

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

In re:	:	Chapter 11
	:	Case No. 25-10292 (LSS)
Dynamic Aerostructures LLC, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	<u>Objection Deadline: Jun. 19, 2025 at 4:00 p.m. (ET)</u>
	:	

**SECOND MONTHLY APPLICATION OF BERKELEY RESEARCH GROUP, LLC FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE DEBTORS DURING THE
PERIOD FROM APRIL 1, 2025 THROUGH APRIL 30, 2025**

Name of Applicant:	Berkeley Research Group, LLC (“ <u>BRG</u> ”)
Authorized to Provide Professional Services to:	The debtors and debtors-in-possession (the “ <u>Debtors</u> ”)
Date of Retention:	March 21, 2025 effective as of February 26, 2025
Period for which compensation and reimbursement is sought:	April 1, 2025 through April 30, 2025
Amount of compensation sought as actual, reasonable and necessary:	\$200,437.20 (80% of \$250,546.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is an:	<u> X </u> monthly <u> </u> interim <u> </u> final application

The total time expended for fee application preparation is approximately 36.1 hours and the corresponding compensation requested is approximately \$12,494.50.

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.



Attachment A - Prior Applications Filed:

<i>Application</i>		<i>Requested</i>			<i>Paid to Date</i>		<i>Total Unpaid</i>	
Dt Filed	Dkt No	Period	Fees	Expenses	CNO/ Order	Fees	Expenses	Fees and Expenses
4/17/2025		2/26/2025-			5/9/2025			
Dkt No. 214		3/31/2025	\$ 410,352.00	\$ -	Dkt No. 238	\$ 328,281.60	\$ -	\$ 82,070.40
Total			\$ 410,352.00	\$ -		\$ 328,281.60	\$ -	\$ 82,070.40

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In re: Dynamic Aerostructures LLC, et al.



Attachment B: Fees By Professional

Berkeley Research Group, LLC

For the Period 4/1/2025 through 4/30/2025

Professional	Title	Billing Rate	Hours	Fees
B. Butler	Managing Director	\$1,140.00	89.4	\$101,916.00
J. Racy	Senior Managing Consultant	\$835.00	113.5	\$94,772.50
B. Kraemer	Associate	\$445.00	99.1	\$44,099.50
M. Haverkamp	Case Manager	\$395.00	15.0	\$5,925.00
E. Degnan	Case Assistant	\$205.00	18.7	\$3,833.50
Total			335.7	\$250,546.50
Blended Rate				\$746.34

In re: Dynamic Aerostructures LLC, et al.



Attachment C: Fees By Task Code

Berkeley Research Group, LLC

For the Period 4/1/2025 through 4/30/2025

Task Code	Hours	Fees
01. Asset Acquisition/ Disposition	38.4	\$34,816.50
05. Professional Retention/ Fee Application Preparation	36.1	\$12,494.50
06. Attend Hearings/ Related Activities	1.0	\$987.50
07. Interaction/ Meetings with Debtors/ Counsel	25.0	\$25,206.00
08. Interaction/ Meetings with Creditors/ Counsel	3.7	\$4,035.00
14. Executory Contracts/ Leases	3.2	\$1,775.00
18. Operating and Other Reports	35.5	\$26,700.50
19. Cash Flow/Cash Management/ Liquidity	91.5	\$73,041.50
36. Operation Management	56.3	\$36,198.50
37. Vendor Management	45.0	\$35,291.50
Total	335.7	\$250,546.50
Blended Rate		\$746.34

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**SECOND MONTHLY APPLICATION OF BERKELEY RESEARCH GROUP, LLC FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE DEBTORS DURING THE
PERIOD FROM APRIL 1, 2025 THROUGH APRIL 30, 2025**

Berkeley Research Group, LLC (“BRG”), financial advisor to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), hereby submits its second monthly fee application (the “Application”) for an order pursuant to sections 105(a), 330 and 331 chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court of the District of Delaware (the “Local Rules”), the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”), entered March 20, 2025, and the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330, effective January 30, 1996 (the “U.S. Trustee Guidelines”) seeking (a) the allowance of reasonable compensation for professional services rendered by BRG to the Debtors during the period April 1, 2025 through April 30, 2025 (the “Fee Period”) and (b) reimbursement of actual and necessary charges and disbursements

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.

incurred by BRG during the Fee Period in the rendition of required professional services on behalf of the Debtors. In support of this Application, BRG represents as follows:

JURISDICTION

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over the Application 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 as of February 29, 2012. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final order by the Court in connection with this Application to the extent that 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 statutory bases for the relief requested herein are sections 105(a), 330, 331, and 503(b) of the Bankruptcy Code and Bankruptcy Rule 2016 and Local Rule 2016.

BACKGROUND

3. On February 26, 2025 (the “Petition Date”), each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code with the Court. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The cases are being jointly administered pursuant to Bankruptcy Rule 1015(b). No trustee or examiner has been appointed in these cases.

4. On the Petition Date, the Debtors selected BRG to serve as its financial advisor. The Debtors have also selected Ropes & Gray LLP (“Ropes & Gray” or “R&G”) and Chipman Brown Cicero & Cole, LLP (“Chipman” and together with R&G “Counsel”) to serve as its counsel and Configure Partners, LLC and Configure Partners Securities, LLC (collectively, “Configure”)

to serve as its investment banker. On March 21, 2025, this Court entered an order authorizing the retention of BRG as financial advisor to the Debtors effective as of the Petition Date.

FEE PROCEDURES ORDER

5. On March 20, 2025, this Court signed the Interim Compensation Order. Pursuant to the Interim Compensation Order, on or about the fifteenth (15) day of each full calendar month following the month for which compensation and reimbursement is sought (the “Compensation Period”), each Professional seeking interim monthly allowance of its fees and expenses may file an application with the Court (each a “Monthly Fee Application”) pursuant to section 331 of the Bankruptcy Code for interim approval and allowance of compensation for services rendered and reimbursement of expenses during the Compensation Period. Each Notice Party shall have twenty-one (21) days after service of a Monthly Fee Application to object to the requested fees and expenses (the “Objection Deadline”). Upon the expiration of the Objection Deadline: (i) if no objections have been filed, the Professional may file a certificate of no objection and the Debtors shall then be authorized to pay such Professional an amount (the “Actual Monthly Payment”) equal to the lesser of (i) eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Monthly Fee Application (the “Maximum Monthly Payment”) or (ii) eighty percent (80%) of the fees and one hundred percent (100%) of the expenses not subject to an objection.

SUMMARY OF SERVICES RENDERED

6. BRG is a global strategic advisory and expert consulting firm that provides independent expert testimony, litigation and regulatory support, authoritative studies, strategic advice, advisory services relating to restructuring and turnaround situations, due diligence, valuation, and capital markets, and document and data analytics to major law firms, businesses, including Fortune 500 corporations, government agencies, and regulatory bodies around the world.

7. Since being retained by the Debtors, BRG has rendered professional services to the Debtors as requested and as necessary and appropriate in furtherance of the interests of the Debtors' estates. BRG respectfully submits that the professional services that it rendered on behalf of the Debtors were necessary and have directly benefited the estates and have contributed to the effective administration of these cases.

8. BRG submits that the interim fees applied for herein for professional services rendered in performing services for the Debtors in this proceeding are fair and reasonable in view of the time spent, the extent of work performed, the nature of the Debtors' capitalization structure and financial condition, the Debtors' financial accounting resources and the results obtained. BRG's fees typically are based on the actual hours charged at BRG's standard hourly rates, which are in effect when the services are rendered.

9. BRG expended an aggregate of 335.7 hours, substantially all of which was expended by the professional staff of BRG. The work involved, and thus the time expended, was carefully assigned in light of the experience and expertise required for a particular task. The assigned staff was utilized to optimize efficiencies and avoid redundant efforts.

10. BRG's approach is to utilize senior, experienced personnel to create efficiencies in time spent reviewing and minimize total cost. In addition, BRG's hourly rates for professionals of comparable experience are at or below those of firms we consider our peers. We believe that the compensation in this Application is based on the customary compensation charges by comparably skilled professionals in cases other than under Title 11.

11. BRG believes that there has been no duplication of services between BRG and any other consultants or accountants to the bankruptcy estate.

12. No agreement or understanding exists between BRG and any other person for the sharing of compensation received or to be received for services rendered in connection with the chapter 11 cases, except for internal agreements among employees and independent contractors of BRG regarding the sharing of revenue or compensation. Neither BRG nor any of its employees or independent contractors has entered into an agreement or understanding to share compensation with any entity as described in Bankruptcy Code section 504 and Bankruptcy Rule 2016.

13. BRG, in accordance with the Bankruptcy Rules and the Local Rules, charges travel time at 50% of the time incurred.

14. BRG's time records for the Fee Period are attached hereto as **Exhibit A**. These records include daily time logs describing the time spent by each BRG professional and administrative-level person in these cases.

15. BRG also maintains records of all actual and necessary out-of-pocket expenses incurred in connection with the rendition of its professional services. At this time BRG is not requesting reimbursement for any expenses incurred during the Fee Period but reserves the right to request reimbursement therefor in the future.

16. The general summary of the services rendered by BRG during the Fee Period based on tasks and number of hours is set forth below.

Asset Acquisition/ Disposition – Task Code 01

17. Time charged to this code relates to BRG's support and evaluation of the sale process, including bidder diligence and APA schedule inputs. Specific work performed included (i) reviewing and revising numerous drafts of APA net working capital adjustment calculations; (ii) creating and updating a summary funds flow reflecting gross and net transaction proceeds; and (iii) meeting and corresponding with the Debtors, Counsel, Configure, and the buyer regarding working capital adjustments, sale closing considerations and work streams and next steps.

18. BRG has expended 38.4 hours on this category for a fee of \$34,816.50.

Professional Retention/ Fee Application Preparation – Task Code 05

19. Time charged to this code relates to the preparing and editing of BRG's combined February/March fee application and reviewing anticipated final fee application timing and next steps.

20. BRG has expended 36.1 hours on this category for a fee of \$12,494.50.

Attend Hearings/ Related Activities – Task Code 06

21. Time charged to this code relates to BRG's virtual attendance at the asset sale hearing.

22. BRG has expended 1.0 hours on this category for a fee of \$987.50.

Interaction/Meetings with Debtors/ Counsel – Task Code 07

23. Time charged to this task code relates to BRG's preparation for and participation in meetings/calls and correspondence with the Debtors, their senior management, Counsel, and other professionals retained by the Debtors regarding various case matters. Specific topics included but were not limited to weekly payments, APA net working capital adjustment, sale funds flow, sale closing, bank account management, contract cure calculations, post-sale wind down budget, liquidity outlook, recoveries, professional fees, shipment forecasts, vendor management, case dismissal, governance considerations, and other case matters.

24. BRG has expended 25.0 hours on this category for a fee of \$25,206.00.

Interaction/Meetings with Creditors/ Counsel – Task Code 08

25. Time charged to this code relates to time spent on meetings and other correspondence with the DIP lender and their counsel, the US. Trustee, and other interested parties regarding the Section 341 creditors meeting, sale closing and related funds flow, revised contract cures, wire transfer dollar limit issues, professional fees invoices, and general case updates.

26. BRG has expended 3.7 hours on this category for a fee of \$4,035.00.

Executory Contrasts/Leases – Task Code 14

27. Time charged to this code primarily pertains to BRG's efforts related to summarizing contract cure payments, including those for vendors, and meeting with the Debtor regarding the same.

28. BRG has expended 3.2 hours on this category for a fee of \$1,775.00.

Operating and Other Reports – Task Code 18

29. Time charged to this task code primarily pertains to BRG's developing and reviewing the multiple drafts of the March Monthly Operating Reports ("MORs") for all of the entities as well as reviewing the Debtors' inputs for these reports, including balance sheets and income statements, revising the Monthly Operating Reports to address comments from various parties, and meeting with the Debtors regarding the balance sheets for the MOR and to review the MOR.

30. BRG has expended 35.5 hours on this category for a fee of \$26,700.50.

Cash Flow/Cash Management/ Liquidity – Task Code 19

31. This task code relates to time spent by BRG during the Fee Period analyzing and reporting on matters impacting the Debtors' cash management and overall liquidity. Specific tasks included, but were not limited to (i) preparing and reviewing weekly cash flow and DIP budget variance reports, including related commentary; (ii) reviewing the Debtors' actual cash flow results as compared to the DIP financing budget; (iii) developing wind down budget assumptions for post asset sale; (iv) updating wind down budget reflecting cash flow actuals; (v) reviewing daily cash and payments detail provided by the Debtors; (vi) updating full case budget to actual cash flow and variance analysis; (vii) producing a daily analysis for all cash transactions in the BMO account post sale; and (viii) creating a new post sale close template for daily BMO bank cash reporting.

32. BRG has expended 91.5 hours on this category for a fee of \$73,041.50.

Operation Management – Task Code 36

33. Time charged to this code relates to BRG's support of the Debtors' ongoing operations, including analyzing accounts payable and receivable, assessing trade balances and cure costs, and reviewing other operational matters. Specifically, time was devoted to (i) updating cash flow actuals tracker with disbursements; (ii) calculating and reviewing net distributions to Avem based on receipts and disbursements; (iii) reviewing weekly disbursements; (iv) analyzing list of outstanding checks including reconciling cleared checks; (v) summarizing lender professional invoices and producing a related schedule of fees; (vi) calculating the UST fees; (vii) preparing a list of wind down action items; and (viii) corresponding with the Debtors and various other parties in interest regarding adequate insurance payments, escrow account cash balances, remitting payments, and sale closing wire transfers.

34. BRG has expended 56.3 hours on this category for a fee of \$36,198.50.

Vendor Management – Task Code 37

35. Time charged to this task code relates to BRG's management of vendor disbursements and service continuity. Specific tasks included, but were not limited to: (i) creating a tracker for pre-petition payments for critical vendors; (ii) creating a schedule and summary of weekly critical vendor payments; (iii) analyzing critical vendor accruals; (iv) creating summary of 503b(9) payments; (v) updating schedule of professional fee escrow account and fee application tracker; (vi) reviewing invoices for certain periods; (vii) reviewing draft CRO retention agreements; and (viii) meeting with the Debtors regarding critical vendor, 503b(9), and professional fee payments, payment forecasting, sale closing, and next steps.

36. BRG has expended 45.0 hours on this category for a fee of \$35,291.50.

ACTUAL AND NECESSARY EXPENSES

37. BRG incurred no actual out-of-pocket expenses in connection with the rendition of the professional services to the Debtors as summarized above.

38. Disbursements and expenses are incurred in accordance with BRG's normal practice of charging clients for expenses clearly related to and required by particular matters. Such expenses are often incurred to enable BRG to devote time beyond normal office hours to matters, which imposed extraordinary time demands. BRG has endeavored to minimize these expenses to the fullest extent possible.

39. BRG's billing rates do not include charges for photocopying, telephone and facsimile charges, computerized research, travel expenses, "working meals," secretarial overtime, postage, and certain other office services, because the needs of each client for such services differ. BRG believes that it is fairest to charge each client only for the services actually used in performing services for such client. BRG has endeavored to minimize these expenses to the fullest extent possible.

40. In providing a reimbursable service such as copying or telephone, BRG does not make a profit on that service. In charging for a particular service, BRG does not include in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment or capital outlay. In seeking reimbursement for service which BRG justifiably purchased or contracted for from a third party, BRG requests reimbursement only for the amount billed to BRG by such third party vendor and paid by BRG to that vendor.

NOTICE AND NO PRIOR APPLICATION

41. Notice of this application has been given to (a) the Debtors; (b) Counsel to the Debtors (c) counsel to the DIP lender; and (d) the Office of the U.S. Trustee for the District of

Delaware (collectively the “Notice Parties”). In light of the nature of the relief requested herein, BRG submits that no further or other notice is required.

42. With respect to these amounts, as of the date of the Application, BRG has received no payments, and no previous application for the relief sought herein has been made to this or any other Court.

WHEREFORE, BRG respectfully requests: (a) that it be allowed on an interim basis (i) fees in the amount of \$250,546.50 for reasonable, actual and necessary services rendered by it on behalf of the Debtors during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual, and necessary expenses incurred during the Fee Period; (b) that the Debtors be authorized and directed to immediately pay to BRG the amount of \$200,437.20 which is equal to the sum of 80% of BRG’s fees; and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: 5/29/2025
Atlanta, GA

BERKELEY RESEARCH GROUP, LLC

/s/ Robert Butler
Robert Butler
Managing Director
3350 Riverwood Parkway
Suite 2105
Atlanta, GA 30339
678-575-4864

Financial Advisor to the Debtors

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

In re:	:	Chapter 11
	:	Case No. 25-10292 (LSS)
Dynamic Aerostructures LLC, <i>et al.</i> , ¹	:	(Jointly Administered)
	:	
Debtors.	:	<u>Objection Deadline:</u> Jun. 19, 2025 at 4:00 p.m. (ET)
	:	

VERIFICATION

Robert Butler, pursuant to 28 U.S.C. § 1746, declares as follows:

- a) I am a Managing Director at the applicant firm, Berkeley Research Group, LLC (“BRG”), and am authorized to submit this verification on behalf of BRG.
- b) I have personally performed or supervised many of the professional services rendered by BRG as financial advisor to the Debtors and am familiar with the work performed on behalf of the Debtors by the professionals and other persons in the firm.
- c) I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.
- d) All services for which compensation is requested by BRG were professional services performed for and on behalf of the Debtors and not on behalf of any other person.

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.

e) I have reviewed the requirements of Local Rule 2016-1 and certify to the best of my information, knowledge, and belief that this application complies with Local Rule 2016-1.

Executed on 5/29/2025

/s/ Robert Butler

Robert Butler

In re: Dynamic Aerostructures LLC, et al.

**Exhibit A: Time Detail****Berkeley Research Group, LLC**

For the Period 4/1/2025 through 4/30/2025

Date	Professional	Hours	Description
01. Asset Acquisition/ Disposition			
4/1/2025	J. Racy	2.2	Reviewed summary of net working capital for week ended 3/30/25.
4/1/2025	B. Butler	0.6	Reviewed BRG report on APA net working capital adjustment calculations trend analysis from 12–31-24 through 3–31-25.
4/4/2025	B. Butler	0.5	Reviewed draft APA net working capital adjustment calculation as of 4–4-25.
4/7/2025	J. Racy	2.6	Created a summary funds flow reflecting gross and net transaction proceeds for sale closing.
4/7/2025	J. Racy	2.4	Updated summary funds flow reflecting gross and net transaction proceeds for sale closing.
4/7/2025	B. Butler	1.4	Developed updated 4-11-25 funds flows analysis for assets sales close to Avem reflecting net working capital adjustment to purchase price and contract cures pay off and pay off to DIP financing lender CRG Financial.
4/7/2025	J. Racy	1.4	Reviewed summary of net working capital as of 4/4/25.
4/7/2025	B. Butler	0.8	Participated in call with Configure (R. Keenan) re: Avem sales closing on 4-11-25 work streams and next actions.
4/7/2025	B. Butler	0.8	Reviewed updated APA net working capital adjustment calculations and support as of 4-4-25.
4/8/2025	J. Racy	2.8	Updated sales closing funds flow analysis.
4/8/2025	B. Kraemer	1.6	Produced a refreshed net working capital summary based on the latest AR, AP, and inventory reports as of 4/4 provided by the Debtors.
4/8/2025	J. Racy	1.4	Reviewed net working capital analysis as of 4/4/25.
4/8/2025	B. Butler	0.8	Reviewed elements of CRG DIP financing loan pay down (fees, interest, new money advanced) in connection with 4-11-25 Avem assets sales closing.
4/8/2025	B. Butler	0.7	Reviewed Debtors' manufacturing facilities landlord contract cures (rent, property taxes) and proration for 4-11-25 sales closing payment.

Date	Professional	Hours	Description
01. Asset Acquisition/ Disposition			
4/8/2025	B. Butler	0.7	Reviewed draft BRG APA net working capital adjustment calculation report and support.
4/8/2025	B. Butler	0.4	Corresponded with Configure (R. Keenan, M. Guill) re: 4-11-25 sales closing considerations and work streams.
4/8/2025	B. Butler	0.4	Corresponded with DIP lender CRG counsel King & Spaulding (M. Fishel) re: 4-11-25 sales closing funds flow mechanics, other sales closing work streams.
4/8/2025	J. Racy	0.3	Participated in call with D. Egan (Chipman) to discuss comments on sale closing funds flow.
4/8/2025	B. Butler	0.1	Participated in second call with CFO S. Finley re: status of Avem assets sales closing actions.
4/9/2025	J. Racy	1.7	Updated net working capital report for the period ended 4/4/24.
4/9/2025	B. Butler	1.3	Reviewed revised draft BRG APA net working capital adjustment calculation and support report to be distributed to DIP lender CRG Financial and buyer Avem.
4/9/2025	B. Butler	1.2	Reviewed revised draft 4-11-25 sales closing funds flow prior to distribution to DIP financing lender, CRG financial, and counsel K&S.
4/9/2025	J. Racy	0.4	Updated sales close funds flow analysis.
4/9/2025	B. Butler	0.2	Corresponded with Chipman (D. Egan) re: revised APA net working capital adjustment calculation as of 4-4-25, APA requirements, next steps.
4/9/2025	J. Racy	0.2	Participated in meeting with CFO S. Finley to discuss escrow account funding and sales close funds flow.
4/9/2025	B. Butler	0.2	Participated in second call with CFO S. Finley re: 4-11-25 sales closing work streams, next actions.
4/9/2025	B. Butler	0.2	Participated in second call with King & Spaulding (M. Fishel), Chipman (D. Egan) re: sales closing work streams, next steps.
4/10/2025	B. Butler	2.1	Reviewed revised APA net working capital adjustment calculation and related support as of 4-10-25, which was final APA adjustment to buyer Avem purchase price to be utilized in 4-11-25 sales closing.
4/10/2025	J. Racy	2.1	Reviewed updated net working capital report as of 4/10/25 for use in final funds flow.
4/10/2025	B. Kraemer	1.9	Produced a refreshed net working capital summary based on the latest AR, AP, and inventory reports as of 4/10 provided by the Debtors.

Date	Professional	Hours	Description
01. Asset Acquisition/ Disposition			
4/10/2025	J. Racy	1.6	Updated sales close funds flow analysis.
4/10/2025	J. Racy	0.8	Reviewed final net working capital report through 4/10/24.
4/11/2025	J. Racy	1.4	Updated sales close funds flow to reflect revised net working capital adjustment.
4/11/2025	B. Butler	1.1	Finalized 4-11-25 sales closing funds flow to reflect APA acquisition escrow deposit release to FMI; Avem purchase price, net working capital adjustment wired to FMI; FMI payment of DIP borrowings, fees, interest; net lease contract cures paid.
4/11/2025	J. Racy	0.1	Participated in funds flow closing call with D. Kupetz (Troutman), S. Feener (Troutman), K. Watler (Avem).
Task Code Total Hours		38.4	
05. Professional Retention/ Fee Application Preparation			
4/7/2025	E. Degnan	2.9	Prepared February/March fee application.
4/7/2025	E. Degnan	1.2	Continued to prepare February/March fee application.
4/8/2025	E. Degnan	2.9	Prepared February/March fee application.
4/8/2025	M. Haverkamp	2.9	Prepared February/March fee application.
4/8/2025	B. Butler	0.3	Reviewed framework for first BRG fee application document for the period from 2–26-25 through 3–31-25.
4/8/2025	M. Haverkamp	0.1	Reviewed status and timing for February/March fee application.
4/9/2025	E. Degnan	2.9	Prepared February/March fee application.
4/9/2025	M. Haverkamp	2.1	Edited first monthly fee application.
4/9/2025	B. Butler	0.5	Reviewed updated framework for draft initial BRG fee application for the period from 2–26-25 through 3–31-25.
4/10/2025	E. Degnan	1.0	Prepared February/March fee application.
4/11/2025	E. Degnan	2.9	Prepared February/March fee application.
4/11/2025	E. Degnan	0.8	Continued to prepare February/March fee application.
4/14/2025	E. Degnan	2.2	Prepared February/March fee application.
4/14/2025	M. Haverkamp	1.8	Edited first monthly fee application.

Date	Professional	Hours	Description
05. Professional Retention/ Fee Application Preparation			
4/15/2025	M. Haverkamp	2.3	Edited first monthly fee application.
4/15/2025	B. Butler	0.7	Reviewed detail for inclusion in initial BRG fee application for the period from 2-26-25 through 3-31-25.
4/16/2025	M. Haverkamp	2.9	Edited FMI first monthly fee application.
4/16/2025	M. Haverkamp	2.0	Continued editing FMI first monthly fee application.
4/16/2025	E. Degnan	1.9	Prepared February/March fee application.
4/16/2025	B. Butler	0.9	Reviewed draft initial BRG fee application, including Butler declaration, for the period from 2-26-25 through 3-31-25.
4/17/2025	M. Haverkamp	0.6	Edited first monthly fee application
4/29/2025	M. Haverkamp	0.3	Reviewed anticipated final fee application timing and next steps.
Task Code Total Hours		36.1	
06. Attend Hearings/ Related Activities			
4/7/2025	J. Racy	0.5	Attended 4/7/25 sale hearing remotely.
4/7/2025	B. Butler	0.5	Participated in 4-7-25 Judge Silverstein Court sales hearing re: Debtors' assets sale to bidder Avem.
Task Code Total Hours		1.0	
07. Interaction/ Meetings with Debtors/ Counsel			
4/2/2025	B. Butler	0.4	Participated in call with CFO S. Finley re: vendor management, updated shipments forecast, BMO professional fees, post petition disbursements.
4/2/2025	J. Racy	0.4	Participated in call with CFO S. Finley to discuss revenue, shipments forecast, weekly collections, weekly payments, BMO professional fee and vendor management.
4/2/2025	J. Racy	0.3	Participated in call with CFO S. Finley to discuss planned critical vendor payments.
4/3/2025	J. Racy	0.1	Participated in call with CFO S. Finley to review critical vendor accruals and professional fee payments.
4/3/2025	B. Butler	0.1	Participated in third call with CFO S. Finley re: sales closing work streams, APA net working capital adjustment calculations, next actions.
4/7/2025	B. Butler	0.5	Participated in call with CFO S. Finley re: shipments receipts projection, vendor management, liquidity outlook, sales closing action steps.

Date	Professional	Hours	Description
07. Interaction/ Meetings with Debtors/ Counsel			
4/7/2025	J. Racy	0.5	Participated in call with CFO S. Finley to review net working capital, funds flow and receipts projections, liquidity outlook.
4/8/2025	B. Butler	1.0	Participated in call with CFO S. Finley re: vendor management, governance post sales closing, 4-11-25 sales closing plan.
4/8/2025	J. Racy	1.0	Participated in call with CFO S. Finley to discuss sales close funds flow, vendor management, governance post closing, sales and closing plan.
4/8/2025	J. Racy	0.4	Participated in call with CFO S. Finley to discuss receipts, payments and sales close funds flow.
4/8/2025	B. Butler	0.3	Participated in a portion of call with CFO S. Finley re: preparation of all upcoming Avem assets sales closing work streams, receipts, and payments.
4/9/2025	J. Racy	0.5	Participated in second call with CEO E. Ellis and CFO S. Finley to discuss escrow account funding, sales close funds flow, DIP lender CRG financial payoff at sales closing, latest APA net working capital revision, receipts forecast.
4/9/2025	B. Butler	0.5	Participated in second call with CEO E. Ellis, CFO S. Finley re: sales closing work streams, DIP lender CRG Financial payoff at sales closing, latest APA net working capital adjustment revision, revenue receipts forecast.
4/9/2025	B. Butler	0.4	Participated in fourth call with Chipman (D. Egan) re: wind down budget assumptions from sales closing through Chapter 11 case dismissal, governance effective after sales closing, other case matters.
4/9/2025	B. Butler	0.3	Participated in first call with CFO S. Finley re: Debtors' wire transfer limits and work around solutions to resolve prior to 4-11-25 sales closing, Debtors' governance post sales close, next steps.
4/9/2025	B. Butler	0.3	Participated in fourth call with CFO S. Finley re: 4-11-25 sales closing actions, contract cures calculations, APA net working capital adjustment update, funds flow payoff to CRG Financial.
4/9/2025	B. Butler	0.3	Participated in second call with Chipman (D. Egan) re: upcoming sales close payments, wire transfer limits and proposed solutions, plan and timing to release certain escrowed funds as result of sales closing.
4/9/2025	B. Butler	0.2	Participated in call with CEO E. Ellis, CFO S. Finley re: 4-11-25 asset sales closing work streams, vendor management, other case matters.
4/9/2025	B. Butler	0.1	Participated in first call with Chipman (D. Egan) re: 4-11-25 sales closing process, Debtors' governance post sales close through Chapter 11 case dismissal.
4/9/2025	B. Butler	0.1	Participated in third call with CFO S. Finley re: resolutions to wire transfer dollar limits prior to 4-11-25 sales closing.

Date	Professional	Hours	Description
07. Interaction/ Meetings with Debtors/ Counsel			
4/9/2025	B. Butler	0.1	Participated in third call with Chipman (D. Egan) re: latest update for resolution of BMO cash account daily wire transfer dollar amount limits and its potential impact on the 4-11-25 sales closing.
4/10/2025	J. Racy	1.4	Participated in call with CFO S. Finley on updated APA, contract cure calculations with landlord, vendor management, sales closing actions, post sale wind down governance and actions.
4/10/2025	B. Butler	1.4	Participated in call with CFO S. Finley re: updated APA net working capital adjustment at 4-10-25, contract cures calculations with landlord, vendor management, final plan for 4-11-25 sales closing actions, post sale wind down budget and governance.
4/10/2025	B. Butler	0.2	Participated in third call with Chipman (D. Egan) re: latest update to BMO cash account daily wire transfer dollar amount limitations, and potential resolution.
4/10/2025	J. Racy	0.1	Participated in call with D. Egan (Chipman) to discuss bank account management.
4/10/2025	B. Butler	0.1	Participated in first call with Chipman (D. Egan) re: BMO cash account daily wire transfer dollar limit considerations, 4-11-25 sales closing actions, other case matters.
4/10/2025	B. Butler	0.1	Participated in second call with Chipman (D. Egan) re: Debtors' governance post sales closing through Chapter 11 bankruptcy case dismissal.
4/11/2025	B. Butler	0.5	Participated in call with Configure (R. Keenan) re: increase in buyer Avem purchase price of FMI assets due to increased net working capital adjustment as of 4-10-25, latest contract cures adjustment to purchase price, next steps.
4/11/2025	B. Butler	0.4	Corresponded throughout day with Verita (K. Pscion), Chipman (D. Egan) re: incoming wire transfer from Verita escrow account holding buyer Avem APA deposit to be transferred into Debtors' BMO cash account as part of 4-11-25 sales closing.
4/11/2025	B. Butler	0.3	Participated in fifth call with former CFO S. Finley re: vendor management, liquidity outlook, wind down budget and governance considerations through bankruptcy case dismissal, other matters.
4/11/2025	J. Racy	0.2	Participated in call with former CFO S. Finley to discuss funds flow.
4/11/2025	J. Racy	0.2	Participated in call with R. Keenan (Configure) to discuss funds flow.
4/11/2025	B. Butler	0.2	Participated in third call with former CFO S. Finley re: status of receipt to FMI of buyer Avem purchase price wire transfer, other case matters, next steps.

Date	Professional	Hours	Description
07. Interaction/ Meetings with Debtors/ Counsel			
4/11/2025	J. Racy	0.1	Participated in additional call regarding funds flow with former CFO S. Finley.
4/11/2025	B. Butler	0.1	Participated in call with Chipman (D. Egan) re: wind down budget and FMI governance considerations post sales close through Chapter 11 bankruptcy case dismissal, next steps.
4/11/2025	B. Butler	0.1	Participated in call with Chipman (D. Egan), former CFO S. Finley re: confirmed latest status of 4-11-25 FMI assets sales close to buyer Avem, other case matters, next actions.
4/11/2025	B. Butler	0.1	Participated in first call with former CFO S. Finley re: updated revision to 4-11-25 sales closing funds flow to account for increased buyer Avem purchase price payable to FMI as a result of updated APA net working capital adjustment as of 4-10-25.
4/11/2025	B. Butler	0.1	Participated in fourth call with former CFO S. Finley re: updated status of receipt by FMI of buyer Avem purchase price wire transfer, next actions.
4/11/2025	B. Butler	0.1	Participated in second call with former CFO S. Finley re: confirmed effectiveness of FMI asset sales close to buyer Avem, next actions to execute all elements of the funds flow plan.
4/14/2025	B. Butler	1.5	Held call with former CFO S. Finley re: lease contract cure payment, bill back to buyer for assumed rent and property tax payments, buyer customer collections to be remitted net of payments made on behalf of buyer, critical vendor analysis and payments.
4/14/2025	J. Racy	1.5	Participated in call with former CFO S. Finley to discuss vendor payments, critical vendor payments, accounts payable and contract cures.
4/14/2025	B. Butler	0.3	Corresponded with former CFO S. Finley re: potential recovery elements to prepetition secured lender, other matters.
4/16/2025	B. Butler	0.7	Participated in call with former CFO re: critical vendor payment analysis, remaining case payments, buyer Avem receipts received by FMI offset by FMI payments on behalf of buyer, governance matters.
4/16/2025	J. Racy	0.7	Participated in call with former CFO S. Finley to review pre petition critical vendor payables and Avem disbursement through 4/15/25.
4/17/2025	J. Racy	0.2	Participated in call with former CFO S. Finley to discuss amounts for 4/18 Avem operational distribution.
4/18/2025	J. Racy	0.3	Participated in call with former CEO E. Ellis and former CFO S. Finley regarding wind down planning, critical vendor payments, bank account management and Avem weekly disbursement.

Date	Professional	Hours	Description
07. Interaction/ Meetings with Debtors/ Counsel			
4/18/2025	B. Butler	0.3	Participated in call with former CEO E. Ellis, former CFO S. Finley re: operations wind down status, case dismissal time frame, governance considerations, other matters.
4/18/2025	B. Butler	0.2	Participated in call with Chipman (D. Egan) BMO advisers adequate assurance payments status, wind down operations, activities, governance considerations.
4/21/2025	B. Butler	0.3	Participated in call with former CFO S. Finley re: remaining critical vendor payments, net buyer Avem receipts received by FMI/payments made by Debtors on buyer's behalf, 3-25 monthly operating reports, disbursement plan, other case matters.
4/21/2025	J. Racy	0.3	Participated in call with former CFO S. Finley to review MOR's, outstanding checks and Avem distributions.
4/22/2025	B. Butler	0.2	Participated in call with former CFO S. Finley re: cash disbursements control, buyer Avem receipts received by FMI/payments made by Debtors on buyers behalf, next actions.
4/22/2025	J. Racy	0.2	Participated in call with former CFO S. Finley to review March MOR's, net Avem distribution and cash control.
4/22/2025	J. Racy	0.2	Participated in call with former CFO S. Finley to review UST fee payment.
4/23/2025	J. Racy	0.3	Participated in call with former CFO S. Finley and former CEO E. Ellis to review UST Fees, net Avem distribution, cash control, landlord request and governance considerations.
4/23/2025	B. Butler	0.3	Participated in call with former CFO S. Finley re: UST Fees, net Avem distribution, cash control, landlord request and governance considerations.
4/24/2025	B. Butler	0.5	Participated in call with Chipman (D. Egan) re: draft CRO motion status, draft case dismissal motion update, wind down budget items through case dismissal and beyond, Southern California Edison utility deposit transfer, cash control.
4/24/2025	J. Racy	0.5	Participated in call with D. Egan (Chipman) to discuss draft CRO motion status, dismissal motion update, wind down budget items through case dismissal and beyond, SoCal Edison utility deposit and cash control.
4/24/2025	J. Racy	0.2	Participated in call with former CFO S. Finley to discuss status of utility escrow account refund, cash management and Avem distribution.
4/25/2025	B. Butler	0.7	Participated in call with former CFO S. Finley re: cash control, buyer Avem net receipts/disbursements, draft CRO motion status, draft case dismissal motion considerations, vendor management, 4-25 monthly operating reports, next actions.

Date	Professional	Hours	Description
07. Interaction/ Meetings with Debtors/ Counsel			
4/25/2025	J. Racy	0.5	Participated in a portion of call with former CFO S. Finley to discuss Avem distribution, case wind down.
4/28/2025	B. Butler	0.1	Participated in call with former CFO S. Finley re: control of Debtors' cash accounts and related processes, disbursements plan, accounting for buyer Avem receipts collected by FMI/payments by Debtors on behalf of buyer, other case matters.
4/28/2025	J. Racy	0.1	Participated in call with former CFO S. Finley to discuss cash control, Avem net receipts/disbursements, disbursements plan for current week.
4/29/2025	B. Butler	0.7	Reviewed draft motion to dismiss Debtors' Chapter 11 cases, establishing procedures for payments of final fee applications.
4/29/2025	J. Racy	0.6	Reviewed initial draft of motion to dismiss.
4/29/2025	B. Butler	0.1	Participated in call with former CFO S. Finley re: control of Debtors' cash accounts, accounting for buyer Avem customer receivable connections and vendor payments transactions, next steps.
Task Code Total Hours		25.0	
08. Interaction/ Meetings with Creditors/ Counsel			
4/1/2025	B. Butler	0.7	Participated in bankruptcy section 341 telephonic call with Debtors' creditors and UST R. Sierra-Fox, CEO E. Ellis, CFO S. Finley, Chipman (M. Desgrosseilliers, D. Egan).
4/1/2025	B. Butler	0.2	Corresponded with King & Spaulding (M. Fishel) re: sales closing work streams, DIP lender counsel professional fees invoices.
4/8/2025	B. Butler	0.3	Corresponded with DIP lender CRG's counsel King & Spaulding (M. Fishel) re: funds flow for 4-11-25 sales closing, pay off of DIP financing, next actions.
4/8/2025	B. Butler	0.3	Corresponded with King & Spaulding (M. Fishel), YCST (D. Enos) re: DIP financing lenders advisers professional actual fees through 3-31-25 and estimated professionals fees from 4-1-25 through 4-11-25 sales closing, other case matters.
4/8/2025	J. Racy	0.2	Participated in call with M. Fishel of King & Spaulding to discuss funds flow.
4/9/2025	B. Butler	0.4	Participated in call with CRG Financial (R. Axenrod), King & Spaulding (M. Fishel) re: finalization of Debtors' pay off amounts to CRG (new money advanced thus far, fees, interest) upon receipt of Avem assets sales proceeds at 4-11 closing.
4/9/2025	J. Racy	0.4	Participated in meeting with R. Axenrod (CRG) and M. Fishel (King & Spaulding) to discuss sales close funds flow.

Date	Professional	Hours	Description
08. Interaction/ Meetings with Creditors/ Counsel			
4/9/2025	B. Butler	0.3	Corresponded with BMO counsel Katten (M. Crocker), DIP lender counsel King & Spaulding (M. Fishel), Chipman (D. Egan) re: resolution of BMO cash account wire transfer dollar limits prior to 4-11-25 sales closing.
4/9/2025	B. Butler	0.2	Corresponded with DIP lender's counsel King & Spaulding (M. Fishel) re: funds flow to DIP lender CRG Financial from buyer Avem's sales proceeds at 4-11-25 sales closing.
4/9/2025	B. Butler	0.1	Participated in call with DIP lender's counsel King & Spaulding (M. Fishel) re: wire payment dollar limit issues and proposed solutions prior to 4-11-25 sales closing, next steps.
4/9/2025	B. Butler	0.1	Participated in call with King & Spaulding (M. Fishel), Chipman (D. Egan) re: BMO cash account wire transfer dollar limits issues and needed resolution before 4-11-25 sales closing.
4/11/2025	B. Butler	0.3	Corresponded with King & Spaulding (M. Fishel) re: final 4-11-25 sales closing funds flow reflecting increase in purchase price adjustment for net working capital at 4-10-25, revised contract cures to be paid by Debtors to landlord, other case matters.
4/11/2025	B. Butler	0.2	Participated in call with DIP financing lender CRG Financial's counsel King & Spaulding (M. Fishel) re: confirmation of effectiveness of FMI asset sales close to buyer Avem, status of related funds flow process, next actions.
Task Code Total Hours		3.7	
14. Executory Contracts/ Leases			
4/8/2025	B. Kraemer	0.8	Summarized the contract cure payments made and outstanding amounts owed to contract counter parties, as outlined in the contract cures order.
4/8/2025	J. Racy	0.1	Participated in call with CFO S. Finley to discuss contract cure payments.
4/10/2025	B. Kraemer	1.5	Created a table summarizing a vendor's contract cures, showing the itemized detail for the cures and the calculations informing the tax adjustment.
4/10/2025	J. Racy	0.8	Reviewed summary of contract cure payments.
Task Code Total Hours		3.2	
18. Operating and Other Reports			
4/1/2025	B. Butler	0.3	Reviewed elements of Debtors' Monthly Operating Report for 3-25.
4/15/2025	B. Butler	0.6	Reviewed 3-25 consolidated financial statements to be utilized in the preparation of the Debtors' 3-25 Monthly Operating Reports.

Date	Professional	Hours	Description
18. Operating and Other Reports			
4/16/2025	B. Kraemer	2.7	Prepared the March Monthly Operating Report due to the US Trustee for the Forrest Machining LLC entity.
4/16/2025	B. Kraemer	2.4	Continued to prepare the March Monthly Operating Report due to the US Trustee for the Forrest Machining LLC entity.
4/16/2025	J. Racy	1.0	Reviewed March financial statements provided by the Debtors in preparation for the March MOR.
4/16/2025	J. Racy	0.9	Reviewed draft version of March MOR's.
4/17/2025	B. Kraemer	2.9	Prepared the March Monthly Operating Report due to the US Trustee for the Forrest Machining LLC entity.
4/17/2025	J. Racy	2.6	Reviewed draft March MOR for the Dynamic Aerostructures LLC entity.
4/17/2025	J. Racy	2.6	Reviewed draft March MOR for the Forrest Machining LLC entity.
4/17/2025	B. Kraemer	2.2	Continued to prepare the March Monthly Operating Report due to the US Trustee for the Forrest Machining LLC entity.
4/17/2025	B. Kraemer	1.2	Prepared the March Monthly Operating Report due to the US Trustee for the Dynamic Aerostructures Intermediate LLC entity.
4/17/2025	B. Butler	1.2	Reviewed consolidated financial statements as of and for the month ended 3-31-25 to be included in the 3-25 Monthly Operating Report.
4/17/2025	J. Racy	1.2	Reviewed draft March MOR for the Dynamic Aerostructures Intermediate LLC entity.
4/17/2025	B. Kraemer	0.8	Prepared the March Monthly Operating Report due to the US Trustee for the Dynamic Aerostructures LLC entity.
4/17/2025	B. Butler	0.7	Reviewed Debtors' draft Monthly Operating Report as of and for the month ended 3-31-25.
4/17/2025	J. Racy	0.1	Participated in call with former CFO S. Finley to discuss balance sheet for March MOR's.
4/18/2025	B. Butler	2.2	Reviewed draft Debtors' Monthly Operating Report as of and for the month ended 3-31-25.
4/18/2025	J. Racy	1.1	Reviewed latest draft March MORs for the three Debtor entities.
4/21/2025	B. Butler	1.7	Reviewed draft Debtors' Monthly Operating Report as of and for the month ended 3-31-25.
4/21/2025	J. Racy	1.6	Reviewed March draft MOR's.

Date	Professional	Hours	Description
18. Operating and Other Reports			
4/21/2025	B. Kraemer	0.6	Created a table summarizing the detail of the "exceptional items" line on the Debtors' income statement, which is included in "other expenses" on the MOR supporting schedule.
4/21/2025	B. Kraemer	0.5	Revised the March MOR supporting schedule of payments made to insiders to include the insiders' payroll.
4/22/2025	J. Racy	1.2	Revised March MOR per comments from D. Egan of Chipman.
4/22/2025	B. Butler	0.9	Reviewed draft Monthly Operating Report as of and for the month ended 3-31-25.
4/22/2025	J. Racy	0.5	Reviewed March MOR.
4/22/2025	B. Kraemer	0.5	Revised the Forrest Machining LLC March MOR, based on comments provided by Counsel.
4/22/2025	J. Racy	0.1	Participated in call with D. Egan (Chipman) to review March MOR.
4/23/2025	J. Racy	0.8	Reviewed March MOR reports for all entities prior to submission.
4/23/2025	B. Butler	0.4	Reviewed to be filed final versions of each of the Debtors' Monthly Operating Report as of and for the month ended 3-31-25.
Task Code Total Hours		35.5	
19. Cash Flow/Cash Management/ Liquidity			
4/1/2025	J. Racy	2.1	Reviewed cash flow variance report for week ended 3/30/25.
4/1/2025	B. Butler	0.8	Reviewed Debtors' actual cash flow results through 3-30-25 as compared to the DIP financing budget for the same period.
4/1/2025	B. Kraemer	0.7	Revised the commentary on the variance report due to the DIP Lender for week ended 3/30, pursuant to the DIP Financing Interim Order.
4/2/2025	J. Racy	2.3	Reviewed cash flow variance report for week ended 3/30/25.
4/2/2025	B. Butler	0.9	Reviewed Debtors' actual cash flows for the period ended 3-30-25 as compared to the DIP financing budget.
4/2/2025	B. Butler	0.7	Developed wind down budget assumptions for the post sale close through Chapter 11 case dismissal period.
4/3/2025	J. Racy	1.6	Reviewed cash flow variance report for week ended 3/30/25.
4/3/2025	B. Butler	1.2	Developed wind down budget assumptions for the post asset sales close through projected case dismissal period.

Date	Professional	Hours	Description
19. Cash Flow/Cash Management/ Liquidity			
4/3/2025	B. Butler	0.6	Reviewed actual cash flow results through 3–30-25 as compared to DIP financing budget.
4/4/2025	B. Butler	1.1	Developed wind down budget assumptions for the post assets sales close through Chapter 11 case dismissal period.
4/4/2025	B. Butler	0.3	Reviewed daily cash receipts and payments through 4-3-25.
4/7/2025	J. Racy	1.3	Created initial draft of wind down budget for remainder of case.
4/7/2025	B. Butler	1.2	Developed updated Chapter 11 case wind down budget for the post assets sales closing through to the case dismissal.
4/7/2025	B. Butler	0.9	Reviewed actual cash flow results as compared to DIP financing budget through 4-6-25.
4/8/2025	J. Racy	2.3	Reviewed cash flow variance report as of 4/4/25.
4/8/2025	B. Kraemer	1.7	Created an actuals versus forecast variance analysis from the Petition Date through the forecasted wind down.
4/8/2025	B. Butler	1.7	Reviewed actual cash flows from 2–26-25 through 4-6-25 as compared to the DIP financing budget for the same period.
4/8/2025	J. Racy	1.4	Updated wind down budget analysis with latest assumptions.
4/8/2025	B. Kraemer	1.2	Prepared the variance report due to the DIP Lender for week ended 4/5, pursuant to the DIP Financing Interim Order.
4/8/2025	B. Butler	0.9	Developed assumptions for Chapter 11 bankruptcy case wind down budget from post closing date through case dismissal.
4/9/2025	J. Racy	2.4	Updated DIP lender variance report for the period ended 4/5/24.
4/9/2025	J. Racy	1.8	Updated revised wind down budget reflecting cash flow actuals through 4/5/25.
4/9/2025	B. Kraemer	1.3	Revised the actuals versus forecast variance analysis from the Petition Date through the forecasted wind down with a change in this week's forecasted operating disbursements assumptions.
4/9/2025	B. Butler	1.2	Reviewed actual cash flow results for the week ended 4–6-25 as compared to the DIP financing budget.
4/9/2025	B. Kraemer	1.1	Revised the actuals versus forecast variance analysis from the Petition Date through the forecasted wind down with a change in the forecasted wind down assumptions.
4/9/2025	B. Kraemer	0.9	Revised the commentary in the variance report due to the DIP Lender for week ended 4/5, pursuant to the DIP Financing Interim Order.

Date	Professional	Hours	Description
19. Cash Flow/Cash Management/ Liquidity			
4/9/2025	B. Kraemer	0.5	Updated the daily cash actuals tracker with the 4/8 data provided by the Debtors.
4/10/2025	J. Racy	2.6	Updated revised wind down budget comparison file with latest assumptions.
4/10/2025	B. Butler	1.7	Developed draft wind down budget assumptions, post sales closing through Chapter 11 bankruptcy case dismissal.
4/10/2025	J. Racy	1.4	Updated full case budget to actuals cash flow analysis.
4/10/2025	J. Racy	1.3	Continued to update revised wind down budget.
4/10/2025	B. Butler	0.8	Reviewed actual cash flows results from the inception of the bankruptcy case through 4–9-25 as compared to the DIP financing budget.
4/10/2025	J. Racy	0.6	Updated cash flow variance report as of 4/5/25.
4/10/2025	B. Kraemer	0.5	Updated the daily cash actuals tracker with the 4/9 data provided by the Debtors.
4/10/2025	B. Butler	0.4	Reviewed daily cash, receipts/disbursements through 4–8-25.
4/11/2025	J. Racy	2.3	Revised draft of wind down budget with latest assumptions.
4/11/2025	B. Kraemer	1.3	Updated the actuals versus forecast variance analysis from the Petition Date through the forecasted wind down with actuals through 4/10.
4/11/2025	B. Butler	1.1	Developed updated wind down budget assumptions, post sales closing through bankruptcy case dismissal.
4/11/2025	J. Racy	1.1	Updated full case budget to actuals cash flow analysis.
4/11/2025	B. Kraemer	0.7	Updated the wind down assumptions in the actuals versus forecast variance analysis from the Petition Date through the forecasted wind down.
4/11/2025	B. Butler	0.5	Reviewed Debtors' daily cash receipts/disbursements through 4–10-25.
4/11/2025	B. Kraemer	0.5	Updated the daily cash actuals tracker with the 4/10 data provided by the Debtors.
4/14/2025	J. Racy	1.5	Reviewed updated wind down budget with actuals through 4/13.
4/14/2025	B. Kraemer	1.4	Revised the actual versus forecast total case variance analysis with cash flow actuals through week ended 4/13.

Date	Professional	Hours	Description
19. Cash Flow/Cash Management/ Liquidity			
4/14/2025	J. Racy	1.2	Reviewed summary of actuals to forecast receipts and disbursements for DIP reporting file as of 4/12/25.
4/14/2025	B. Butler	1.1	Developed wind down budget through estimated time of Chapter 11 bankruptcy case dismissal.
4/14/2025	B. Butler	0.9	Reviewed preliminary DIP financing budget actual results through 4-11-25 as compared to operative DIP budget.
4/14/2025	B. Kraemer	0.8	Updated the wind down assumptions in the actuals versus forecast total case variance analysis.
4/15/2025	J. Racy	1.4	Updated total case variance report analysis.
4/15/2025	B. Butler	0.9	Reviewed preliminary draft wind down operations budget through case dismissal.
4/15/2025	B. Butler	0.8	Reviewed actual cash flow results through 4-11-25 as compared to the DIP financing budget.
4/15/2025	J. Racy	0.7	Updated operative wind down budget with the latest assumptions.
4/16/2025	B. Kraemer	1.2	Revised the actual versus forecast total case variance analysis to provide greater detail on the wind down budget line items.
4/16/2025	J. Racy	1.2	Updated total case variance report analysis.
4/16/2025	J. Racy	1.1	Updated wind down budget to reflect latest assumptions.
4/16/2025	B. Butler	0.7	Reviewed actual cash flow results through 4-11-25 as compared to the DIP budget.
4/16/2025	B. Butler	0.6	Reviewed draft wind down operations budget through Chapter 11 case dismissal.
4/21/2025	J. Racy	1.6	Reviewed cash flow activity through 4/18/25.
4/21/2025	B. Kraemer	1.2	Updated the wind down budget with the week ended 4/20 actuals.
4/21/2025	B. Butler	0.7	Reviewed updated wind down operations budget.
4/21/2025	B. Kraemer	0.7	Revised certain assumptions in the wind down budget.
4/21/2025	B. Butler	0.5	Reviewed actual cash flow results through 4-18-25 as compared to original DIP financing budget.
4/22/2025	B. Butler	0.7	Reviewed actual cash flow results through 4-18-25 as compared to the original DIP financing budget.

Date	Professional	Hours	Description
19. Cash Flow/Cash Management/ Liquidity			
4/22/2025	B. Butler	0.5	Reviewed wind down operations budget for remainder of the case.
4/24/2025	B. Butler	0.4	Reviewed updated wind down operations budget through the pendency of the case.
4/28/2025	B. Kraemer	2.9	Produced an analysis for all cash transactions in the BMO account post sale close, distinguishing between which are attributable to Avem and the Estate, respectively.
4/28/2025	B. Kraemer	2.5	Continued to produce an analysis for all cash transactions in the BMO account post sale close, distinguishing between which are attributable to Avem and the Estate, respectively.
4/28/2025	B. Kraemer	1.8	Built the framework of a daily bank cash roll forward for the operating bank account, showing transactions and bank balances for both Avem and the Estate.
4/28/2025	J. Racy	1.7	Created a new post sale close template for daily BMO bank cash reporting, reflecting transactions and bank balances for both Avem and the Estate.
4/28/2025	J. Racy	0.7	Created template for daily bank cash roll forward showing balances for Avem and the Estate based on former CFO S. Finley provided information.
4/29/2025	J. Racy	2.2	Reviewed revised daily BMO bank cash report as of 4/29/25.
4/29/2025	B. Kraemer	2.2	Updated the daily bank cash roll forward with cash flow actuals from bank account source data through 4/18.
4/29/2025	B. Kraemer	1.9	Updated the daily bank cash roll forward with cash flow actuals from bank account source data through 4/29.
4/30/2025	J. Racy	0.9	Reviewed daily cash activity as of 4/30/25.
4/30/2025	J. Racy	0.7	Updated revised wind down budget.
4/30/2025	B. Kraemer	0.7	Updated the daily bank cash roll forward with cash flow actuals through 4/30.
4/30/2025	B. Butler	0.6	Reviewed revised Chapter 11 case wind down budget.
Task Code Total Hours		91.5	
36. Operation Management			
4/1/2025	B. Kraemer	1.2	Summarized the invoices received for pre petition lender's professional fees, which will be disbursed from the adequate assurance escrow account.

Date	Professional	Hours	Description
36. Operation Management			
4/1/2025	B. Kraemer	1.2	Updated the cash flow actuals tracker with the wire disbursements through 4/1 provided by the Debtors.
4/1/2025	B. Butler	0.9	Developed assumptions for post sales close through Chapter 11 case dismissal wind down operations budget.
4/2/2025	B. Kraemer	0.9	Updated the cash flow actuals tracker with the wire disbursements through 4/2 provided by the Debtors.
4/2/2025	J. Racy	0.7	Created summary of BMO adequate assurance invoices to date.
4/2/2025	B. Butler	0.3	Corresponded with BMO (R. Freed), CEO E. Ellis, CFO S. Finley re: BMO adequate assurance payments/BMO advisers incurred and unpaid fees through 4-1-25.
4/2/2025	B. Butler	0.2	Corresponded with Verita (K. Pscion, D. Calderon) re: confirmation of three escrow accounts cash balances at 3-31-25 (APA deposit; BMO adequate assurance; professional fee escrow accounts).
4/3/2025	B. Butler	1.5	Reviewed latest Chapter 11 first day and final Court orders prepetition actual and projected payments tracker.
4/7/2025	B. Butler	0.6	Reviewed Debtors' cash disbursements plan for the week ended 4-11-25.
4/7/2025	B. Butler	0.2	Corresponded with CEO E. Ellis, CFO S. Finley, Ropes (G. Galardi), Chipman (M. Desgrosseilliers, D. Egan) re: process to remit payments to buyer Avem post sales closing on former FMI customer collections received by FMI.
4/8/2025	B. Kraemer	2.4	Updated the cash flow actuals tracker with the wire disbursements through 4/3 provided by the Debtors.
4/8/2025	B. Kraemer	1.3	Updated the daily cash actuals tracker with the 4/3-4/7 data provided by the Debtors.
4/9/2025	B. Kraemer	1.5	Updated the cash flow actuals tracker with the wire disbursements for 4/8-4/9 provided by the Debtors.
4/9/2025	B. Kraemer	0.7	Prepared a list of wind down action items for the Debtors to complete after the sale close.
4/9/2025	J. Racy	0.2	Reviewed summary of adequate assurance fees outstanding and paid to date.
4/9/2025	J. Racy	0.2	Reviewed summary of lenders fees outstanding and paid to date.
4/10/2025	B. Kraemer	0.8	Produced a schedule of fees owed to the DIP Lender's professionals, showing the amounts paid to date and outstanding invoices for each firm.

Date	Professional	Hours	Description
36. Operation Management			
4/10/2025	B. Kraemer	0.8	Updated the cash flow actuals tracker with the wire disbursements through 4/10 provided by the Debtors.
4/10/2025	B. Butler	0.4	Corresponded through the day with King & Spaulding (M. Fishel), Chipman (D. Egan), CFO S. Finley, BMO, Katten (M. Crocker) re: increasing daily wire transfer dollar limits for Debtors' BMO cash account to effectuate required sales closing wire transfers.
4/10/2025	B. Kraemer	0.4	Updated the schedule of the BMO adequate assurance escrow account to reflect the latest invoices received from King & Spalding and Young Conaway.
4/10/2025	J. Racy	0.2	Reviewed summary adequate assurance fees and invoices.
4/10/2025	J. Racy	0.2	Reviewed summary lenders professional fees and invoices.
4/10/2025	B. Kraemer	0.2	Updated the schedule of the BMO adequate assurance escrow account to reflect the latest deposit made by the Debtors.
4/11/2025	J. Racy	0.4	Updated adequate assurance professional fee schedule with actuals.
4/14/2025	B. Kraemer	1.1	Updated the cash flow actuals tracker with week ended 4/13 check run.
4/14/2025	B. Kraemer	1.0	Summarized the receipts and disbursements from the Debtors' operating bank account that are assumed by Avem to calculate the net funds to be distributed to Avem.
4/14/2025	J. Racy	0.9	Created summary of revised pre petition AP per 4/14/25 provided accounts payable reports.
4/14/2025	B. Kraemer	0.6	Updated the cash flow actuals tracker with the wire disbursements through 4/11 provided by the Debtors.
4/14/2025	B. Butler	0.5	Reviewed disbursements plan through 4-25-25.
4/15/2025	J. Racy	1.3	Reviewed comparison of pre petition accounts payable from 4/13 provided report to 4/14 provided report.
4/15/2025	B. Kraemer	0.8	Updated the net distribution to Avem file with the receipts and wire disbursements through 4/15 provided by the Debtors.
4/16/2025	B. Kraemer	1.1	Updated the net distribution to Avem file with the receipts and wire disbursements through 4/16 provided by the Debtors.
4/17/2025	B. Kraemer	1.3	Updated the net distribution to Avem file with the checks cut this week provided by the Debtors.
4/17/2025	J. Racy	0.9	Reviewed Avem net distribution calculation for 4/18/25 distribution.

Date	Professional	Hours	Description
36. Operation Management			
4/17/2025	B. Kraemer	0.8	Updated the cash flow actuals tracker with the wire disbursements through 4/17 provided by the Debtors.
4/18/2025	B. Kraemer	1.2	Reviewed the checks that have cleared from the Debtors' operating bank account to reconcile current outstanding checks amount.
4/18/2025	B. Kraemer	0.7	Drafted the next net distribution to Avem report with the receipts and wire disbursements through 4/18 provided by the Debtors.
4/18/2025	B. Kraemer	0.4	Updated the cash flow actuals tracker with the wire disbursements through 4/18 provided by the Debtors.
4/21/2025	B. Kraemer	2.1	Analyzed the list of outstanding checks to determine the current amount outstanding attributable to both the Debtors and Avem.
4/21/2025	B. Kraemer	0.9	Updated the cash flow actuals tracker with the wire disbursements through 4/21 provided by the Debtors.
4/21/2025	B. Kraemer	0.8	Updated the draft 4/25 net distribution to Avem report with the receipts and wire disbursements through 4/21 provided by the Debtors.
4/21/2025	B. Kraemer	0.6	Created a table summarizing the descriptions and current balances of the two Debtors' bank accounts and three escrow accounts.
4/21/2025	B. Butler	0.6	Reviewed Debtors' disbursements plan through 5-2-25.
4/22/2025	J. Racy	1.3	Calculated Q1 UST fee and created summary output.
4/22/2025	B. Kraemer	0.6	Calculated the amount of UST fees due for Q1 based on post petition disbursements through 3/31.
4/22/2025	B. Butler	0.5	Reviewed Debtors' outstanding checks detail as of 4-21-25.
4/22/2025	B. Butler	0.4	Reviewed calculations of UST fees for the quarter ended 3-31-25 for each of the Debtors.
4/22/2025	B. Kraemer	0.4	Updated the draft 4/25 net distribution to Avem report with the receipts and wire disbursements through 4/22 provided by the Debtors.
4/22/2025	J. Racy	0.3	Reviewed draft Avem weekly distribution calculation as of 4/22/24.
4/23/2025	J. Racy	0.8	Updated Q1 UST fee calculation per feedback from former CFO S. Finley.
4/23/2025	B. Kraemer	0.7	Updated the draft 4/25 net distribution to Avem report with the receipts and wire disbursements through 4/23 provided by the Debtors.

Date	Professional	Hours	Description
36. Operation Management			
4/23/2025	B. Kraemer	0.5	Updated the cash flow actuals tracker with the wire disbursements through 4/23 provided by the Debtors.
4/23/2025	J. Racy	0.4	Reviewed draft Avem weekly distribution calculation as of 4/23/24.
4/23/2025	J. Racy	0.3	Reviewed Q1 UST fee calculation to MOR reporting figure bridge.
4/23/2025	B. Kraemer	0.2	Created a bridge between the total disbursements reported in the MOR versus the amount reported to the UST for the Q1 fee calculation.
4/24/2025	B. Kraemer	0.7	Updated the draft 4/25 net distribution to Avem report with the receipts and wire disbursements through 4/24 provided by the Debtors.
4/24/2025	J. Racy	0.5	Reviewed draft Avem weekly distribution calculation as of 4/24/24.
4/25/2025	J. Racy	1.1	Updated Avem weekly distribution calculation as of 4/25/24 per latest receipts and disbursement information provided by former CFO S. Finley.
4/25/2025	B. Butler	0.5	Reviewed cash disbursements plan through 5–9-25.
4/25/2025	B. Butler	0.4	Reviewed buyer Avem customer collections received by FMI and payments made by the Debtors on behalf of the buyer for the period from 4–18-25 through 4–25-25.
4/26/2025	B. Kraemer	0.7	Updated the draft 4/29 net distribution to Avem report with the receipts and wire disbursements through 4/26 provided by the Debtors.
4/26/2025	B. Kraemer	0.4	Updated the cash flow actuals tracker with the wire disbursements through 4/26 provided by the Debtors.
4/28/2025	B. Butler	0.9	Reviewed daily cash activity roll forward from 4–12-25 through 4–25-25 for each of the Debtors and buyer Avem.
4/28/2025	B. Kraemer	0.8	Updated the draft net distribution to Avem report with the receipts and wire disbursements through 4/28 provided by the Debtors.
4/28/2025	J. Racy	0.7	Reviewed updated Avem distribution calculation per latest information provided by former CFO S. Finley.
4/28/2025	B. Butler	0.5	Reviewed cash disbursements plan through 5-9-25.
4/28/2025	B. Butler	0.4	Reviewed buyer Avem customer receipts collected by FMI offset by payments made by the Debtors on behalf of the buyer through 4–25-25.

Date	Professional	Hours	Description
36. Operation Management			
4/29/2025	B. Kraemer	1.6	Reconciled cleared checks that have been deducted from Avem's distribution to determine the outstanding Avem checks.
4/29/2025	B. Kraemer	1.4	Reconciled cleared checks that are paid by the Estate to determine the Estate's outstanding checks balance.
4/29/2025	B. Kraemer	0.8	Created a bridge from 4/18 Avem bank cash, showing the components that were included and not included in the 4/18 Avem distribution.
4/29/2025	B. Kraemer	0.5	Updated the draft net distribution to Avem report with the receipts and wire disbursements through 4/29 provided by the Debtors.
4/30/2025	B. Butler	1.4	Reviewed daily bank cash roll forward activity from 4-12-25 through 4-28-25 for the Debtors and buyer Avem.
4/30/2025	B. Kraemer	0.8	Created a bridge from the Avem ending bank cash to the current Avem distribution amount, showing outstanding checks and adjustments.
4/30/2025	B. Kraemer	0.6	Updated the draft net distribution to Avem report with the receipts and wire disbursements through 4/30 provided by the Debtors.
4/30/2025	B. Kraemer	0.2	Updated the summary of bank/escrow accounts with the latest balances as of 4/30.
Task Code Total Hours		56.3	
37. Vendor Management			
4/1/2025	B. Kraemer	2.7	Created a tracker for actual pre petition payments made to each critical vendor by week after the Petition Date.
4/1/2025	J. Racy	1.2	Created summary of critical vendor payments for week ended 4/6/25.
4/1/2025	J. Racy	1.2	Reconciled additional critical vendor accruals from petition date through 3/30.
4/1/2025	J. Racy	0.9	Created schedule of critical vendor payments from week ended 3/30 through case end.
4/1/2025	J. Racy	0.6	Created summary of critical vendor payments made to date as of 3/31/25.
4/2/2025	J. Racy	2.6	Updated summary of critical vendor payments, balances and potential discounts.
4/2/2025	B. Butler	1.7	Reviewed critical vendor payments tracker by week in actual and forecasted amounts.

Date	Professional	Hours	Description
37. Vendor Management			
4/2/2025	B. Kraemer	1.6	Revised the critical vendor actual pre petition payments tracker to include each critical vendor's additional accruals that have been recognized after the Petition Date.
4/2/2025	B. Butler	0.8	Reconciled actual and projected critical vendor payments by vendor and in total to authorized \$3.5 million critical vendor order.
4/2/2025	B. Kraemer	0.8	Revised the critical vendor actual pre petition payments tracker to include the surplus/deficit that the Debtors owe to critical vendors after week ended 4/13 relative to the authorized budget approved by the Court.
4/2/2025	B. Kraemer	0.6	Revised the critical vendor actual pre petition payments tracker to include a subtotal for critical vendors that have executed agreements and a subtotal for critical vendors that do not have agreements.
4/3/2025	J. Racy	2.7	Updated summary of critical vendor payments, balances and potential discounts.
4/3/2025	J. Racy	2.6	Created summary of 503b(9) payments.
4/3/2025	B. Butler	1.7	Reconciled actual and projected critical vendor payments as compared to authorized Court order allowed amount.
4/3/2025	B. Butler	1.4	Reviewed 503(b)(9) shipments prior to petition day and related payments to be disbursed by vendor in accordance with DIP financing budget.
4/3/2025	J. Racy	0.8	Participated in call with CFO S. Finley to review critical vendor payments through remainder of case.
4/3/2025	B. Butler	0.8	Participated in first call with CFO (S. Finley) re: critical vendor payments made to date and projected future: payments, 503(b)(9) payments to be made in future, next steps.
4/3/2025	B. Butler	0.5	Participated in second call with CFO (S. Finley) re: vendor management to sales closing, 503(b)(9) payments, next actions.
4/4/2025	B. Butler	1.3	Reconciled actual and projected critical vendor payments as compared to Court order authorized amount.
4/4/2025	B. Butler	1.0	Reviewed 503(b)(9) shipments 20 days before the petition date and related payments thereon.
4/8/2025	B. Kraemer	0.8	Created a schedule of the professional fee escrow account, including each professional firm's fees, to communicate the funds needed to be deposited into the escrow account.
4/9/2025	J. Racy	1.6	Reviewed analysis of additional critical vendor accruals and available budget as of 4/4/25.

Date	Professional	Hours	Description
37. Vendor Management			
4/9/2025	B. Kraemer	1.4	Updated the critical vendor actual pre petition payments tracker with the actual week ended 4/6 payments to critical vendors.
4/9/2025	B. Kraemer	1.1	Updated the critical vendor pre petition AP balances with new accruals, per the 4/4 AP Aging report provided by the Debtors.
4/9/2025	B. Butler	0.4	Reviewed King & Spaulding and YCST DIP lender CRG counsel actual professional fees through 3-31-25 invoices and estimated professional fees through to the 4-11-25 sales closing.
4/10/2025	B. Butler	0.9	Reviewed latest critical vendor payments since case inception analysis through 4-9-25 as compared to authorized court order.
4/10/2025	B. Kraemer	0.3	Updated the schedule of the professional fee escrow account to reflect the latest deposit made by the Debtors.
4/11/2025	J. Racy	0.4	Updated FMI professional fee schedule with actuals.
4/14/2025	B. Butler	0.8	Reviewed updated critical vendor payments made tracker by vendor, remaining payments to make, additional incurred trade obligations.
4/14/2025	B. Kraemer	0.8	Summarized the revised 4/13 AP report sent on 4/14 by vendor and whether the payable is pre petition or post petition.
4/14/2025	B. Kraemer	0.7	Continued to summarize the 4/13 AP report by vendor and whether the payable is pre petition or post petition.
4/14/2025	B. Kraemer	0.3	Reconciled the changes between the 4/14 AP report and the 4/13 AP report.
4/14/2025	J. Racy	0.2	Drafted response email to former CFO S. Finley and Verita team outlining next steps on distribution of funds from professional fee escrow account.
4/15/2025	B. Kraemer	0.9	Updated the critical vendor pre petition AP balances with the latest AP Aging report as of 4/13 provided by the Debtors.
4/15/2025	J. Racy	0.8	Updated pre petition vendor balances schedule with latest payment plans.
4/15/2025	B. Kraemer	0.7	Created a fee applications tracker, including Chipman's and Configure's applications that were filed today, to track the fees submitted relative to the budget.
4/15/2025	B. Butler	0.7	Reviewed updated eligible critical vendor payments made to date, remaining payments to be made, additional incurred obligations.
4/15/2025	B. Kraemer	0.7	Updated the critical vendor actual pre petition payments tracker with the actual week ended 4/13 payments to critical vendors.
4/15/2025	J. Racy	0.2	Created schedule of weekly critical vendor payments.

Date	Professional	Hours	Description
37. Vendor Management			
4/16/2025	B. Kraemer	0.3	Updated the fee applications tracker to include the total amounts invoiced, rather than just the 80% of fees amounts submitted in the fee applications.
4/17/2025	B. Kraemer	0.4	Updated the fee applications tracker with the BRG fee application filed today.
4/17/2025	B. Butler	0.3	Corresponded with former CEO E. Ellis, former CFO S. Finley, Board Chair M. Zawalski, Endeavour (D. Eve, R. Lamba), Chipman (M. Desgrosseilliers, D. Egan) re: review of BRG first fee app, comparison of related funded professional fee escrow amount.
4/18/2025	B. Butler	0.3	Reviewed Verita invoice for the period through 3-31-25.
4/21/2025	B. Kraemer	0.9	Summarized the 4/19 AP report by vendor and whether the payable is pre petition or post petition.
4/21/2025	B. Kraemer	0.7	Updated the eligible critical vendors' balances and payments tracker with week ended 4/20 actuals and planned week ended 4/27 payments.
4/29/2025	B. Butler	0.3	Reviewed draft motion to retain Carroll Services, LLC to provide J. Carroll as Debtors CRO and additional personnel.
4/29/2025	B. Butler	0.2	Reviewed draft CRO retention agreement.
4/30/2025	B. Kraemer	0.4	Updated the fee applications tracker with the Configure final fee application filed today.
Task Code Total Hours		45.0	
Total Hours		335.7	

**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 (LLS)

)

) (Jointly Administered)

)

) **Objection Deadline: June 19, 2025 at 4:00 p.m. (ET)**

**NOTICE OF SECOND MONTHLY APPLICATION OF BERKELEY RESEARCH
GROUP, LLC FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE
DEBTORS DURING THE PERIOD FROM APRIL 1, 2025 THROUGH APRIL 30, 2025**

PLEASE TAKE NOTICE that the *Second Monthly Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Debtors During the Period from April 1, 2025 Through April 30, 2025* (the “**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 Application, if any, must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 132] and are required to be filed on or before **June 19, 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 19801 (Attn: Kenneth J. Enos; email: kenos@ycst.com); and (iii) the Office of the United States

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.

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).

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THE DEBTORS WILL BE AUTHORIZED TO PAY 80% OF THE REQUESTED FEES AND 100% OF THE REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT.

PLEASE TAKE FURTHER NOTICE THAT ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURES WILL A HEARING BE HELD ON THE APPLICATION.

[Signature Page Follows]

Dated: May 29, 2025
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

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

Mark L. Desgrosseilliers (No. 4083)

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Possession*