

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re:

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

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. 73

**SUPPLEMENTAL DECLARATION OF MARK L. DESGROSSEILLIERS IN SUPPORT  
OF 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**

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

1. I am a partner in the law firm of Chipman Brown Cicero & Cole, LLP (“CBCC”), which maintains its principal office at Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801. CBCC also maintains an office in New York, New York. I submit this declaration (the “**Supplemental Declaration**”) on behalf of CBCC in support of the application [Docket No. 73] (the “**Application**”),<sup>2</sup> of the Debtors for an order, pursuant to Bankruptcy Code sections 327(a), 328(a), and 1107(b), Bankruptcy Rules 2014(a), 2016(b), and 5002, and Local Rule 2014-1, authorizing the retention and employment of CBCC as co-counsel to the Debtors in these Chapter 11 Cases effective as of the Petition Date, filed in the above-captioned bankruptcy cases (the “**Bankruptcy Cases**”). I submit this Supplemental Declaration in the cases of the above-captioned Debtors to supplement the disclosures set forth in my original

<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> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.



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declaration (the “**Original Declaration**”) filed with the Application on March 4, 2025 [Docket No. 73]. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.<sup>3</sup>

2. As more fully described in the Original Declaration, CBCC maintains a computer client database (the “**Client Database**”) containing the names of all of CBCC’s current and former clients and, where practical, the known affiliates of those clients. In connection with preparing this Supplemental Declaration, I caused to be submitted to, and caused to be checked against, the Client Database, any remaining Potentially Interested Parties in these cases listed in Exhibit 1 to the Initial Declaration, which party names were provided to CBCC by the Debtors (collectively, the “**Potentially Interested Parties**”).<sup>4</sup> CBCC compared the names of the Potentially Interested Parties against the Client Database. Based upon my review of the Potentially Interested Parties and the report from CBCC’s Client Database, I have determined that CBCC has or had a relationship with certain Potentially Interested Parties as identified in CBCC’s conflict check and disclosed on **Exhibit 2** to the Original Declaration (the “**Potentially Interested Parties List**”).

3. The Boeing Company (“**Boeing**”) was identified on the Potentially Interested Parties List. CBCC formerly represented Boeing from 9/2020 – 9/2021 in a bankruptcy case in Delaware. Billings accounted for less than .02% of total revenue in each year for the firm for this client. CRG Financial, LLC (“**CRG**”) was a former client of CBCC in unrelated Delaware bankruptcy cases in each of 2019 (1 case – 1.33% of total revenue), 2022 (1 case .035%), 2023 (2 cases - 0.02%), and 2024 (2 cases – 0.07%). CBCC currently represents CRG in one unrelated

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<sup>3</sup> Certain of the disclosures herein relate to matters within the knowledge of other attorneys at CBCC.

<sup>4</sup> As of the filing of the Application, CBCC had not yet completed its comparison of all of the Potentially Interested Parties against the Client Database. CBCC has now completed its analysis and this Supplemental Declaration reflects all known connections between CBCC and the Potentially Interested Parties.

Delaware bankruptcy case (I would expect only de minimis billings in connection with such ongoing representation (currently \$0.00)).

4. CBCC does not believe that the supplemental disclosures above impact its disinterestedness. CBCC continues to reserve the right to supplement CBCC's disclosures in the event that CBCC learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, CBCC will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my information, knowledge, and belief.

Executed on March 19, 2025

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