa.Sierra-Fox@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that, pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 132] (“**Interim Compensation Order**”) if no objection to the Application is timely filed, served, and received by the Objection Deadline, CBCC may file a certificate of no objection (a “**CNO**”) with the Court with respect to the fees and expenses requested in the Application. Upon filing a CNO, the Debtors will be authorized and directed to pay CBCC, without need for further order of the Court, an amount equal to the lesser of (i) 80% of the fees and 100% of expenses requested in the Application or (ii) 80% of the fees and 100% of the expenses requested in the Application that are not subject to an objection.

Dated: May 13, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

Robert A. Weber (No. 4013)

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

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-and-

CHIPMAN BROWN CICERO & COLE, LLP

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-and-

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