

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Dynamic Aerostructures LLC, *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF BOB BUTLER IN CONNECTION  
WITH THE RETENTION AND EMPLOYMENT OF BERKELEY RESEARCH  
GROUP, LLC AS FINANCIAL ADVISOR FOR THE DEBTORS**

I, Bob Butler, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I am a Managing Director of Berkeley Research Group, LLC (“BRG”), a professional services firm, with numerous offices throughout the country. I am duly authorized to make this declaration (the “Declaration”) on behalf of BRG. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein and, if called as witness, I could and would testify thereto.<sup>2</sup>

2. On March 4, 2025, the Debtors filed the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Berkeley Research Group, LLC as Financial Advisor for the Debtors, Effective as of the Petition Date* [Docket No. 74] (the “Application”).<sup>3</sup> In support of the Application, BRG filed the *Declaration of Bob Butler in Support of Debtors’*

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<sup>1</sup> 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.

<sup>2</sup> Certain of the disclosures set forth herein relate to matters within the knowledge of other Directors and Managing Directors at BRG and are based on information provided by them.

<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.



*Application for Entry of an Order Authorizing the Retention and Employment of Berkeley Research Group, LLC as Financial Advisor for the Debtors, Effective as of the Petition Date* (the “Initial Declaration”) attached as Exhibit C to the Application. In further support of the Application, on March 21, 2025, BRG filed the *Supplemental Declaration of Bob Butler in Support of Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Berkeley Research Group, LLC as Financial Advisor for the Debtors, Effective as of the Petition Date* [Docket No. 141] (the “First Supplemental Declaration”). On March 21, 2025, the Court entered the *Order Authorizing the Retention and Employment of Berkley Research Group, LLC as Financial Advisor for the Debtors, Effective as of the Petition Date* [Docket No. 150] (the “Retention Order”).

3. I submit this Declaration to provide additional disclosures relating to parties in interest pursuant to the terms of BRG’s Retention Order.

#### **Towerbrook Transaction Disclosure**

4. As of May 1, 2025, BRG is a portfolio company of investment funds managed by TowerBrook Capital Partners (such investment funds and manager, collectively, “TowerBrook”). No facts or circumstances concerning TowerBrook, or any other portfolio company of any investment fund managed by TowerBrook or any other entities affiliated with TowerBrook (collectively, “TowerBrook Entities”) were reviewed or considered as part of preparing the Initial Declaration (and thus were not disclosed as part of the Initial Declaration) as the transaction had not yet occurred. Now that the transaction has closed, BRG makes the following supplemental disclosures. The TowerBrook Entities are under separate managerial control from BRG and do not share any internal systems with BRG. The TowerBrook Entities have no ability to access BRG systems or confidential information, nor does BRG have the ability to access TowerBrook Entities systems or confidential information. Certain TowerBrook

personnel may serve as members of the BRG board of directors (the “BRG Directors”) and the BRG Directors may serve on boards of directors for certain of the TowerBrook Entities. However, the BRG Directors are subject to confidentiality obligations and fiduciary duties, which prohibit and prevent the sharing of confidential information between companies for which they have board of director responsibilities. Despite the separation between BRG and the TowerBrook Entities, BRG files this supplemental declaration in an abundance of caution to further disclose that PT Solutions, a former vendor of the Debtors, is one of the TowerBrook Entities. BRG operates entirely independently from PT Solutions.

5. As such, BRG remains, to the best of my knowledge and insofar as I have been able to ascertain, a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, because BRG and its managing directors and directors (a) are not creditors, equity security holders, or insiders of the Debtors; (b) are not and were not, within two years before the Petition Date, directors, officers, or employees of the Debtors; (c) do not have an interest materially adverse to the interest of the Debtors’ estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors or for any other reason within the meaning of section 327(a) of the Bankruptcy Code.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 14, 2025

/s/ Bob Butler

Bob Butler  
Berkeley Research Group, LLC