

**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: July 18, 2025 at 4:00 p.m. (ET)

Hearing Date: August 5, 2025 at 2:00 p.m. (ET)

**THIRD MONTHLY AND FINAL APPLICATION OF CHIPMAN BROWN CICERO &
COLE, LLP, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS
CO-COUNSEL TO THE DEBTORS FOR THE MONTHLY PERIOD FROM MAY 1,
2025, THROUGH AND INCLUDING JUNE 15, 2025, AND THE FINAL PERIOD FROM
FEBRUARY 26, 2025, THROUGH AND INCLUDING FINAL FEE APPLICATION
HEARING**

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

*Monthly Period for Which Compensation and
Reimbursement is Sought:*

May 1, 2025 through June 15, 2025

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

\$62,332.50

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

\$614.64

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.



2510292250626000000000002

Final Period for Which Compensation and Reimbursement is Sought

February 26, 2025, through and including the hearing on final professional fee applications

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

\$382,705.00²

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

\$8,009.02

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

This is CBCC's final fee application.

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 6.0 hours, with a value of \$3,340.00, in connection with the preparation of the fee application for April 2025.

Prior Applications:

DATE FILED	PERIOD COVERED	REQUESTED		APPROVED	
		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
5/13/2025 D.I. 239	4/1/2025-4/30/2025	\$76,572.50	\$1,573.76	\$61,258.00	\$1,573.76

² The amount of final compensation sought includes an additional \$40,000.00 as an estimate of fees and expenses that CBCC expects to incur from June 15, 2025 through and including the hearing on this fee application and the other professional fee applications. CBCC will file a supplement prior to the hearing date on this fee application to include the actual amount of fees and expenses incurred for such period.

FINAL APPLICATION SUMMARY	
NAME OF APPLICANT	Chipman Brown Cicero & Cole, LLP
NAME OF CLIENT	Debtors and Debtors in Possession
TIME PERIOD COVERED BY FINAL APPLICATION	February 26, 2025, through and including the hearing on final professional fee applications
TOTAL COMPENSATION SOUGHT DURING APPLICATION PERIOD	\$382,705.00 ¹
TOTAL EXPENSES SOUGHT DURING APPLICATION PERIOD	\$8,009.02
PETITION DATE	February 26, 2025
RETENTION DATE	February 26, 2025
DATE OF ORDER APPROVING EMPLOYMENT	March 21, 2025
TOTAL ALLOWED COMPENSATION BY INTERIM COMPENSATION ORDER PAID TO DATE	\$224,298.00
TOTAL ALLOWED EXPENSES BY INTERIM COMPENSATION ORDER PAID TO DATE	\$7,394.38
TOTAL COMPENSATION APPROVED BY INTERIM ORDER TO DATE	\$0.00
TOTAL EXPENSES APPROVED BY INTERIM ORDER TO DATE	\$0.00
BLENDED RATE IN THE FINAL APPLICATION FOR ALL PARTNERS	\$772.77
BLENDED RATE IN THE FINAL APPLICATION FOR ALL ATTORNEYS	\$755.40
BLENDED RATE IN THE FINAL APPLICATION FOR ALL TIMEKEEPERS	\$677.15
NUMBER OF PROFESSIONALS INCLUDED IN THE FINAL APPLICATION	8
NUMBER OF PROFESSIONALS BILLING FEWER THAN FIFTEEN (15) HOURS TO THE CASE DURING THE FINAL APPLICATION PERIOD	5
ARE THERE ANY RATES HIGHER THAN THOSE APPROVED OR DISCLOSED AT RETENTION?	No

¹ The amount of final compensation sought includes an additional \$40,000.00 as an estimate of fees and expenses through and including the conclusion of the bankruptcy cases.

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

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**THIRD MONTHLY AND FINAL APPLICATION OF CHIPMAN BROWN CICERO &
COLE, LLP, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS
CO-COUNSEL TO THE DEBTORS FOR THE MONTHLY PERIOD FROM MAY 1,
2025, THROUGH AND INCLUDING JUNE 15, 2025, AND THE FINAL PERIOD FROM
FEBRUARY 26, 2025, THROUGH AND INCLUDING FINAL FEE APPLICATION
HEARING**

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 2016-2 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**”), co-counsel to the debtors and debtors in possession (the “**Debtors**”), hereby submits its third monthly application (the “**Monthly Application**”) for compensation and reimbursement of expenses for the period from May 1, 2025, through and including June 15, 2025, and final application (the “**Final Application**” and together with the Monthly Application, the “**Application**”) for the period from February 26, 2026, through and including the hearing on the Application. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 132] entered March 20, 2025 (the

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.

“Interim Compensation Order”), and the *Initial Order Establishing Procedures for Payment of Final Fee Applications, and Granting Related Relief* [Docket No. 266] entered June 10, 2025 (the **“Fee Procedures Order”**), CBCC seeks reasonable compensation for services rendered as counsel to the Debtors in the amount of \$62,332.50, together with reimbursement for actual and necessary expenses incurred in the amount of \$614.64, for the monthly period May 1, 2025, through and including June 15, 2025 (the **“Monthly Fee Period”**), and in the amount of \$382,705.00,² together with reimbursement for actual and necessary expenses incurred in the amount of \$8,009.02 for the final period commencing February 26, 2025, through and including the hearing on the Application (the **“Final Fee Period”** and together with the Monthly Fee Period, the **“Application Period”**). In support thereof, CBCC respectfully represents as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over the Debtors, their estates, and these matters 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.

² The amount of final compensation sought includes an additional \$40,000.00 as an estimate of fees and expenses through and including the conclusion of the bankruptcy cases.

4. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-2.

BACKGROUND

A. GENERAL BACKGROUND.

5. On February 26, 2025 (the “**Petition Date**”), each Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Debtors’ chapter 11 cases are procedurally consolidated and jointly administered pursuant to Bankruptcy Rule 1015(b).

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

7. On March 20, 2025, the Court entered the Interim Compensation Order.

8. On June 10, 2025, the Court entered the Fee Procedures Order.

B. THE RETENTION OF CHIPMAN BROWN AND ROPES & GRAY

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**”), and the *Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors Effective as of the Petition Date* [D.I. 151].

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 third monthly and final fee application filed by CBCC in these Chapter 11 Cases.

A. MONTHLY COMPENSATION REQUESTED.

13. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Debtors during the Monthly Application Period, the regular customary billing rates and the total value of time incurred by each of the CBCC attorneys rendering services to the Debtors 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. MONTHLY EXPENSE REIMBURSEMENT.

15. CBCC incurred out-of-pocket expenses during the Monthly Application Period in the amount of \$614.64. 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 2016-2 of the Local Rules.³

16. Pursuant to Local Rule 2016-2, 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.

C. FINAL COMPENSATION AND EXPENSE REQUESTED

17. The Application also covers the Final Fee Period of February 26, 2025, through and including the hearing on the Application. During the Final Fee Period, CBCC performed necessary services and incurred out-of-pocket disbursements for the Debtors and their estates. As set forth in prior monthly applications, in accordance with the factors enumerated in 11 U.S.C. § 330, approval of the fees requested for the Final Fee Period is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under

³ 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 2016-2, CBCC has chosen to comply with such Local Rule. CBCC will supplement this Application with additional detail or information upon request.

this title. In addition, the out-of-pocket disbursements for which reimbursement is sought were actual, reasonable and necessary costs incurred while representing the Debtors.

LEGAL STANDARD

18. 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.

19. 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.

20. 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 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.

21. 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 has properly requested reimbursement of only actual, necessary, and appropriate legal expenses.

22. 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.

23. 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.

24. 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 these cases 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

25. 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

26. The undersigned representative of CBCC certifies that he has reviewed the requirements of Local Rule 2016-2 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 2016-2, CBCC believes that such deviations are not material and respectfully requests that any such requirements be waived.

CONCLUSION

WHEREFORE, CBCC respectfully requests that allowance be made to it in the sum of \$62,332.50 as compensation for necessary professional services rendered to the Debtors for the Monthly Fee Period, and the sum of \$614.64 for reimbursement of actual necessary costs and expenses incurred during that Monthly Fee Period, and final allowance be made to it in the sum of \$382,705.00⁴ as compensation for necessary professional services rendered to the Debtors for the Final Fee Period, and the sum of \$8,009.02 for reimbursement of actual necessary costs and expenses incurred for the Final Fee Period, and further requests such other and further relief as this Court may deem just and proper.

Dated: June 26, 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

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

501 5th Ave. 15th Floor

New York, New York 10017

Telephone: (646) 741-5529

egan@chipmanbrown.com

Co-Counsel to the Debtors and Debtors in Possession

⁴ The amount of final compensation sought includes an additional \$40,000.00 as an estimate of fees and expenses through and including the conclusion of the bankruptcy cases.

**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)

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: June 26, 2025

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

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.

EXHIBIT A**MONTHLY COMPENSATION BY PROFESSIONAL FOR THE PERIOD
MAY 1, 2025, THROUGH AND INCLUDING JUNE 15, 2025**

NAME OF PROFESSIONAL INDIVIDUAL	POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Mark L. Desgrosseilliers	Partner; Member of the Delaware Bar since 2001	\$850	19.2	\$16,320.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$750	51.8	\$38,850.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$375	3.7	\$1,387.50
Renae M. Fusco	Paralegal	\$350	16.5	\$5,775.00
TOTAL:			91.2	\$62,332.50
ATTORNEY COMPENSATION:				\$56,557.50
TOTAL ATTORNEY HOURS:				74.7
BLENDED HOURLY RATE OF ALL TIMEKEEPERS:				\$683.50

**CUMULATIVE SUMMARY OF *FINAL* COMPENSATION BY PROFESSIONAL
FOR THE PERIOD FEBRUARY 26, 2025, THROUGH AND INCLUDING
JUNE 15, 2025**

NAME OF PROFESSIONAL INDIVIDUAL	POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
William E. Chipman, Jr.	Partner; Member of the Delaware Bar since 1999	\$950	2.9	\$2,755.00
Robert A. Weber	Partner; Member of the Delaware Bar since 2000	\$875	11.7	\$10,237.50
Mark L. Desgrosseilliers	Partner; Member of the Delaware Bar since 2001	\$850	123.0	\$104,550.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$750	237.2	\$177,900.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$375	14.6	\$5,475.00
Aaron Bach	Associate; Member of the Delaware Bar since 2024	\$400	13.9	\$5,560.00
Alison Maser	Associate; Member of the Delaware Bar since 2024	\$400	5.2	\$2,080.00
Renae M. Fusco	Paralegal	\$350	97.1	\$33,985.00
Lauren Hitchens	Paralegal	\$325	.5	\$162.50
TOTAL:			506.1	\$342,705.00
ATTORNEY COMPENSATION:				\$308,557.50
TOTAL ATTORNEY HOURS:				408.5
BLENDED HOURLY RATE OF ALL TIMEKEEPERS:				\$677.15

EXHIBIT B

MONTHLY COMPENSATION BY PROJECT CATEGORY FOR THE PERIOD MAY 1, 2025, THROUGH AND INCLUDING JUNE 15, 2025

PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
B110 Case Administration	11.2	\$6,850.00
B120 Asset Analysis and Recovery	0.0	\$0.00
B130 Asset Disposition	0.0	\$0.00
B140 Relief from Stay/Adequate Protection Proceeding	.9	\$675.00
B150 Meetings of and Communications with Creditors	.2	\$150.00
B160 Fee/Employment Applications	16.6	\$10,070.00
B170 Fee/Employment Objections	5.9	\$3,935.00
B180 Avoidance Action Analysis	0.0	\$0.00
B185 Assumption/Rejection of Leases and Contracts	1.9	\$1,425.00
B190 Other Contested Matters (excluding assumption/rejection motions)	0.0	\$0.00
B195 Non-Working Travel (billed at ½ rate)	3.7	\$1,387.50
B200 Operations	0.0	\$0.00
B210 Business Operations	44.2	\$32,390.00
B220 Employee Benefits/Pension	0.0	\$0.00
B230 Financing/Cash Collateral	0.0	\$0.00
B240 Tax Issues	0.0	\$0.00
B250 Real Estate	0.0	\$0.00
B260 Board of Director Matters	6.5	\$5,415.00
B300 Claims and Plan	0.0	\$0.00
B310 Claims Administration and Objections	.1	\$35.00
B320 Plan and Disclosure Statement (including business plan)	0.0	\$0.00
TOTAL:	91.2	\$62,332.50

Date	User	Activity	Description	Hours	Rate	Total
5/8/2025	Daniel Egan	B110 Case Administration	correspondence with R. Fusco regarding hearings (.2); review and revise hearing notice (.1)	0.30	\$750.00	\$225.00
5/8/2025	Renae Fusco	B110 Case Administration	email to Judge Silverstein chambers re hearing date (.1); call w D Egan re same (.1); several emails re hearing dates (.1)	0.30	\$350.00	\$105.00
5/8/2025	Renae Fusco	B110 Case Administration	draft coc re omni hearing date (.2); efile same and upload order (.1)	0.30	\$350.00	\$105.00
5/9/2025	Daniel Egan	B110 Case Administration	review and comment on CNO	0.10	\$750.00	\$75.00
5/9/2025	Renae Fusco	B110 Case Administration	coordinate service of omni hearing order (.1); calendar date (.1)	0.20	\$350.00	\$70.00
5/13/2025	Daniel Egan	B110 Case Administration	review certification of counsel (.1); review and comment on declaration (.4); correspondence with BRG regarding same (.1)	0.60	\$750.00	\$450.00
5/14/2025	Daniel Egan	B110 Case Administration	correspondence with BRG and R. Fusco regarding declaration (.2); review and comment on hearing notice (.2)	0.40	\$750.00	\$300.00
5/21/2025	Daniel Egan	B110 Case Administration	correspondence with R. Fusco regarding certification of counsel	0.10	\$750.00	\$75.00
5/28/2025	Daniel Egan	B110 Case Administration	correspondence with R. Fusco regarding CNO	0.10	\$750.00	\$75.00
5/29/2025	Daniel Egan	B110 Case Administration	review and revise hearing notice	0.20	\$750.00	\$150.00
6/3/2025	Renae Fusco	B110 Case Administration	draft hearing agenda	0.90	\$350.00	\$315.00
6/4/2025	Daniel Egan	B110 Case Administration	review draft CNO	0.10	\$750.00	\$75.00
6/5/2025	Daniel Egan	B110 Case Administration	review and comment on draft hearing agenda	0.20	\$750.00	\$150.00
6/5/2025	Mark Desgrosseilliers	B110 Case Administration	Review notice of agenda	0.20	\$850.00	\$170.00
6/5/2025	Renae Fusco	B110 Case Administration	revise hearing agenda	0.30	\$350.00	\$105.00
6/6/2025	Daniel Egan	B110 Case Administration	review and revise certification of counsel (.2); correspondence with R. Fusco regarding same (.2); review and comment on revised hearing agenda (.1); correspondence with client and Configure regarding hearing (.3)	0.80	\$750.00	\$600.00
6/6/2025	Mark Desgrosseilliers	B110 Case Administration	Prepare for hearing regarding motion to dismiss (.4); communications with BRG regarding same (.1); communications with Jim Carroll regarding same (.2)	0.70	\$850.00	\$595.00
6/6/2025	Renae Fusco	B110 Case Administration	revise hearing agenda (.5); efile same (.2)	0.70	\$350.00	\$245.00
6/6/2025	Renae Fusco	B110 Case Administration	set up zoom appearances re 6/10 hearing	0.10	\$350.00	\$35.00
6/9/2025	Renae Fusco	B110 Case Administration	set up zoom appearance	0.10	\$350.00	\$35.00
6/9/2025	Renae Fusco	B110 Case Administration	prepare hearing binders for 6/10 hearing	0.60	\$350.00	\$210.00
6/10/2025	Daniel Egan	B110 Case Administration	prepare for hearing (2.3); attend same (.7); correspondence with client regarding orders (.1); correspondence with professionals regarding dismissal and next steps (.2)	3.30	\$750.00	\$2,475.00
6/10/2025	Renae Fusco	B110 Case Administration	prepare materials for hearing	0.50	\$350.00	\$175.00
6/10/2025	Renae Fusco	B110 Case Administration	correspondence with chambers re hearing	0.10	\$350.00	\$35.00
		B110 Case Administration		11.20		\$6,850.00
5/9/2025	Daniel Egan	B140 Relief from Stay/Adequate Protection Proceedings	review materials regarding creditor action (.3); draft automatic stay letter (.5); correspondence with client regarding same (.1)	0.90	\$750.00	\$675.00
		B140 Relief from Stay/Adequate Protection Proceedings		0.90		\$675.00
6/3/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	correspondence with creditor regarding case status	0.20	\$750.00	\$150.00
		B150 Meetings of and Communications with Creditors		0.20		\$150.00
5/5/2025	Daniel Egan	B160 Fee/Employment Applications	review administrative advisor fee statement (.6); correspondence with Verita regarding same (.2)	0.80	\$750.00	\$600.00

5/5/2025	Renae Fusco	B160 Fee/Employment Applications	draft notice re Carroll retention app (.4); efile same (.1); coordinate service of same (.1)	0.60	\$350.00	\$210.00
5/6/2025	Daniel Egan	B160 Fee/Employment Applications	review and comment on fee statement exhibits (1.4); review and revise admin advisor fee statement and notice (.5)	1.90	\$750.00	\$1,425.00
5/6/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review final fee application for Configure (.2); review claims agent fee application (.1)	0.30	\$850.00	\$255.00
5/6/2025	Renae Fusco	B160 Fee/Employment Applications	draft notice re Verita 1st fee app (.3); finalize fee app for review (.7); efile same (.1); coordinate service of same (.1)	1.20	\$350.00	\$420.00
5/6/2025	Renae Fusco	B160 Fee/Employment Applications	edit CBCC fee exhibits (.8); draft fee app (.6)	1.40	\$350.00	\$490.00
5/7/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise notices for applications	0.30	\$750.00	\$225.00
5/7/2025	Renae Fusco	B160 Fee/Employment Applications	draft CNO re CBCC fee app (.2); efile same (.1)	0.30	\$350.00	\$105.00
5/7/2025	Renae Fusco	B160 Fee/Employment Applications	draft CNO re Configure 1st fee app	0.30	\$350.00	\$105.00
5/9/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise fee statement and exhibits	1.30	\$750.00	\$975.00
5/9/2025	Renae Fusco	B160 Fee/Employment Applications	draft CNO re BRG fee app (.2); efile same (.1)	0.30	\$350.00	\$105.00
5/12/2025	Daniel Egan	B160 Fee/Employment Applications	revise fee statement (.3); correspondence with client regarding same (.1)	0.40	\$750.00	\$300.00
5/12/2025	Renae Fusco	B160 Fee/Employment Applications	edit CBCC fee app	0.40	\$350.00	\$140.00
5/13/2025	Daniel Egan	B160 Fee/Employment Applications	correspondence with client and R. Fusco regarding fee statement	0.20	\$750.00	\$150.00
5/13/2025	Renae Fusco	B160 Fee/Employment Applications	edit CBCC fee app (.2); efile same (.1); coordinate service of same (.1)	0.40	\$350.00	\$140.00
5/14/2025	Daniel Egan	B160 Fee/Employment Applications	call with Configure regarding fee application	0.20	\$750.00	\$150.00
5/14/2025	Renae Fusco	B160 Fee/Employment Applications	draft Butler 2nd suppl declaration ISO BRG retention	0.20	\$350.00	\$70.00
5/21/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review final fee application for Configure (.4); communications with client regarding same (.3); communications with counsel for Configure regarding same (.2); prepare objection to same (.8); address resolution of objection (.4)	2.10	\$850.00	\$1,785.00
5/28/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review BRG fee application prior to filing same	0.10	\$850.00	\$85.00
5/28/2025	Renae Fusco	B160 Fee/Employment Applications	draft notice re BRG April fee app	0.30	\$350.00	\$105.00
5/28/2025	Renae Fusco	B160 Fee/Employment Applications	draft CNO re KCC fee app (.3); efile same (.1)	0.40	\$350.00	\$140.00
5/29/2025	Daniel Egan	B160 Fee/Employment Applications	review BRG fee statement (.4); correspondence with R. Fusco and BRG regarding same (.1)	0.50	\$750.00	\$375.00
5/29/2025	Renae Fusco	B160 Fee/Employment Applications	revise BRG 2nd fee app (.2); coordinate service of same (.1)	0.30	\$350.00	\$105.00
6/4/2025	Renae Fusco	B160 Fee/Employment Applications	draft cno forCBCC fee app	0.20	\$350.00	\$70.00
6/4/2025	Renae Fusco	B160 Fee/Employment Applications	efile CNO for CBCC 2nd fee app	0.20	\$350.00	\$70.00
6/5/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Prepare for hearing on Configure final fee application	0.20	\$850.00	\$170.00
6/9/2025	Daniel Egan	B160 Fee/Employment Applications	correspondence with client and Configure regarding fee order	0.10	\$750.00	\$75.00
6/9/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Configure final fee order	0.10	\$850.00	\$85.00
6/10/2025	Renae Fusco	B160 Fee/Employment Applications	calendar final fee app deadlines & hearing date	0.20	\$350.00	\$70.00
6/11/2025	Daniel Egan	B160 Fee/Employment Applications	review and comment on May fee statement exhibits (1.1); correspondence with R. Fusco regarding same and final fee application (.1)	1.20	\$750.00	\$900.00
6/15/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Verita final fee application	0.20	\$850.00	\$170.00
		B160 Fee/Employment Applications		16.60		\$10,070.00
5/12/2025	Daniel Egan	B170 Fee/Employment Objections	review UST comments to CRO order (.2); correspondence with client regarding same (.1)	0.30	\$750.00	\$225.00
5/12/2025	Mark Desgrosseilliers	B170 Fee/Employment Objections	Review CRO retention motion and order and US Trustee comments to same (.6); communications with James Carroll concerning same (.1)	0.70	\$850.00	\$595.00

5/13/2025	Renae Fusco	B170 Fee/Employment Objections	edit CRO retention order (.3); draft COC re same (.3)	0.60	\$350.00	\$210.00
5/15/2025	Daniel Egan	B170 Fee/Employment Objections	correspondence with UST and client regarding CRO motion	0.20	\$750.00	\$150.00
5/20/2025	Daniel Egan	B170 Fee/Employment Objections	correspondence with client regarding CRO order	0.10	\$750.00	\$75.00
5/21/2025	Renae Fusco	B170 Fee/Employment Objections	efile Carroll COC	0.40	\$350.00	\$140.00
5/22/2025	Mark Desgrosseilliers	B170 Fee/Employment Objections	Review Configure settlement (.6); revise order regarding same (.2); review fee application for Configure (.2); communications with counsel for Configure (.2)	1.20	\$850.00	\$1,020.00
5/22/2025	Renae Fusco	B170 Fee/Employment Objections	edit configure final fee order	0.20	\$350.00	\$70.00
5/22/2025	Renae Fusco	B170 Fee/Employment Objections	draft COC re configure final fee order	0.40	\$350.00	\$140.00
5/27/2025	Daniel Egan	B170 Fee/Employment Objections	correspondence with client and Configure regarding fee order	0.20	\$750.00	\$150.00
5/27/2025	Mark Desgrosseilliers	B170 Fee/Employment Objections	Review Configure fee resolution (.2); review Certification of counsel regarding same (.3); communications with Avem's counsel regarding same (.2); communications with US Trustee regarding same (.2); communications with counsel for Configure regarding same (.3)	1.20	\$850.00	\$1,020.00
5/27/2025	Renae Fusco	B170 Fee/Employment Objections	revise Configure COC (.2); efile same (.2)	0.40	\$350.00	\$140.00
		B170 Fee/Employment Objections		5.90		\$3,935.00
5/30/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	calls with client and landlord regarding lease issues (.4); various email correspondence with client and landlord regarding same (.3)	0.70	\$750.00	\$525.00
6/1/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	review issues regarding lease and lease payments	0.30	\$750.00	\$225.00
6/2/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	call with landlord regarding lease (.2); review issues regarding same (.4)	0.60	\$750.00	\$450.00
6/5/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	correspondence with client regarding lease	0.10	\$750.00	\$75.00
6/6/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	call with landlord regarding lease	0.20	\$750.00	\$150.00
		B185 Assumption/Rejection of Leases and Contracts		1.90		\$1,425.00
6/10/2025	Daniel Egan	B195 Non-Working Travel	travel to and from Wilmington for hearing	3.70	\$375.00	\$1,387.50
		B195 Non-Working Travel (billed at 1/2 rate)		3.70		\$1,387.50
5/1/2025	Daniel Egan	B210 Business Operations	call with client and BRG regarding wind-down issues (.7); revise Carroll engagement agreement (.3); revise CRO motion (.3); correspondence with J. Carroll regarding same (.1); revise dismissal motion (.4); correspondence with BRG and Verita regarding same (.1)	1.90	\$750.00	\$1,425.00
5/2/2025	Daniel Egan	B210 Business Operations	call with BRG regarding wind-down issues (.6); revise wind-down motion (.8); analyze wind-down budget issues (.5); correspondence with utility provider regarding deposit (.1); correspondence with Verita regarding wind-down (.2)	2.20	\$750.00	\$1,650.00
5/3/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding CRO retention	0.20	\$750.00	\$150.00
5/5/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding dismissal issues	0.30	\$750.00	\$225.00
5/5/2025	Daniel Egan	B210 Business Operations	call with J. Carroll and BRG regarding next steps (1.0); review and finalize CRO motion (.9); correspondence with CRO and R. Fusco regarding same (.3); correspondence with BRG regarding utility account (.1); correspondence with Hackler Flynn regarding employment claims (.2); correspondence with BRG regarding budget (.2)	2.70	\$750.00	\$2,025.00
5/5/2025	Mark Desgrosseilliers	B210 Business Operations	Review budget and wind-down matters (.3); call with BRG and Jim Carroll regarding same (.4); follow-up concerning same (.2)	0.90	\$850.00	\$765.00

5/6/2025	Daniel Egan	B210 Business Operations	call with client and CRO regarding wind-down (.5); correspondence with client regarding government registrations (.1); review issues regarding same (.4); correspondence with client regarding utilities (.2); call with Ropes regarding status and next steps (.3)	1.50	\$750.00	\$1,125.00
5/7/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding accounts (.3); further revise wind-down motion and order (.4); review issues regarding pending litigation (.6)	1.30	\$750.00	\$975.00
5/8/2025	Daniel Egan	B210 Business Operations	call with Hackler Flynn regarding employment claim issues (.5); analyze same (.3); review and revise letter regarding same (.2); review revised wind-down budget (.1); various correspondence with client and BRG regarding same (.4); correspondence with client and escrow agent regarding account (.2); revise dismissal motion (.3); correspondence with Ropes regarding same (.1)	2.10	\$750.00	\$1,575.00
5/8/2025	Mark Desgrosseilliers	B210 Business Operations	Review wind-down budget and professional fees in connection with motion to dismiss (.6); review CRO retention and related issues (.3)	0.90	\$850.00	\$765.00
5/9/2025	Daniel Egan	B210 Business Operations	call with CRO and BRG regarding wind-down (1.0); correspondence with Verita and J. Carroll regarding accounts (.3); review escrow agreement (.4); revise wind-down motion (.4); correspondence with client and lender regarding same (.2)	2.30	\$750.00	\$1,725.00
5/12/2025	Daniel Egan	B210 Business Operations	review status report (.2); correspondence with client regarding accounts (.2); call with client regarding lease issues (.2); review lease and order regarding same (.4)	1.00	\$750.00	\$750.00
5/13/2025	Daniel Egan	B210 Business Operations	various correspondence with lender and client regarding dismissal (.6); revise CRO order (.3)	0.90	\$750.00	\$675.00
5/13/2025	Daniel Egan	B210 Business Operations	analyze issues regarding lease and company accounts	0.40	\$750.00	\$300.00
5/14/2025	Daniel Egan	B210 Business Operations	correspondence with lender regarding dismissal motion and related issues (.4); review and finalize dismissal motion (1.1); further revise CRO order (.2); correspondence with client and UST regarding same (.2)	1.90	\$750.00	\$1,425.00
5/14/2025	Daniel Egan	B210 Business Operations	various correspondence with client and BRG regarding wind-down issues	0.50	\$750.00	\$375.00
5/14/2025	Mark Desgrosseilliers	B210 Business Operations	Review motion to dismiss cases prior to filing same	0.30	\$850.00	\$255.00
5/14/2025	Renae Fusco	B210 Business Operations	draft notice re motion to dismiss (.4); efile motion (.1); coordinate service of same (.1)	0.60	\$350.00	\$210.00
5/16/2025	Daniel Egan	B210 Business Operations	analyze wind-down issue	0.40	\$750.00	\$300.00
5/19/2025	Daniel Egan	B210 Business Operations	correspondence with US Trustee and BRG regarding dismissal motion	0.30	\$750.00	\$225.00
5/19/2025	Daniel Egan	B210 Business Operations	correspondence with BRG regarding administrative expenses	0.20	\$750.00	\$150.00
5/19/2025	Renae Fusco	B210 Business Operations	review LLC agreements	0.30	\$350.00	\$105.00
5/20/2025	Daniel Egan	B210 Business Operations	call with client regarding wind-down funds (.2); correspondence with BRG regarding same and disbursements (.2)	0.40	\$750.00	\$300.00
5/21/2025	Daniel Egan	B210 Business Operations	draft status report for CRO (.4); correspondence with CRO regarding same (.1); review APA and schedules regarding assumed liability issues (.3); correspondence with client regarding same (.1)	0.90	\$750.00	\$675.00
5/22/2025	Daniel Egan	B210 Business Operations	call with UST regarding quarterly fees and MORs (.1); correspondence with BRG regarding same (.2)	0.30	\$750.00	\$225.00

5/23/2025	Daniel Egan	B210 Business Operations	call with BRG regarding MORs (.2); correspondence with US Trustee regarding same (.1); correspondence with client and Ropes regarding dismissal issues (.3); review organizational documents regarding same (.4)	1.00	\$750.00	\$750.00
5/24/2025	Daniel Egan	B210 Business Operations	correspondence with Ropes regarding case dismissal	0.10	\$750.00	\$75.00
5/24/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding administrative expenses	0.20	\$750.00	\$150.00
5/26/2025	Daniel Egan	B210 Business Operations	review issue regarding dismissal motion	0.40	\$750.00	\$300.00
5/27/2025	Daniel Egan	B210 Business Operations	review revised corrected MOR (.4); correspondence with client and BRG regarding same (.2); review and comment on status report for board (.2)	0.80	\$750.00	\$600.00
5/27/2025	Mark Desgrosseilliers	B210 Business Operations	Review operating reports for March and April (.3); communications with client regarding same (.2); communications with client concerning case updates (.2)	0.70	\$850.00	\$595.00
5/28/2025	Daniel Egan	B210 Business Operations	various correspondence with client and BRG regarding corrected MOR	0.30	\$750.00	\$225.00
5/28/2025	Mark Desgrosseilliers	B210 Business Operations	Review operating reports (.2); review communications with client (.1)	0.30	\$850.00	\$255.00
5/28/2025	Renae Fusco	B210 Business Operations	finalize & efile corrected MOR	0.40	\$350.00	\$140.00
5/29/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding MOR (.1); review revised cash flow analysis (.2)	0.30	\$750.00	\$225.00
5/30/2025	Daniel Egan	B210 Business Operations	correspondence with client and UST regarding dismissal motion	0.20	\$750.00	\$150.00
5/30/2025	Daniel Egan	B210 Business Operations	call with BRG regarding cash flow (.3); review and comment on report regarding same (.4)	0.70	\$750.00	\$525.00
5/30/2025	Mark Desgrosseilliers	B210 Business Operations	Review motion to dismiss and US Trustee request concerning same (.2); review Board updates (.1); communications with client (.1)	0.40	\$850.00	\$340.00
6/2/2025	Daniel Egan	B210 Business Operations	revised proposed initial and final orders on dismissal (.3); correspondence with R. Fusco regarding same (.1)	0.40	\$750.00	\$300.00
6/2/2025	Renae Fusco	B210 Business Operations	edit motion to dismiss orders	0.20	\$350.00	\$70.00
6/3/2025	Daniel Egan	B210 Business Operations	correspondence with BRG regarding operating reports	0.10	\$750.00	\$75.00
6/4/2025	Daniel Egan	B210 Business Operations	draft status report for board (.4); correspondence with CRO regarding same and account issues (.3); review and comment on draft operating reports (.9); correspondence with BRG and CRO regarding same (.2)	1.80	\$750.00	\$1,350.00
6/5/2025	Daniel Egan	B210 Business Operations	various correspondence with client and UST regarding dismissal motion (.4); further review and revise drafts orders on same (.3)	0.70	\$750.00	\$525.00
6/5/2025	Daniel Egan	B210 Business Operations	review account summaries (.2); correspondence with BRG and CRO regarding operating reports (.2); review revised drafts of same (.3)	0.70	\$750.00	\$525.00
6/5/2025	Mark Desgrosseilliers	B210 Business Operations	Review proposed changes to dismissal order and responses to same (.3); review post- closing operating reports prior to filing same (.1); prepare for hearing on same (.2)	0.60	\$850.00	\$510.00
6/5/2025	Renae Fusco	B210 Business Operations	finalize MOR's and efile same (.6); coordinate service of same (.1)	0.70	\$350.00	\$245.00
6/6/2025	Daniel Egan	B210 Business Operations	correspondence with BRG regarding claims and accounts	0.30	\$750.00	\$225.00
6/6/2025	Renae Fusco	B210 Business Operations	draft COC re dismissal motion (.7); efile same (.1)	0.80	\$350.00	\$280.00
6/9/2025	Daniel Egan	B210 Business Operations	correspondence with client regarding dismissal hearing (.3); prepare for same (1.1)	1.40	\$750.00	\$1,050.00
6/9/2025	Daniel Egan	B210 Business Operations	correspondence with BRG regarding distributions (.1); review financing order regarding same (.2)	0.30	\$750.00	\$225.00
6/9/2025	Mark Desgrosseilliers	B210 Business Operations	Prepare for initial hearing on dismissal order	0.60	\$850.00	\$510.00

6/10/2025	Daniel Egan	B210 Business Operations	correspondence with BRG and CRO regarding accounts and next steps	0.40	\$750.00	\$300.00
6/10/2025	Mark Desgrosseilliers	B210 Business Operations	Prepare for hearing regarding motion to dismiss and retention of Carroll Services (.4); attend same (.7); follow-up regarding same (.3)	1.40	\$850.00	\$1,190.00
6/10/2025	Renae Fusco	B210 Business Operations	correspondence with M Desgrosseilliers regarding corporate organizational docs	0.60	\$350.00	\$210.00
6/11/2025	Daniel Egan	B210 Business Operations	various correspondence with CRO and BRG regarding distribution issues (.6); analyze same (.3)	0.90	\$750.00	\$675.00
6/11/2025	Daniel Egan	B210 Business Operations	various correspondence with CRO and BRG regarding distribution issues (.6); analyze same (.3); correspondence with client and M. Desgrosseilliers regarding status update for board (.2)	1.10	\$750.00	\$825.00
6/11/2025	Mark Desgrosseilliers	B210 Business Operations	Call with BRG concerning wind-down (.4); communications with client regarding same (.2); review correspondence concerning same (.1)	0.70	\$850.00	\$595.00
B210 Business Operations				44.20		\$32,390.00
5/1/2025	Daniel Egan	B260 Board of Directors Matters	call with Board regarding CRO and dismissal (.3); draft resolutions for same (.8)	1.10	\$750.00	\$825.00
5/1/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Prepare for Board meeting (.4); review wind-down budget and related matters (.2); communications with Jim Carroll regarding same (.1); attend Board meeting (.4); follow-up regarding same (.1)	1.20	\$850.00	\$1,020.00
5/2/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Review wind-down budget (.2); call with BRG regarding same (.2); follow-up concerning same (.3)	0.70	\$850.00	\$595.00
5/6/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Continue to review wind-down budget and related matters (.4); communications with James Carroll regarding same (.2); communications with BRG regarding same (.2); call with Board chair and CRO (.3); follow-up with co-counsel regarding same (.2)	1.30	\$850.00	\$1,105.00
5/12/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Review pending matters in connection with Board update (.4); prepare update (.2); communications with James Carroll concerning same (.2)	0.80	\$850.00	\$680.00
5/13/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Review Carroll service retention motion (.2); review US Trustee comments to Carroll Services order (.3); call with James Carroll concerning same (.1)	0.60	\$850.00	\$510.00
6/10/2025	Mark Desgrosseilliers	B260 Board of Directors Matters	Review organizational documents in connection with post-dismissal structure and dissolution	0.80	\$850.00	\$680.00
B260 Board of Directors Matters				6.50		\$5,415.00
6/3/2025	Renae Fusco	B310 Claims Administration and Objections	email POC letter to claims agent	0.10	\$350.00	\$35.00
B310 Claims Administration and Objections				0.10		\$35.00
Total Fees				91.20		\$62,332.50

**CUMULATIVE *FINAL* SUMMARY OF PROFESSIONAL SERVICES
 RENDERED BY PROJECT CATEGORY FOR THE PERIOD
 FEBRUARY 26, 2025, THROUGH AND INCLUDING
JUNE 15, 2025**

PROJECT CATEGORY	TOTAL HOURS	TOTAL FEES
B110 Case Administration	70.1	\$39,000.00
B120 Asset Analysis and Recovery	0.0	\$0.00
B130 Asset Disposition	111.0	\$80,120.00
B140 Relief from Stay/Adequate Protection Proceeding	2.0	\$1,615.00
B150 Meetings of and Communications with Creditors	10.1	\$6,535.00
B160 Fee/Employment Applications	71.7	\$42,270.00
B170 Fee/Employment Objections	5.9	\$3,935.00
B180 Avoidance Action Analysis	0.0	\$0.00
B185 Assumption/Rejection of Leases and Contracts	15.2	\$10,925.00
B190 Other Contested Matters (excluding assumption/rejection motions)	53.1	\$37,100.00
B195 Non-Working Travel	14.6	\$5,475.00
B200 Operations	0.0	\$0.00
B210 Business Operations	94.3	\$70,055.00
B220 Employee Benefits/Pension	.4	\$140.00
B230 Financing/Cash Collateral	46.4	\$36,500.00
B240 Tax Issues	.6	\$210.00
B250 Real Estate	0.0	\$0.00
B260 Board of Director Matters	10.6	\$8,790.00
B300 Claims and Plan	0.0	\$0.00
B310 Claims Administration and Objections	.1	\$35.00
B320 Plan and Disclosure Statement (including business plan)	0.0	\$0.00
TOTAL:	506.1	\$342,705.00

EXHIBIT C**MONTHLY EXPENSE SUMMARY FOR THE PERIOD FOR THE PERIOD
MAY 1, 2025, THROUGH AND INCLUDING JUNE 15, 2025**

EXPENSE CATEGORY	SERVICE PROVIDER (IF APPLICABLE)	TOTAL EXPENSES
E101 Copying	In House	\$158.40
E102 Outside Printing	Reliable	\$82.94
E107 Delivery services/messengers	Reliable	\$10.00
E110 Out of Town Travel	Amtrak	\$283.00
E116 Transcripts	Reliable	\$80.30
TOTAL:		\$614.64

Date	Activity	Description	Amount	Rate	Total
6/9/2025	E101 Copying	444 b/w copies re 6/10 hearing binder prep	444.00	\$0.10	\$44.40
6/10/2025	E101 Copying	190 color copies re 6/10 hearing	190.00	\$0.60	\$114.00
		E101 Copying			\$158.40
6/5/2025	E102 Outside printing	Reliable (Printing Services Tabbing Binding Hand Delivery to Court [inv.#WL124179])	1.00	\$36.20	\$36.20
6/6/2025	E102 Outside printing	Reliable (Printing Services Binding Hand Delivery to Court [inv.#WL124235])	1.00	\$46.74	\$46.74
		E102 Outside printing			\$82.94
6/12/2025	E107 Delivery services/messengers	Reliable (Hand Delivery Service [inv.#WL124351])	1.00	\$10.00	\$10.00
		E107 Delivery services/messengers			\$10.00
6/10/2025	E110 Out-of-town travel	Amtrak from NYC to Delaware for Dynamic Aerostructures hearing for Dan Egan 6.10.25	1.00	\$283.00	\$283.00
		E110 Out-of-town travel			\$283.00
6/10/2025	E116 Transcripts	Reliable (Daily Transcript Services [inv.#WL124322])	1.00	\$80.30	\$80.30
		E116 Transcripts			\$80.30
		Total Expenses			\$614.64

**CUMULATIVE *FINAL* EXPENSE SUMMARY FOR THE PERIOD
FEBRUARY 26, 2025, THROUGH AND INCLUDING JUNE 15, 2025**

EXPENSE CATEGORY	SERVICE PROVIDER (IF APPLICABLE)	TOTAL EXPENSES
E101 Copying	In-House	\$1,368.10
E102 Outside Printing	Reliable/DLS Discovery	\$3,160.77
E107 Delivery Services/Messengers	Reliable/DLS Discovery	\$59.50
E110 Out of Town Travel	Amtrak/Hotel DuPont	\$2,028.60
E111 Meals	Purebread Deli/Janssen's	\$457.15
E112 Court Fees	USBC/USDC	\$299.00
E116 Transcripts	Reliable	\$635.90
TOTAL:		\$8,009.02

**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)

)

) **Hearing Date: August 5, 2025 at 2:00 p.m. (ET)**

) **Obj. Deadline: July 18, 2025 at 4:00 p.m. (ET)**

**NOTICE OF THIRD MONTHLY AND FINAL APPLICATION OF CHIPMAN BROWN
CICERO & COLE, LLP, FOR COMPENSATION AND REIMBURSEMENT OF
EXPENSES AS CO-COUNSEL TO THE DEBTORS FOR THE MONTHLY PERIOD
FROM MAY 1, 2025, THROUGH AND INCLUDING JUNE 15, 2025, AND THE FINAL
PERIOD FROM FEBRUARY 26, 2025, THROUGH AND INCLUDING FINAL FEE
APPLICATION HEARING**

PLEASE TAKE NOTICE that the *Third Monthly and Final Application Of Chipman Brown Cicero & Cole, LLP, for Compensation and Reimbursement of Expenses as Co-Counsel to the Debtors for the Monthly Period from May 1, 2025, Through and Including June 15, 2025, and the Final Period from February 26, 2025, Through and Including Final Fee Application Hearing* (the “**Final Fee Application**”) has been filed with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections (“**Objections**”) to the Final Fee Application, if any, must be filed on or before **July 18, 2025 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801.

You must also serve any such Objection so as to be received by the following on or before the Objection Deadline: (a) (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 Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE

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.

19801 (Attn: Kenneth J. Enos; email: kenos@ycst.com); and (iii) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, DE 19801 (Attn: Linda Casey; email: linda.casey@usdoj.gov).

A HEARING ON THE FINAL APPLICATION WILL BE HELD ON **AUGUST 5, 2025 AT 2:00 P.M. (ET)** BEFORE THE HONORABLE LAURIE SELBER SILVERSTEIN, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE FINAL APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 26, 2025
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

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

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Counsel to the Debtors and Debtors in Possession