

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 (xxx)

(*Joint Administration Pending*)

**DEBTORS' MOTION FOR ENTRY OF ORDER (I) AUTHORIZING DEBTORS TO
FILE A CONSOLIDATED (A) CREDITOR MATRIX AND (B) TOP 30
CREDITORS LIST, (II) AUTHORIZING REDACTION OF CERTAIN PERSONAL
IDENTIFICATION INFORMATION, AND (III) GRANTING RELATED RELIEF**

Dynamic Aerostructures LLC and its affiliated debtors and debtors in possession (each, a “Debtor” and collectively, the “Debtors”) in the above-captioned chapter 11 cases, by and through their undersigned proposed counsel, hereby submit this motion (this “Motion”) for entry of an order granting the relief described below. In support hereof, the Debtors rely on the *Declaration of Eric Ellis in Support of Debtors' Chapter 11 Petitions and First Day Motions* (the “First Day Declaration”)² filed concurrently herewith and incorporated by reference herein, and further represent as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction to consider this Motion 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.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Dynamic Aerostructures LLC (3076); Dynamic Aerostructures Intermediate LLC (9800); and Forrest Machining LLC (3421). The Debtors’ service address is 27756 Avenue Mentry, Valencia, California 91355.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.



2. Pursuant to Rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtors confirm their consent to the entry of a final order by this Court in connection with this Motion to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of these chapter 11 cases and this Motion is proper in this district under 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are sections 105(a), 107(c), 342(a) and 521 of title 11 of the United States Code (the “Bankruptcy Code”). The relief requested herein is also appropriate in accordance with Rules 1007, 2002(d), 2002(m), 9007, 9013, and 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Local Rules 1001-1(c), 1007-1, 1007-2, 2002-1, 9013-1(m), and 9018-1(d).

RELIEF REQUESTED

5. The Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”): (i) authorizing the Debtors to file a consolidated (a) list of creditors (the “Consolidated Creditor Matrix”) in lieu of submitting a separate mailing matrix for each Debtor and (b) list of the Debtors’ thirty (30) largest unsecured creditors (the “Consolidated Top 30 Creditors List”) in lieu of submitting a separate list for each Debtor; (ii) authorizing the Debtors to redact certain personal identification information; and (iii) granting related relief.

BACKGROUND

6. 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. Concurrently with the filing of this Motion, the Debtors filed a motion requesting procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases, and no official committee of unsecured creditors has been appointed in these chapter 11 cases.

7. The Debtors are a leading manufacturer and supplier of critical structural components and assemblies for the aerospace and defense industry. The Debtors specialize in complex, large-format structural airframe and wing components, large aluminum structures, and complex assemblies for key aerospace and defense customers such as Lockheed Martin, Northrop Grumman, and Boeing, among others. The Debtors have one of the largest independent aerospace and defense manufacturing sites in North America, operating out of 226,000 square feet across two facilities in Southern California.

8. Additional factual background regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the filing of these chapter 11 cases, is set forth in detail in the First Day Declaration, filed concurrently herewith and incorporated herein by reference.

BASIS FOR RELIEF REQUESTED

I. A CONSOLIDATED CREDITOR MATRIX IS APPROPRIATE AND SHOULD BE APPROVED

9. Section 521(a)(1)(A) of the Bankruptcy Code requires a debtor to file a list of creditors. *See* 11 U.S.C. § 521(a)(1)(A). Additionally, Bankruptcy Rule 1007(a)(1) requires a debtor to file “a list containing the name and address of each entity included or to be included on Schedules D, E/F, G, and H.” Fed. R. Bank. P. 1007(a)(1). Likewise, Local Rule 1007-2(a)

requires a debtor to file, together with its voluntary petition, a list containing the name and complete address of each creditor. *See* Del. Bankr. L.R. 1007-2(a). Local Rule 2002-1(f)(v) further requires each debtor in jointly administered cases, or its duly retained claims and noticing agent, to maintain a separate creditor matrix for each debtor. Del. Bankr. L.R. 2002-1(f)(v).

10. Local Rule 1001-1(c), however, authorizes the Court to modify the application of the Local Rules “in the interest of justice.” Del. Bankr. L.R. 1001-1(c). Section 105(a) of the Bankruptcy Code allows the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a).

11. The Debtors submit that permitting them to maintain the Consolidated Creditor Matrix, in lieu of filing a separate creditor matrix for each Debtor, is warranted in these chapter 11 cases. Requiring the Debtors to segregate and convert their computerized records to a Debtor-specific creditor matrix format would be an unnecessarily burdensome task and result in duplicate mailings. Because the Debtors have hundreds of creditors and other parties in interest, converting the Debtors’ computerized information to a format compatible with the matrix requirements would also greatly increase the risk of error with respect to the information already on computerized systems.

12. Furthermore, the Debtors have filed an application to retain and employ a claims and noticing agent contemporaneously with the filing of this Motion. If such application is granted, the claims and noticing agent will assist with, among other tasks, mailing of notices to parties. The Debtors believe that the Consolidated Creditor Matrix will be sufficient to allow their claims and noticing agent to provide notice to all creditors as well as applicable parties in interest during the chapter 11 cases, as required by Local Rule 1007-2.

13. Courts in this district have routinely granted the same or similar relief to chapter 11 debtors. *See, e.g., In re American Tire Distributors, Inc., et al.*, Case No. 24-12391 (CTG) [Docket No. 78] (Bankr. D. Del. Oct. 25, 2024) (authorizing the debtors to, among other things, file a consolidated creditor matrix, file a consolidated top 30 list of unsecured creditors, and redact certain confidential or personally identifiable information); *In re True Value Co., L.L.C., et al.*, 24-12337 (KBO) [Docket No. 92] (Bankr. D. Del. Oct. 17, 2024) (same); *In re Tupperware Brands Corp., et al.*, Case No. 24-12156 (BLS) [Docket No. 72] (Bankr. D. Del. Sept. 20, 2024) (same); *In re Hardinge Inc., et al.*, Case No. 24-11605 (JKS) [Docket No. 64] (Bankr. D. Del. July 30, 2024) (same); *Optio Rx, LLC, et al.*, Case No. 24-11188 (TMH) [Docket No. 28] (Bankr. D. Del. June 11, 2024) (same); *In re Armstrong Flooring, Inc., et al.* Case No. 22-10426 (MFW) [Docket No. 100] (Bankr. D. Del. May 12, 2022) (same).³

II. A CONSOLIDATED TOP 30 CREDITORS LIST IS APPROPRIATE AND SHOULD BE APPROVED

14. Pursuant to Bankruptcy Rule 1007(d), a debtor must file, together with its voluntary petition, a list setting forth the names, addresses, and claim amounts of the creditors, excluding insiders, who hold the 20 largest unsecured claims in the debtor's case. Fed. R. Bankr. P. 1007(d).

15. To provide the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") with a clear picture of the Debtors' creditor constituency, however, the Debtors have prepared the Consolidated Top 30 Creditors List as opposed to a list of the twenty (20) largest unsecured creditors for each Debtor.

16. One of the primary purposes of filing a list of a debtor's largest unsecured creditors is to facilitate the U.S. Trustee's evaluation of the types and amounts of unsecured claims asserted

³ Because of the voluminous nature of the orders cited herein, such orders have not been attached to this Motion. Copies of these orders are available upon request to the Debtors' proposed counsel.

against a debtor so that the U.S. Trustee can make an informed decision when identifying potential candidates to serve on an official committee of unsecured creditors. *See In re Dandy Doughboy Donuts, Inc.*, 66 B.R. 457, 458 (Bankr. S.D. Fla. 1986) (“The purpose of the separate list of 20 largest creditors required by [Bankruptcy Rule 1007(d)] is to enable the clerk to identify members and the court to appoint immediately an unsecured creditors’ committee in compliance with 11 U.S.C. 1102(a)(1).”). Because the Debtors’ significant unsecured creditors are captured on the Consolidated Top 30 Creditors List, it will provide the U.S. Trustee with a sufficiently clear picture of the Debtors’ unsecured creditor constituency.

17. The Debtors share a common nucleus of large creditors. Because the top creditors of the Debtors could overlap, and certain Debtors may have fewer than twenty significant unsecured creditors, filing separate top twenty (20) creditor lists for each Debtor would be of limited utility. A Consolidated Top 30 Creditors List will sufficiently aid the U.S. Trustee in communicating with these creditors. Also, compiling separate top twenty (20) creditor lists for each individual Debtor would consume a substantial amount of the Debtors’ time and resources. On the other hand, the Consolidated Top 30 Creditors List will help alleviate administrative burdens, costs, and the possibility of duplicative service. Accordingly, the Debtors submit that filing a single consolidated list of the top thirty (30) largest unsecured creditors in these cases is appropriate.

18. Courts in this jurisdiction have approved relief similar to the relief requested herein with respect to filing a single consolidated list of the largest unsecured creditors of a debtor and its debtor affiliates. *See, e.g., Legacy IMBDS, Inc. (f/k/a iMedia Brands, Inc.)*, No. 23-10852 (KBO) (Bankr. D. Del. July 26, 2023) (authorizing a consolidated general unsecured creditors list); *In re FB Debt Financing Guarantor, LLC*, No. 23-10025 (KBO) (Bankr. D. Del. Jan. 13, 2023) (same);

In re OSG Grp. Holdings, Inc., No. 22-10718 (JTD) (Bankr. D. Del. Aug. 9, 2022) (same); *In re Enjoy Technology, Inc.*, No. 22-10580 (JKS) (Bankr. D. Del. July 1, 2022) (same); *In re TPC Grp. Inc.*, No. 22-10493 (CTG) (Bankr. D. Del. June 30, 2022) (same).⁴

III. CAUSE EXISTS TO REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION CONTAINED IN THE CONSOLIDATED CREDITOR MATRIX AND CONSOLIDATED TOP 30 CREDITORS LIST

19. Although the public has a common law “[r]ight of access to judicial proceedings and records[.]” *Goldstein v. Forbes (In re Cendant Corp.)*, 260 F.3d 183, 192 (3d Cir. 2001), the Bankruptcy Code permits courts, in appropriate circumstances, to protect individuals from an undue risk of identity theft or other unlawful injury by limiting the public’s access, placing papers under seal, or otherwise entering orders to prohibit the dissemination of sensitive information. 11 U.S.C. § 107(c); *see In re Cendant Corp.*, 260 F.3d at 194 (noting the public’s right of access “is not absolute”) (citation and internal quotation marks omitted); *see also Leucadia, Inc. v. Applied Extrusion Tech., Inc.*, 998 F.2d 157, 165 (3d Cir. 1993) (“Although the right of access is firmly entrenched, so also is the correlative principle that the right . . . is not absolute.”) (internal citations omitted).

20. Specifically, section 107 of the Bankruptcy Code enables a court to issue orders that protect parties from the potential harm that could result from disclosing confidential information. Section 107(b) of the Bankruptcy Code provides, in pertinent part, as follows:

On the request of a party in interest, the bankruptcy court shall, and on the bankruptcy court’s own motion, the bankruptcy court may

⁴ Because of the voluminous nature of the orders cited herein, such orders have not been attached to this Motion. Copies of these orders are available upon request to the Debtors’ proposed counsel.

protect an entity with respect to a trade secret or confidential research, development, or commercial information[.]

11 U.S.C. § 107(b)(1); *see* Fed. R. Bankr. P. 9018 (same).

21. Additionally, section 107(c)(1) of the Bankruptcy Code provides:

The bankruptcy court, for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:

(A) Any means of identification (as defined in section 1028(d) of title 18 [of the United States Code]) contained in a paper filed, or to be filed, in a case under th[e Bankruptcy Code].

(B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1).

22. As a result of the foregoing, out of an abundance of caution, the Debtors respectfully submit that it is appropriate to authorize the Debtors to redact from any paper filed or to be filed with the Court in the Chapter 11 Cases the email addresses and home addresses of any of the Debtors' individual creditors and equity security holders, to the extent applicable, to ensure the Debtors are not exposed to potential civil liability and significant financial penalties.

23. In addition, privacy protection regulations have been enacted in jurisdictions in which the Debtors do business. For instance, in 2018, the state of California enacted the California Consumer Privacy Act of 2018 (the "CCPA"), which provides individuals domiciled in California the right to, among other things, request their collected personal information, including postal addresses, be deleted by entities subject to the regulation.⁵ Violators risk injunctions and civil

⁵ In *Pier 1 Imports*, Judge Huennkens was aware that publishing certain unredacted documents on the docket could implicate serious CCPA issues: "the State of California has adopted very extensive privacy provisions that would cover something like this. And do we need—I mean, and this does—this company does business in California. I mean, they're going to be concerns there, are there not?" Hr'g Tr. 43:2–6, *In re Pier 1 Imports, Inc.*,

penalties of up to \$2,500 for *each* violation and up to \$7,500 for *each intentional* violation. Cal. Civ. Code § 1798.155.

24. In addition, disclosing such information could be used by third parties to, among other things, perpetrate identity theft or locate survivors of domestic violence or stalking who have otherwise taken steps to conceal their whereabouts. This risk is not merely speculative. In at least one chapter 11 case, the abusive former partner of a debtor's employee exploited the publicly accessible creditor and employee information filed in the chapter 11 case to track the employee to her new address, which had not been publicly available until then, forcing the employee to change addresses again for her safety.⁶ The Debtors propose to provide an unredacted version of the Consolidated Creditor Matrix and Consolidated Top 30 Creditors List and any other redacted, applicable filings to this Court, the U.S. Trustee, counsel to any statutory committee appointed in the chapter 11 cases, and other parties in interest upon reasonable request (email being sufficient) to the Debtors or this Court that is reasonably related to these chapter 11 cases.

25. Courts in this district have stressed the importance of authorizing debtors to redact individual creditors' personally identifiable information, including home addresses in particular. In overruling an objection by the U.S. Trustee in *Art Van Furniture* to relief similar to that which is being requested herein, Judge Sontchi noted that the proposed redaction is not a "burden of proof" issue so "much as a common sense issue." Hr'g Tr. at 25:6–7, *In re Art Van Furniture, LLC*, No. 20-10553 (CSS) (Bankr. D. Del. Mar. 10, 2020) [Docket No. 82].⁷ Judge Sontchi found

No. 20- 30805 (KRH) (Bankr. E.D. Va. Mar. 13, 2020) [Docket No. 359].

⁶ The incident, which took place during the first Charming Charlie chapter 11 proceedings in 2017, is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings, Inc.*, Case No. 19-11534 (CSS) (Bankr. D. Del. Jul. 11, 2019) [Docket No. 4].

⁷ Similarly, Judge Sontchi previously overruled the U.S. Trustee's objection to the redaction of individuals' information and found that "it's just plain common sense in 2019—soon to be 2020—to put as little information out as possible about people's personal lives to present [sic] scams . . . [Identity theft] is a real-life issue, and, of

that “[a]t this point and given the risks associated with having any kind of private information out on the internet, [redaction] has really become routine [and] I think obvious relief.” *Id.* at 25:13–16. Similarly, in *Clover Technologies*, Judge Owens overruled the U.S. Trustee’s objection, noting that:

[t]o me it is common sense. I don’t need evidence that there is, at best, a risk of identity theft and worse a risk of personal injury from listing someone’s name and address on the internet by way of the court’s electronic case filing system and, of course, the claims agent’s website The court can completely avoid contributing to the risk by redacting the addresses. And while there is, of course, an important right of access we routinely redact sensitive and confidential information for corporate entities and redact individual’s home addresses.

Hr’g Tr. at 24:21-25, 25:9-10, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO) (Bankr. D. Del. Jan. 22, 2020) [Docket No. 146]. And, in *Forever 21*, in overruling the U.S. Trustee’s objection, Judge Gross found that “[w]e live in a new age in which the theft of personal identification is a real risk, as is injury to persons who, for personal reasons, seek to have their addresses withheld.” Hr’g Tr. at 60:22–25, *In re Forever 21, Inc.*, No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019) [Docket No. 605].

26. For these reasons, the Debtors respectfully submit that cause exists to authorize the Debtors to seal, pursuant to 11 U.S.C. § 107(c)(1) and in compliance with the CCPA, personally identifiable information—including email addresses and home addresses—listed on the Consolidated Creditor Matrix, Consolidated Top 30 Creditors List, or any other document filed

course, the issue of domestic violence is extremely important.” Hr’g Tr. at 48:20–22, 49:3–5, *In re Anna Holdings*, No. 19-12551 (CSS) (Bankr. D. Del. Dec. 3, 2019) [Docket No. 112].

Notably, Judge Sontchi acknowledged that “the world is very different from [the 1980s] when you and I started practice with the problems of identity theft” and that his perspective had evolved in that he was not previously aware of “the dangers with this kind of information becoming public.” *See* Hr’g Tr. at 45:25-46:2, 47:22–24. The Debtors reserve the right to supplement the record with respect to such risks insofar as they are not self-evident in this instance.

with this Court. Absent such relief, the Debtors would unnecessarily render individuals more susceptible to identity theft and could jeopardize the safety of individuals by publishing their home addresses.

COMPLIANCE WITH LOCAL RULE 9018-1(d)(iv)

27. Under the circumstances, and given the nature of the relief requested herein, the Debtors have not been able to confer with the individuals whose information is requested to be sealed and, accordingly, the Debtors submit that there is cause to excuse the Debtors from the meet and confer obligations under Local Rule 9018-1(d).

NOTICE

28. The Debtors will provide notice of this Motion to: (a) United States Trustee for the District of Delaware; (b) the United States Attorney's Office for the District of Delaware; (c) the state attorneys general for all states in which the Debtors conduct business; (d) the Internal Revenue Service; (e) the United States Securities and Exchange Commission; (f) the holders of the thirty (30) largest unsecured claims against the Debtors on a consolidated basis; (g) counsel to the DIP Agent and DIP Lender; (h) counsel to the Prepetition Agent; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors respectfully submit that, in light of the nature of the relief requested, no further notice is necessary.

CONCLUSION

WHEREFORE the Debtors respectfully request entry of the Order, substantially in the form attached hereto as **Exhibit A**, respectively, granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: February 26, 2025
Wilmington, Delaware

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Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Proposed Form of Order

**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 (xxx)

(Joint Administration Pending)

Related Docket No.

**ORDER (I) AUTHORIZING DEBTORS TO FILE A
CONSOLIDATED (A) CREDITOR MATRIX AND (B) TOP 30 CREDITORS
LIST, (II) AUTHORIZING REDACTION OF CERTAIN PERSONAL
IDENTIFICATION INFORMATION, AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the Debtors for entry of an order (the “Order”)
(i) authorizing the Debtors to file (a) the Consolidated Creditor Matrix and (b) the Consolidated
Top 30 Creditors List, (ii) authorizing the Debtors to redact certain personal identification
information, and (iii) granting related relief, all as more fully set forth in the Motion; and this Court
having reviewed the Motion and the First Day Declaration; and this Court having jurisdiction to
consider the Motion and the relief requested therein in accordance with 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; and this Court having found that this is a core proceeding
pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article
III of the United States Constitution; and this Court having found that venue of this proceeding
and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Dynamic Aerostructures LLC (3076); Dynamic Aerostructures Intermediate LLC (9800); and Forrest Machining LLC (3421). The Debtors’ service address is 27756 Avenue Mentry, Valencia, California 91355.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted, as set forth herein.
2. The Debtors are authorized to submit the Consolidated Creditor Matrix. The requirements of section 521(a)(1)(A) of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1), and Local Rules 1007-2(a) and 2002-1(f)(v) that separate mailing matrices and lists of creditors be submitted for each Debtor are waived; provided, however, if any of these Chapter 11 Cases convert to a case under Chapter 7 of the Bankruptcy Code, the applicable Debtor shall file its' own creditor mailing matrix.
3. The Debtors are authorized to file the Consolidated Top 30 Creditors List in lieu of each Debtor filing a list of its twenty (20) largest unsecured creditors.
4. The Debtors are authorized to redact the home addresses and email addresses of the Debtors' directors, employees, individual equity holders, and creditors who are natural persons from the Consolidated Creditor Matrix, the Consolidated Top 30 Creditors List, the Debtors' Schedules and Statements, and affidavits of service filed with the Court in these chapter 11 cases; *provided, that* the Debtors shall file unredacted versions of all such documents under seal with the Court, and shall provide an unredacted version of the Consolidated Top 30 Creditors List, the

Schedules and Statements, and (if requested) affidavits of service to the U.S. Trustee, any official committee of unsecured creditors appointed in these chapter 11 cases, the Debtors' claims and noticing agent, the DIP Agent and any party in interest, upon reasonable request related to these chapter 11 cases. The Debtors shall provide an unredacted version of the Consolidated Creditor Matrix to the Debtors' claims and noticing agent, and, only upon request, on the U.S. Trustee, any official committee of unsecured creditors appointed in these chapter 11 cases, and any party in interest (upon reasonable request related to the Chapter 11 Cases); *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request unless otherwise required to be disclosed by law or court order.

5. When serving any notice in these cases on the Debtors' directors, employees, equity holders, and creditors who are natural persons, the Debtors' claims and noticing agent, and, where applicable, the Clerk of the Court, shall use the address the Debtors have on file for such natural person, which shall not be any of the Debtors' mailing addresses.

6. The Debtors, through their claims and noticing agent, are authorized to serve all pleadings and papers on all parties listed on the Consolidated Creditor Matrix.

7. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any natural person solely because such natural person's personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon natural persons whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service. The Debtors shall provide the personally identifiable information to any party in interest that files a motion that indicates the reason such information is needed and that, after notice and a hearing, is granted by this Court. Alternatively, the Debtors are authorized to facilitate service of process

through the Debtors' claims and noticing agent for any party in interest required to serve a creditor whose information has been redacted pursuant to this Order and arrange for reimbursement of expenses on account of such service with said party in interest.

8. The Debtors are hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

9. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.