IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

)
In re:) Chapter 11
Dynamic Aerostructures LLC, et al.,) Case No. 25-10292 (LSS)
Debtors. ¹) (Jointly Administered)
)) Related Docket No. 276

NOTICE OF FILING OF SUPPLEMENT TO THIRD MONTHLY AND FINAL APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE DEBTORS FOR THE MONTHLY PERIOD FROM MAY 1, 2025, THROUGH AND **INCLUDING JUNE 15, 2025, AND THE FINAL PERIOD FROM FEBRUARY 26, 2025,** THROUGH AND INCLUDING FINAL FEE APPLICATION HEARING

PLEASE TAKE NOTICE that on June 26, 2025, Chipman Brown Cicero & Cole, LLP ("CBCC"), co-counsel to the above-captioned debtors and debtors in possession (the "Debtors"), filed the Third Monthly and Final Application of Chipman Brown Cicero & Cole, LLP, for Compensation and Reimbursement of Expenses as Co-Counsel to the Debtors for the Monthly Period from May 1, 2025, Through and Including June 15, 2025, and the Final Period from February 26, 2025, Through and Including Final Fee Application Hearing [Docket No. 276] (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, in the Application, CBCC included estimated fees in the amount of \$40,000.00 on account of anticipated fees and expenses to be incurred for the period from June 15, 2025 through and including the scheduled hearing on the Application, for a total amount of \$382,705.00 of requested fees and \$8,009.02 in requested expenses.

PLEASE TAKE FURTHER NOTICE that CBCC hereby supplements (the "Supplement") its Application to include the amount of actual fees incurred in the amount of \$23,785.00, during the period from June 14, 2025 through July, 31 2025. Attached hereto as **Exhibit A** is additional detail regarding the actual amount of additional fees incurred from June 14, 2025 through July, 31 2025.

PLEASE TAKE FURTHER NOTICE that CBCC hereby requests final allowance of compensation in the amount of \$366,490.00 for professional services rendered, and \$8,009.02 for final reimbursement for actual and necessary costs and expenses incurred.

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.



Dated: August 1, 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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-and-

CHIPMAN BROWN CICERO & COLE, LLP

Daniel G. Egan (admitted *pro hac vice*) 501 5th Ave. 15th Floor New York, New York 10017 Telephone: (646) 741-5529 egan@chipmanbrown.com

Co-Counsel to the Debtors and Debtors in Possession

EXHIBIT A

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Chipman Brown Cicero Cole LLP

June 14, 2025 - July 31, 2025

Dynamic Aerostructures LLC, et al.

Case No. 25-10292 (LSS)

August 1, 2025
Invoice No. 19601

Date	User	Activity	Description	Hours	Rate	Total	
6/20/202	5 Renae Fusco	B110 Case Administration	draft CNO re BRG fee app	0.20	\$350.00		\$70.00
6/20/202	5 Renae Fusco	B110 Case Administration	efile BRG CNO	0.20	\$350.00		\$70.00
6/25/202	5 Daniel Egan	B110 Case Administration	review and comment on hearing notice (.1); review and revise OCP report (.3); correspondence with R. Fusco and client regarding same (.1)	0.50	\$750.00		\$375.00
6/25/202	5 Renae Fusco	B110 Case Administration	draft OCP quarterly report	0.40	\$350.00		\$140.00
6/26/202	5 Daniel Egan	B110 Case Administration	review notice of hearing (.1); correspondence with R. Fusco regarding same and OCP report issues (.2)	0.30	\$750.00		\$225.00
6/26/202	5 Renae Fusco	B110 Case Administration	efile OCP quarterly report (.1); coordinate service of same (.1)	0.20	\$350.00		\$70.00
6/27/202	5 Daniel Egan	B110 Case Administration	correspondence with R. Fusco regarding application	0.10	\$750.00		\$75.00
7/17/202	5 Renae Fusco	B110 Case Administration	draft final fee index order & coc	1.80	\$350.00		\$630.00
7/18/202	5 Renae Fusco	B110 Case Administration	draft notices re Carroll May & June monthly reports (.4); efile and coordinate service of same (.1)	0.50	\$350.00		\$175.00
7/18/202	5 Renae Fusco	B110 Case Administration	drafting final fee app binder index	0.60	\$350.00		\$210.00
7/21/202	5 Renae Fusco	B110 Case Administration	emails re fee CNOs	0.10	\$350.00		\$35.00
7/21/202	5 Renae Fusco	B110 Case Administration	coordinate prep of hearing binder	0.20	\$350.00		\$70.00
7/29/202	5 Mark Desgrosseilliers	B110 Case Administration	Prepare for final fee hearing (.3); review dismissal order issues (.1)	0.40	\$850.00		\$340.00
7/30/202	5 Daniel Egan	B110 Case Administration	review and revise certification of counsel (.2); correspondence with professionals regarding hearing and order (.2)	0.40	\$750.00		\$300.00
7/31/202	5 Renae Fusco	B110 Case Administration	draft 8/5 agenda	0.30	\$350.00		\$105.00
7/16/202	5 Daniel Egan	B150 Meetings of and Communications with Creditors	correspondence with creditor and purchaser regarding postpetition lease (.2); review APA regarding same (.2)	0.40	\$750.00		\$300.00
7/28/202	5 Daniel Egan	B150 Meetings of and Communications with Creditors	call with creditor regarding case and claim issues	0.30	\$750.00		\$225.00
6/16/202	5 Daniel Egan	B160 Fee/Employment Applications	review and comment on Verita final fee application (.5) correspondence with R. Fusco and Verita regarding same (.2)	0.70	\$750.00		\$525.00
6/16/202	5 Renae Fusco	B160 Fee/Employment Applications	edit Verita final fee app (.4); draft notice re same (.2)	0.60	\$350.00		\$210.00
6/16/202	5 Renae Fusco	B160 Fee/Employment Applications	efile Verita final fee app and coordinate service of same	0.20	\$350.00		\$70.00
6/17/202	5 Daniel Egan	B160 Fee/Employment Applications	correspondence with BRG regarding final fee application	0.10	\$750.00		\$75.00
6/17/202	5 Renae Fusco	B160 Fee/Employment Applications	drafting CBCC final fee app	1.50	\$350.00		\$525.00
6/18/202	5 Daniel Egan	B160 Fee/Employment Applications	review and comment on June fee statement exhibits (.9); correspondence with R. Fusco regarding same (.1)	1.00	\$750.00		\$750.00
6/18/202	5 Renae Fusco	B160 Fee/Employment Applications	drafting CBCC final fee app	1.50	\$350.00		\$525.00
	5 Daniel Egan	B160 Fee/Employment Applications	correspondence with R&G regarding fee application	0.10	\$750.00		\$75.00
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June 14, 2025 - July 31, 2025 Case No. 25-10292 (LSS) Invoice No. 19601 6/19/2025 Renae Fusco B160 Fee/Employment Applications drafting CBCC final fee app 1.90 \$350.00 \$665.00 6/20/2025 Daniel Egan **B160 Fee/Employment Applications** correspondence with BRG and R. Fusco regarding fee 0.20 \$750.00 \$150.00 statement \$975.00 6/23/2025 Daniel Egan B160 Fee/Employment Applications review and revise final fee application 1.30 \$750.00 6/25/2025 Daniel Egan **B160 Fee/Employment Applications** review and comment on Ropes final fee application (.5); 0.70 \$750.00 \$525.00 correspondence with Ropes and R. Fusco regarding same (.2)6/25/2025 Renae Fusco **B160 Fee/Employment Applications** edit Ropes final fee app (.6); draft notice re same (.4); efile \$350.00 \$455.00 1.30 same (.2); coordinate service of same (.1) 6/26/2025 Daniel Egan **B160 Fee/Employment Applications** review and comment on BRG final fee application (.6); 1.50 \$750.00 \$1.125.00 correspondence with BRG and R. Fusco regarding same (.2); further review and revise CBCC final fee application (.7)\$850.00 6/26/2025 Mark Desgrosseilliers B160 Fee/Employment Applications Review Chipman final fee application prior to filing same \$85.00 0.10 6/26/2025 Mark Desgrosseilliers B160 Fee/Employment Applications Review BRG application prior to filing same 0.40 \$850.00 \$340.00 6/26/2025 Renae Fusco **B160 Fee/Employment Applications** edit CBCC final fee app (.2); draft notice re CBCC final fee 0.70 \$350.00 \$245.00 app (.3); efile same (.1); coordinate service (.1) 6/26/2025 Renae Fusco **B160 Fee/Employment Applications** draft notice re BRG final fee app 0.50 \$350.00 \$175.00 \$350.00 6/27/2025 Renae Fusco **B160 Fee/Employment Applications** efile BRG final fee app (.2); coordinate service of same (.1) 0.30 \$105.00 7/18/2025 Mark Desgrosseilliers **B160 Fee/Employment Applications** Review final fee applications (.2); prepare for hearing 0.40 \$850.00 \$340.00 regarding same (.2) 7/22/2025 Daniel Egan **B160 Fee/Employment Applications** correspondence with professionals regarding final fee \$750.00 \$150.00 0.20 applications 7/29/2025 Daniel Egan B160 Fee/Employment Applications correspondence with professionals regarding final fee 0.80 \$750.00 \$600.00 hearing (.1); review and revise draft final fee supplement (.3); correspondence with R. Fusco regarding same (.2); review and comment on omnibus fee order (.2) \$350.00 \$140.00 7/29/2025 Renae Fusco **B160 Fee/Employment Applications** edit final fee order 0.40 \$350.00 \$210.00 7/29/2025 Renae Fusco **B160 Fee/Employment Applications** draft CBCC final fee supplement 0.60 \$70.00 7/30/2025 Renae Fusco B160 Fee/Employment Applications edit final fee order 0.20 \$350.00 7/31/2025 Daniel Egan **B160 Fee/Employment Applications** correspondence with BRG regarding fee supplements and 0.30 \$750.00 \$225.00 order correspondence with BRG and CRO regarding \$750.00 \$150.00 6/14/2025 Daniel Egan **B210 Business Operations** 0.20 administrative expenses 6/17/2025 Daniel Egan **B210 Business Operations** review tax issue 0.30 \$750.00 \$225.00 6/18/2025 Daniel Egan **B210 Business Operations** call with taxing authority (.4); analyze issue regarding same 1.10 \$750.00 \$825.00 (.7)

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June 14, 2025 - July 31, 2025 Case No. 25-10292 (LSS) Invoice No. 19601 \$675.00 6/19/2025 Daniel Egan **B210 Business Operations** review account analysis (.4); correspondence with BRG 0.90 \$750.00 regarding same (.1); review APA (.3); correspondence with buyer regarding assumed liabilities (.1) 6/23/2025 Daniel Egan **B210 Business Operations** correspondence with client regarding tax issues (.4); 0.60 \$750.00 \$450.00 correspondence with BRG regarding MORs (.2) 6/24/2025 Daniel Egan **B210 Business Operations** various correspondence with client and BRG regarding tax 0.70 \$750.00 \$525.00 issues MORs and utility account issues 6/25/2025 Daniel Egan **B210 Business Operations** call with utility provider regarding account issue (.3); 0.60 \$750.00 \$450.00 correspondence with client regarding same (.1); correspondence with client regarding status report (.2) \$850.00 \$85.00 6/26/2025 Mark Desgrosseilliers **B210 Business Operations** Review post-sale reports and address filing of same 0.10 7/2/2025 Daniel Egan **B210 Business Operations** correspondence with client and utility regarding deposit 0.20 \$750.00 \$150.00 7/3/2025 Daniel Egan **B210 Business Operations** correspondence with BRG regarding operating reports 0.10 \$750.00 \$75.00 7/7/2025 Daniel Egan **B210 Business Operations** correspondence with BRG and client regarding tax and 0.30 \$750.00 \$225.00 dismissal issues \$825.00 **B210 Business Operations** correspondence with BRG and client regarding dismissal \$750.00 7/8/2025 Daniel Egan 1.10 issues (.2); review operating reports (.7); correspondence with client BRG and R. Fusco regarding same (.2) 7/8/2025 Mark Desgrosseilliers **B210 Business Operations** Review operating reports for May 2025 0.40 \$850.00 \$340.00 7/8/2025 Renae Fusco **B210 Business Operations** efile May MORs 0.30 \$350.00 \$105.00 **B210 Business Operations** \$750.00 \$375.00 7/9/2025 Daniel Egan review tax materials (.4); correspondence with BRG 0.50 regarding same (.1) \$750.00 \$75.00 7/10/2025 Daniel Egan **B210 Business Operations** correspondence with client regarding dissolution issues 0.10 conference call with client and BRG regarding account and \$750.00 \$750.00 7/11/2025 Daniel Egan **B210 Business Operations** 1.00 tax issues (.6); review account analysis (.3); correspondence with BRG and client regarding same (.1) 7/16/2025 Daniel Egan **B210 Business Operations** correspondence with client and BRG regarding tax and 0.20 \$750.00 \$150.00 winddown 7/17/2025 Daniel Egan **B210 Business Operations** correspondence with client and BRG regarding admin 0.70 \$750.00 \$525.00 expenses and winddown (.3); draft update report for Board (.4)\$750.00 \$450.00 7/18/2025 Daniel Egan **B210 Business Operations** review CRO reports (.1); review and revise notices for 0.60 same (.2); correspondence with CRO regarding same and postpetition payments (.3)

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June 14, 2025 - July 31, 2025	Case	No. 25-10292 (LSS)			Invoice No. 19601
7/21/2025 Daniel Egan	B210 Business Operations	review administrative expense issue	0.30	\$750.00	\$225.00
7/22/2025 Daniel Egan	B210 Business Operations	review and comment on drafts of operating reports (.8); correspondence with client and BRG regarding same (.2); correspondence regarding UST fees (.1)	1.10	\$750.00	\$825.00
7/22/2025 Mark Desgrosseilliers	B210 Business Operations	Review operating reports (.1); communications with client concerning same (.1)	0.20	\$850.00	\$170.00
7/24/2025 Daniel Egan	B210 Business Operations	review wind-down issues	0.40	\$750.00	\$300.00
7/28/2025 Daniel Egan	B210 Business Operations	correspondence with BRG regarding administrative expenses and operating reports	0.20	\$750.00	\$150.00
7/29/2025 Daniel Egan	B210 Business Operations	correspondence with client and BRG regarding operating reports and claims (.2); review pending litigation issues (.5)	0.70	\$750.00	\$525.00
7/29/2025 Renae Fusco	B210 Business Operations	finalize & efile June MORs (.5); coordinate service of same (.1)	0.60	\$350.00	\$210.00
7/31/2025 Daniel Egan	B210 Business Operations	correspondence with the client and creditor regarding employment and litigation matters	0.40	\$750.00	\$300.00
7/23/2025 Daniel Egan	B240 Tax Issues	review organization documents regarding wind-down issues (.7); correspondence with M. Desgrosseilliers regarding same (.2)	0.90	\$750.00	\$675.00
7/25/2025 Daniel Egan	B240 Tax Issues	review tax information	0.30	\$750.00	\$225.00

Total

\$23,785.00

39.50