

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. 242

CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY OF ORDERS (I) ESTABLISHING PROCEDURES FOR PAYMENT OF FINAL FEE APPLICATIONS, (II) DISMISSING THE CHAPTER 11 CASES, (III) AUTHORIZING THE DEBTORS TO ABANDON OR DESTROY CERTAIN BOOKS AND RECORDS, (IV) AUTHORIZING THE DEBTORS TO DISSOLVE, (V) EXCULPATING CERTAIN PARTIES FROM LIABILITY IN CONNECTION WITH THE CHAPTER 11 CASES, (VI) TERMINATING ENGAGEMENT OF CLAIMS AGENT, AND (VII) GRANTING RELATED RELIEF

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

1. On May 14, 2025, the Debtors filed the *Debtors' Motion for Entry of Orders (I) Establishing Procedures for Payment of Final Fee Applications, (II) Dismissing the Chapter 11 Cases, (III) Authorizing the Debtors to Abandon or Destroy Certain Books and Records, (IV) Authorizing the Debtors to Dissolve, (V) Exculpating Certain Parties from Liability in Connection with the Chapter 11 Cases, (VI) Terminating Engagement of Claims Agent, and (VII) Granting Related Relief* [Docket No. 242] (the "**Motion**"). The proposed *Initial Order (I) Approving the Dismissal of the Chapter 11 Cases, (II) Establishing Procedures for Payment of Final Fee Applications, and (III) Granting Related Relief* (the "**Professional Fee Order**") was

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.



attached as Exhibit A to the Motion. The proposed *Order Granting the Debtors' Motion for Entry of an Order (I) Dismissing the Chapter 11 Cases, (II) Authorizing the Debtors to Abandon or Destroy Certain Books and Records, (III) Authorizing the Debtors to Dissolve, (IV) Exculpating Certain Parties from Liability in Connection with the Chapter 11 Cases, (V) Terminating Engagement of Claims Agent, and (VI) Granting Related Relief* (the “**Dismissal Order**”) was attached as Exhibit B to the Motion.

2. Pursuant to the notice of Motion, the deadline to file objections regarding the relief requested in the Motion was set for June 3, 2025, at 4:00 p.m. (Eastern Time) (the “**Objection Deadline**”). The Objection Deadline was extended to June 5, 2025 (the “**Extended Objection Deadline**”) for the Office of the United States Trustee (the “**U.S. Trustee**”) and Rexford Industrial 27712 Avenue Mentry, LLC.

3. Prior to the Extended Objection Deadline, the Debtors received informal comments from the U.S. Trustee to the Professional Fee Order and the Dismissal Order.

4. The Debtors hereby submit a revised form of Professional Fee Order (the “**Revised Professional Fee Order**”), attached hereto as **Exhibit A**, which reflects changes to the original order filed with the Motion, in response to the comments received from the U.S. Trustee. Attached as **Exhibit B** is a blackline of the Revised Professional Fee Order against the Professional Fee Order attached to the Motion.

5. The Debtors hereby also submit a revised form of Dismissal Order (the “**Revised Dismissal Order**”), attached hereto as **Exhibit C**, which reflects changes to the original order filed with the Motion, in response to the comments received from the U.S. Trustee. Attached as **Exhibit D** is a blackline of the Revised Dismissal Order against the Dismissal Order attached to the Motion.

6. The Revised Professional Fee Order and Revised Dismissal Order have been reviewed by and are acceptable to the U.S. Trustee. The Debtors have received no other comments, objections, or responses to the relief requested in the Motion.

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

Dated: June 6, 2025

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EXHIBIT A

Revised Professional Fee Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

Dynamic Aerostructures LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. 242

**INITIAL ORDER (I) APPROVING THE DISMISSAL OF THE CHAPTER 11 CASES,
(II) ESTABLISHING PROCEDURES FOR PAYMENT OF FINAL FEE
APPLICATIONS, AND (III) GRANTING RELATED RELIEF**

Upon the Debtors' motion (the "Motion")² pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code for the entry of an order, among other things, (a) approving the dismissal of these Chapter 11 Cases, (b) establishing procedures for payment of final fee applications, and (c) granting related relief; and this Court having reviewed the Motion and having conducted a hearing on the Motion, at which time the Debtors and all parties in interest were given an opportunity to be heard; and it appearing that sufficient notice of the Motion has been given to parties in interest; and the Court having found that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (b) notice of the Motion and the opportunity for a hearing thereon was adequate and sufficient under the circumstances and no other or further notice need be given, (c) the legal and factual bases set forth in the Motion constitute just cause for the relief granted herein, and (d) the relief requested

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

in the Motion is in the best interests of the Debtors' estates and creditors; and after due deliberation thereon and sufficient cause appearing therefor, it is

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is hereby GRANTED as set forth herein.
2. The Debtors are authorized to establish a Wind-Down Reserve in the amount of \$650,000 to fund any reasonable costs, expenses, and fees (including attorneys' fees) necessary to wind down the Debtors and the estates after the dismissal of these Chapter 11 Cases and dissolve the Debtor entities. To the extent any funds remain in the Wind-Down Reserve after paying the wind-down obligations, the Debtors will promptly remit such funds to the Prepetition Lender to be applied against the Debtors' obligations under the Prepetition Credit Facility.
3. Notwithstanding any provisions of the Interim Compensation Order to the contrary, all Professionals that have not obtained entry of a final order approving their fees shall file final fee applications for Professional Fees and Expenses by June 27, 2025. Any objections to the Final Fee Applications shall be filed and served on counsel for the Debtors and the Professional submitting the application to which an objection is being filed by no later than July 18, 2025 at 4:00 p.m. (prevailing Eastern Time). The Court will hold a hearing, if necessary, on August 5, 2025 at 2:00 p.m. (prevailing Eastern Time) to resolve any objections or disputes related to Final Fee Applications.
4. After Final Fee Applications have been heard, allowed Professional Fees and Expenses have been paid, U.S. Trustee fees have been paid, and the Wind-Down Reserve has been established, the Debtors shall file a certification of counsel (the "Certification") requesting entry of the Dismissal Order. Among other things, the Certification should verify that (a) all U.S. Trustee fees have been paid in full, (b) all Professional Fees and Expenses incurred in these

Chapter 11 Cases have been approved on a final basis and paid in full, and (c) the Wind-Down Reserve has been established.

5. The Debtors are only required to serve the Certification and this Order on the U.S. Trustee, counsel to the Prepetition Lender, those parties requesting notice pursuant to Bankruptcy Rule 2002, and any party whose rights may be affected by the dismissal of the Chapter 11 Cases, and no further notice regarding the dismissal of the Chapter 11 Cases shall be required. The Debtors' creditors and parties in interest have received reasonable notice of the proposed dismissal through notice of the hearing on the Motion.

6. To the extent any funds remain with the Debtors (other than funds in the Professional Fee Reserve) after (a) payment in full of all U.S. Trustee fees, all fees and expenses of the Claims Agent, and any other administrative expense claims in these Chapter 11 Cases (other than Professional Fees and Expenses), (b) funding the Wind-Down Reserve, and (c) making any other payments set forth in this Order, the Debtors are hereby authorized to remit such funds to the Prepetition Lender to be applied against the Debtors' obligations under the Prepetition Credit Facility.

7. To the extent any funds remain in the Professional Fee Reserve after payment in full of all allowed Professional Fees and Expenses, the Debtors are hereby authorized to use such funds to (a) first, fund any deficiency in the Wind-Down Reserve, and (b) second, remit any remaining funds to the Prepetition Lender to be applied against the Debtors' obligations under the Prepetition Credit Facility.

8. To the extent applicable, Bankruptcy Rules 6004(h) and 6006(d) are waived and this Order shall be effective and enforceable immediately upon entry.

9. The Debtors are authorized to take any and all actions necessary to effectuate the relief granted pursuant to this Order.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Redline Revised Professional Fee Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

Dynamic Aerostructures LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. ~~---~~[242](#)

**INITIAL ORDER (I) APPROVING THE DISMISSAL OF THE CHAPTER 11 CASES,
(II) ESTABLISHING PROCEDURES FOR PAYMENT OF FINAL FEE
APPLICATIONS, AND (III) GRANTING RELATED RELIEF**

Upon the Debtors' motion (the "Motion")² pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code for the entry of an order, among other things, (a) approving the dismissal of these Chapter 11 Cases, (b) establishing procedures for payment of final fee applications, and (c) granting related relief; and this Court having reviewed the Motion and having conducted a hearing on the Motion, at which time the Debtors and all parties in interest were given an opportunity to be heard; and it appearing that sufficient notice of the Motion has been given to parties in interest; and the Court having found that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (b) notice of the Motion and the opportunity for a hearing thereon was adequate and sufficient under the circumstances and no other or further notice need be given, (c) the legal and factual bases set forth in the Motion constitute just cause for the relief granted

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herein, and (d) the relief requested in the Motion is in the best interests of the Debtors' estates and creditors; and after due deliberation thereon and sufficient cause appearing therefor, it is

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is hereby GRANTED as set forth herein.
2. The Debtors are authorized to establish a Wind-Down Reserve in the amount of \$650,000 to fund any reasonable costs, expenses, and fees (including attorneys' fees) necessary to wind down the Debtors and the estates after the dismissal of these Chapter 11 Cases and dissolve the Debtor entities. To the extent any funds remain in the Wind-Down Reserve after paying the wind-down obligations, the Debtors will promptly remit such funds to the Prepetition Lender to be applied against the Debtors' obligations under the Prepetition Credit Facility.
3. Notwithstanding any provisions of the Interim Compensation Order to the contrary, all Professionals that have not obtained entry of a final order approving their fees shall file final fee applications for Professional Fees and Expenses by June 27, 2025. Any objections to the Final Fee Applications shall be filed and served on counsel for the Debtors and the Professional submitting the application to which an objection is being filed by no later than July 18, 2025 at 4:00 p.m. (prevailing Eastern Time). The Court will hold a hearing, if necessary, on August 5, 2025 at 2:00 p.m. (prevailing Eastern Time) to resolve any objections or disputes related to Final Fee Applications.
4. After Final Fee Applications have been heard, allowed Professional Fees and Expenses have been paid, U.S. Trustee fees have been paid, and the Wind-Down Reserve has been established, the Debtors shall file a certification of counsel (the "Certification") requesting entry of the Dismissal Order. Among other things, the Certification should verify that (a) all U.S. Trustee fees have been paid in full, (b) all Professional Fees and Expenses incurred in these

Chapter 11 Cases have been approved on a final basis and paid in full, and (c) the Wind-Down Reserve has been established.

5. The Debtors are only required to serve the Certification and this Order on the U.S. Trustee, counsel to the Prepetition Lender, ~~and~~ those parties requesting notice pursuant to Bankruptcy Rule 2002, and any party whose rights may be affected by the dismissal of the Chapter 11 Cases, and no further notice regarding the dismissal of the Chapter 11 Cases shall be required. The Debtors' creditors and parties in interest have received reasonable notice of the proposed dismissal through notice of the hearing on the Motion.

6. To the extent any funds remain with the Debtors (other than funds in the Professional Fee Reserve) after (a) payment in full of all U.S. Trustee fees, all fees and expenses of the Claims Agent, and any other administrative expense claims in these Chapter 11 Cases (other than Professional Fees and Expenses), (b) funding the Wind-Down Reserve, and (c) making any other payments set forth in this Order, the Debtors are hereby authorized to remit such funds to the Prepetition Lender to be applied against the Debtors' obligations under the Prepetition Credit Facility.

7. To the extent any funds remain in the Professional Fee Reserve after payment in full of all allowed Professional Fees and Expenses, the Debtors are hereby authorized to use such funds to (a) first, fund any deficiency in the Wind-Down Reserve, and (b) second, remit any remaining funds to the Prepetition Lender to be applied against the Debtors' obligations under the Prepetition Credit Facility.

8. To the extent applicable, Bankruptcy Rules 6004(h) and 6006(d) are waived and this Order shall be effective and enforceable immediately upon entry.

9. The Debtors are authorized to take any and all actions necessary to effectuate the relief granted pursuant to this Order.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Summary report:	
Litera Compare for Word 11.9.1.1 Document comparison done on 6/6/2025 8:45:06 AM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original DMS: nd://4911-1319-4569/1/FMI - Initial Dismissal Order.docx	
Modified DMS: nd://4911-1319-4569/2/FMI - Initial Dismissal Order.docx	
Changes:	
<u>Add</u>	2
Delete	2
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	4

EXHIBIT C

Revised Dismissal Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

Dynamic Aerostructures LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. 242

**ORDER GRANTING THE DEBTORS' MOTION FOR ENTRY OF AN ORDER
(I) DISMISSING THE CHAPTER 11 CASES, (II) AUTHORIZING THE DEBTORS TO
ABANDON OR DESTROY CERTAIN BOOKS AND RECORDS, (III) AUTHORIZING
THE DEBTORS TO DISSOLVE, (IV) EXCULPATING CERTAIN PARTIES FROM
LIABILITY IN CONNECTION WITH THE CHAPTER 11 CASES, (V) TERMINATING
ENGAGEMENT OF CLAIMS AGENT, AND (VI) GRANTING RELATED RELIEF**

Upon the Debtors' motion (the "Motion")² pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code for the entry of an order (this "Order"): (a) dismissing the Chapter 11 Cases; (b) authorizing, but not directing, the Debtors or their designee to abandon or destroy the Debtors' remaining books and records not taken by the Purchaser, subject to the terms herein; (c) authorizing the Debtors to dissolve; (d) exculpating certain parties from liability in connection with the Chapter 11 Cases; (e) terminating the services of Kurtzman Carson Consultants, LLC DBA Verita Global (the "Claims Agent") in the Chapter 11 Cases; and (f) granting related relief; and this Court having reviewed the Motion and having conducted a hearing on the Motion, at which time the Debtors and all parties in interest were given an opportunity to be heard; and it appearing that sufficient notice of the Motion has been given to parties in interest; and the Court having found that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334

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and this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (b) notice of the Motion and the opportunity for a hearing thereon was adequate and sufficient under the circumstances and no other or further notice need be given, (c) the legal and factual bases set forth in the Motion constitute just cause for the relief granted herein, and (d) the relief requested in the Motion is in the best interests of the Debtors' estates and creditors; and after due deliberation thereon and sufficient cause appearing therefor, it is

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is hereby GRANTED as set forth herein.
2. All objections to the Motion or the relief requested therein that have not been withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits and denied with prejudice.
3. Pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code, each of the Chapter 11 Cases are hereby dismissed effective as of the date of entry of this Order.
4. The Debtors shall file and serve on the U.S. Trustee any remaining monthly operating reports and pay any quarterly fees due and owing pursuant to 28 U.S.C. § 1930(a)(6) in the Chapter 11 Cases within 30 days of the entry of this Order. Entry of this Order is without prejudice to the rights of the U.S. Trustee to reopen the Chapter 11 Cases to seek appropriate relief in the event of an unresolved dispute over the payment of fees pursuant to 28 U.S.C. § 1930(a)(6).
5. Notwithstanding anything to the contrary, including, without limitation, section 349 of the Bankruptcy Code, all prior orders, releases, stipulations, settlements, rulings, orders and judgments of this Court made during the course of the Chapter 11 Cases, including, without limitation, the Sale Order and the DIP Orders, shall remain final and in full force and effect, shall be unaffected by the dismissal of the Chapter 11 Cases, and are specifically preserved for all preclusive purposes, including, without limitation, collateral estoppel and *res judicata*.

6. The Clerk of the Court shall enter this Order individually on each of the dockets of the Chapter 11 Cases and thereafter each docket shall be marked as “Closed.”

7. Entry of this Order is without prejudice to (a) the rights of the Debtors or any other party in interest to seek to reopen the Chapter 11 Cases for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the right of the Debtors or any other parties in interest to dispute, object to or resolve all claims that were filed against the Debtors in the Chapter 11 Cases.

8. Pursuant to sections 105(a) and 554 of the Bankruptcy Code and Bankruptcy Rule 6007, the Debtors are authorized, but not directed, to abandon or destroy, or cause to be abandoned or destroyed, any and all Books and Records not taken by the Purchaser that remain with the Debtors’ estates as of the date of entry of this Order; provided, however, that any hard copy documents containing personally identifiable information must be shredded and any electronic documents containing personally identifiable information must be destroyed.

9. Upon entry of this Order, the Claims Agent, as the Debtors’ claims and noticing agent, is relieved of its responsibilities as the Debtors’ claims and noticing agent in these Chapter 11 Cases; provided, however, that the Claims Agent shall provide the services described in this paragraph. Pursuant to Local Rule 2002-1(e)(ix), within fourteen (14) days of entry of this Order, the Claims Agent shall (a) forward to the Clerk of the Court an electric version of all imaged claims, (b) upload the creditor mailing list into CM/ECF, and (c) docket a combined final claims register in the lead case. Should the Claims Agent receive any mail regarding the Chapter 11 Cases after entry of this Order, the Claims Agent shall collect and forward such mail monthly, to the Debtors; provided, however, that the Claims Agent is authorized to destroy any undeliverable mail, correspondence, or other documents that it has in its possession related to the Debtors, other than the mail referenced in this paragraph. The above services to be rendered by Verita shall be a

charge to the estates and Verita shall be compensated in accordance with the terms of its Engagement Agreement.

10. As soon as reasonably practicable after entry of this Order, without the need for further action on the part of this Court and without the need for further corporate action or action of the board of directors of the Debtors, the Debtors shall be authorized to dissolve pursuant to applicable state law. Any officer or other authorized representative of the Debtors is authorized to execute and file on behalf of the Debtors all applicable tax returns or other documents necessary and proper to effectuate and consummate the dissolution of the Debtors in accordance with applicable law.

11. Notwithstanding the applicability of any Bankruptcy Rules to the contrary, the terms and conditions of this Order shall be effective and enforceable immediately upon entry of this Order.

12. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform any and all actions necessary to implement and effectuate the relief granted pursuant to this Order.

13. The Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or relating to the implementation of any order of this Court entered in the Chapter 11 Cases.

EXHIBIT D

Redline Revised Dismissal Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

Dynamic Aerostructures LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. ~~---~~[242](#)

**ORDER GRANTING THE DEBTORS' MOTION FOR ENTRY OF AN ORDER
(I) DISMISSING THE CHAPTER 11 CASES, (II) AUTHORIZING THE DEBTORS TO
ABANDON OR DESTROY CERTAIN BOOKS AND RECORDS, (III) AUTHORIZING
THE DEBTORS TO DISSOLVE, (IV) EXCULPATING CERTAIN PARTIES FROM
LIABILITY IN CONNECTION WITH THE CHAPTER 11 CASES, (V) TERMINATING
ENGAGEMENT OF CLAIMS AGENT, AND (VI) GRANTING RELATED RELIEF**

Upon the Debtors' motion (the "Motion")² pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code for the entry of an order (this "Order"): (a) dismissing the Chapter 11 Cases; (b) authorizing, but not directing, the Debtors or their designee to abandon or destroy the Debtors' remaining books and records not taken by the Purchaser, subject to the terms herein; (c) authorizing the Debtors to dissolve; (d) exculpating certain parties from liability in connection with the Chapter 11 Cases; (e) terminating the services of Kurtzman Carson Consultants, LLC DBA Verita Global (the "Claims Agent") in the Chapter 11 Cases; and (f) granting related relief; and this Court having reviewed the Motion and having conducted a hearing on the Motion, at which time the Debtors and all parties in interest were given an opportunity to be heard; and it appearing that sufficient notice of the Motion has been given to

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parties in interest; and the Court having found that (a) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), (b) notice of the Motion and the opportunity for a hearing thereon was adequate and sufficient under the circumstances and no other or further notice need be given, (c) the legal and factual bases set forth in the Motion constitute just cause for the relief granted herein, and (d) the relief requested in the Motion is in the best interests of the Debtors' estates and creditors; and after due deliberation thereon and sufficient cause appearing therefor, it is

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is hereby GRANTED as set forth herein.
2. All objections to the Motion or the relief requested therein that have not been withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits and denied with prejudice.
3. Pursuant to sections 105(a), 305(a), and 1112(b) of the Bankruptcy Code, each of the Chapter 11 Cases are hereby dismissed effective as of the date of entry of this Order.
4. The Debtors shall file and serve on the U.S. Trustee any remaining monthly operating reports and pay any quarterly fees due and owing pursuant to 28 U.S.C. § 1930(a)(6) in the Chapter 11 Cases within 30 days of the entry of this Order. Entry of this Order is without prejudice to the rights of the U.S. Trustee to reopen the Chapter 11 Cases to seek appropriate relief in the event of an unresolved dispute over the payment of fees pursuant to 28 U.S.C. § 1930(a)(6).
5. Notwithstanding anything to the contrary, including, without limitation, section 349 of the Bankruptcy Code, all prior orders, releases, stipulations, settlements, rulings, orders and judgments of this Court made during the course of the Chapter 11 Cases, including, without

limitation, the Sale Order and the DIP Orders, shall remain final and in full force and effect, shall be unaffected by the dismissal of the Chapter 11 Cases, and are specifically preserved for all preclusive purposes, including, without limitation, collateral estoppel and *res judicata*.

6. The Clerk of the Court shall enter this Order individually on each of the dockets of the Chapter 11 Cases and thereafter each docket shall be marked as “Closed.”

7. Entry of this Order is without prejudice to (a) the rights of the Debtors or any other party in interest to seek to reopen the Chapter 11 Cases for cause pursuant to section 350(b) of the Bankruptcy Code, and (b) the right of the Debtors or any other parties in interest to dispute, object to or resolve all claims that were filed against the Debtors in the Chapter 11 Cases.

8. Pursuant to sections 105(a) and 554 of the Bankruptcy Code and Bankruptcy Rule 6007, the Debtors are authorized, but not directed, to abandon or destroy, or cause to be abandoned or destroyed, any and all Books and Records not taken by the Purchaser that remain with the Debtors’ estates as of the date of entry of this Order; provided, however, that any hard copy documents containing personally identifiable information must be shredded and any electronic documents containing personally identifiable information must be destroyed.

9. Upon entry of this Order, the Claims Agent, as the Debtors’ claims and noticing agent, is relieved of its responsibilities as the Debtors’ claims and noticing agent in these Chapter 11 Cases; provided, however, that the Claims Agent shall provide the services described in this paragraph. Pursuant to Local Rule 2002-1(e)(ix), within fourteen (14) days of entry of this Order, the Claims Agent shall (a) forward to the Clerk of the Court an electric version of all imaged claims, (b) upload the creditor mailing list into CM/ECF, and (c) docket a combined final claims register in the lead case. Should the Claims Agent receive any mail regarding the

Chapter 11 Cases after entry of this Order, the Claims Agent shall collect and forward such mail monthly, to the Debtors; provided, however, that the Claims Agent is authorized to destroy any undeliverable mail, correspondence, or other documents that it has in its possession related to the Debtors, other than the mail referenced in this paragraph. The above services to be rendered by Verita shall be a charge to the estates and Verita shall be compensated in accordance with the terms of its Engagement Agreement.

10. As soon as reasonably practicable after entry of this Order, without the need for further action on the part of this Court and without the need for further corporate action or action of the board of directors of the Debtors, the Debtors shall be authorized to dissolve pursuant to applicable state law, ~~and the Debtors shall not be required to pay any taxes or fees to cause such dissolution.~~ Any officer or other authorized representative of the Debtors is authorized to execute and file on behalf of the Debtors all applicable tax returns or other documents necessary and proper to effectuate and consummate the dissolution of the Debtors in accordance with applicable law.

~~11. From and after the date of entry of this Order, the Debtors, the directors, managers, officers and employees of the Debtors who served during any portion of the Chapter 11 Cases, and the Debtors' professionals retained in these Chapter 11 Cases (each an "Exculpated Party"), shall be exculpated from any liability for any act taken or omitted to be taken in good faith from the Petition Date through the date of entry of this Order in connection with or related to the Chapter 11 Cases, including but not limited to, the implementation of this Order (other than an act in contravention of this Order), except for any claim or cause of action arising from the fraud, gross negligence, or willful misconduct of such Exculpated Party.~~

11. ~~12.~~ Notwithstanding the applicability of any Bankruptcy Rules to the contrary, the terms and conditions of this Order shall be effective and enforceable immediately upon entry of this Order.

12. ~~13.~~ The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform any and all actions necessary to implement and effectuate the relief granted pursuant to this Order.

13. ~~14.~~ The Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or relating to the implementation of any order of this Court entered in the Chapter 11 Cases.

Summary report:	
Litera Compare for Word 11.9.1.1 Document comparison done on 6/6/2025 8:44:09 AM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original DMS: nd://4900-9483-0665/1/FMI - Final Dismissal Order.docx	
Modified DMS: nd://4900-9483-0665/2/FMI - Final Dismissal Order.docx	
Changes:	
<u>Add</u>	4
Delete	7
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	11