

**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)

Related Docket Nos. 81, 82, 137

**CERTIFICATION OF COUNSEL REGARDING MOTION FOR ENTRY OF ORDER
APPROVING SETTLEMENT WITH NORTHROP GRUMMAN SYSTEMS
CORPORATION**

The undersigned counsel for the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On March 4, 2025, the Debtors filed the *Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation* [Docket No. 82] (the “**Motion**”).
2. Pursuant to the notice of Motion, the deadline to file objections regarding the relief requested in the Motion was set for March 18, 2025, at 4:00 p.m. (Eastern Time).
3. Prior to the Objection Deadline, the Debtors received comments from the United States Trustee (the “**U.S. Trustee**”). To address those comments, the Debtors made revisions to the proposed form of order filed with the Motion and also filed a declaration in support of the Motion (Docket No. 137).
4. The revised form of order (the “**Revised Order**”), attached hereto as **Exhibit A**, which reflects changes in response to the comments received. The Revised Order has been reviewed by counsel to the U.S. Trustee and is acceptable to the U.S. Trustee.

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.



5. Attached as **Exhibit B** is a blackline of the Revised Order against the order filed with the Motion.

WHEREFORE, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: March 20, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

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

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

Telephone: (302) 295-0192

weber@chipmanbrown.com

desgross@chipmanbrown.com

-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

-and-

ROPES & GRAY LLP

Gregg M. Galardi (No. 2991)

1211 Avenue of the Americas

New York, New York 10036

Telephone: (212) 596-9000

Facsimile: (212) 596-9090

gregg.galardi@ropesgray.com

Proposed Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Order

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

In re: Dynamic Aerostructures LLC, <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 25-10292 (LSS) (Jointly Administered) Related Docket Nos. 81, 82, 137
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**ORDER APPROVING SETTLEMENT WITH
NORTHROP GRUMMAN SYSTEMS CORPORATION**

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors-in-possession (the “**Debtors**”) for entry of an order (this “**Order**”) pursuant to section 105(a), 363, and 365 of title 11 of the United States Code of the Bankruptcy Code and Bankruptcy Rule 9019 approving the NGSC Settlement, including the Consent and Term Sheet, all as more fully set forth in and attached to the Motion; and this Court having jurisdiction over this matter pursuant to 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 this Court having found that venue of this case and this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court 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

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

Motion and having heard the statements in support of the relief requested therein at a hearing before this Court if needed (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. Any objections or reservations of rights filed in respect of the Motion are overruled with prejudice.
2. The Debtors are authorized to execute and perform under the NGSC Settlement, including the Consent and Term Sheet.
3. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Motion.
4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT B

Redline 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 (LSS)

(Jointly Administered)

Related Docket ~~No~~Nos. [81](#), [82](#), [137](#)

**ORDER APPROVING SETTLEMENT WITH
NORTHROP GRUMMAN SYSTEMS CORPORATION**

Upon the motion (the “**Motion**”)² of the above-captioned debtors and debtors-in-possession (the “**Debtors**”) for entry of an order (this “**Order**”) pursuant to section 105(a), 363, and 365 of title 11 of the United States Code of the Bankruptcy Code and Bankruptcy Rule 9019 approving the NGSC Settlement, including the Consent and Term Sheet, all as more fully set forth in and attached to the Motion; and this Court having jurisdiction over this matter pursuant to 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 this Court having found that venue of this case and this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and

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

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 if needed (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. Any objections or reservations of rights filed in respect of the Motion are overruled with prejudice.

2. The Debtors are authorized to execute and perform under the NGSC Settlement, including the Consent and Term Sheet, ~~is **APPROVED** in its entirety.~~

3. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order in accordance with the Motion.

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

Document comparison by Workshare Compare on Thursday, March 20, 2025
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Document 1 ID	netdocuments://4901-7202-8204/1
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Document 2 ID	netdocuments://4901-7202-8204/2
Description	FMI - 9019 Order Northrop Grumman
Rendering set	Standard

Legend:	
Insertion	
Deletion	
Moved from	
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Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

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Moved to	0
Style changes	0
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Total changes	6