

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)

(Joint Administration Pending)

**NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND
RELATED DOCUMENTS AND (II) AGENDA FOR THE HEARING ON FIRST DAY
MOTIONS SCHEDULED FOR FEBRUARY 27, 2025, AT 1:00 P.M. (ET)²**

This hearing will be conducted in-person, any exceptions must be approved by chambers.

Parties may observe the hearing remotely by registering with the Zoom link below no later than February 26, 2025, at 4:00 p.m.

To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the court's website at www.deb.uscourts.gov.

The deadline to register for remote attendance is 4 PM (prevailing Eastern Time) the business day before the hearing unless otherwise noticed.

After the deadline has passed an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.

PLEASE TAKE NOTICE that on February 26, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the following voluntary petitions (the “Petitions”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

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.

² All motions and other pleadings referenced herein are available online at the following web address: www.veritaglobal.net/FMIAerostructures.



A. Voluntary Petitions:

1. Dynamic Aerostructures LLC; Case No. 25-10292 [[Docket No. 1](#)]
2. Dynamic Aerostructures Intermediate LLC; Case No. 25-10293 [[Docket No. 1](#)]
3. Forrest Machining LLC; Case No. 25-10294 [[Docket No. 1](#)]

PLEASE TAKE FURTHER NOTICE that on February 26, 2025, the Debtors filed the following first day motions and related pleadings (collectively, the “First Day Motions”).

B. First Day Motions:

1. Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [[Docket No. 3](#)].
2. Debtors’ Application for Entry of an Order Appointing Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of The Petition Date [[Docket No. 4](#)].
3. Debtors’ Motion for Entry of Order (I) Authorizing Debtors to File a Consolidated (A) Creditor Matrix and (B) Top 30 Creditors List, (II) Authorizing Redaction of Certain Personal Identification Information, and (III) Granting Related Relief [[Docket No. 5](#)].
4. Debtors’ Motion for Entry of Interim and Final Orders (I) (A) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; And (II) Granting Related Relief [[Docket No. 6](#)].
5. Debtors’ Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations [[Docket No. 7](#)].
6. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and Section 503(b)(9) Claimants, and (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests, and (III) Granting Related Relief [[Docket No. 8](#)].
7. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [[Docket No. 9](#)].
8. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors To (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; and (II) Granting Related Relief [[Docket No. 10](#)].

9. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors To (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [[Docket No. 11](#)].
10. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Existing Business Forms, (II) Authorizing Debtors' Continued Use of Corporate Credit Card Program; And (III) Granting Related Relief [[Docket No. 12](#)].
11. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Financing, (II) Authorizing the Debtors to Use Cash Collateral on a Limited Basis, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[Docket No. 14](#)].
 - i. Declaration of Matthew Guill in Support of Debtors' Motion to Obtain Postpetition Debtor in Possession Financing [[Docket No. 15](#)].

C. First Day Declaration:

12. Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions [[Docket No. 2](#)].

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the First Day Motions is scheduled for **February 27, 2025, at 1:00 p.m. (ET)** at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801 before The Honorable Laurie Selber Silverstein, United States Bankruptcy Judge for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated: February 26, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

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

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

Telephone: (302) 295-0192

weber@chipmanbrown.com

desgross@chipmanbrown.com

-and-

CHIPMAN BROWN CICERO & COLE, LLP

Daniel G. Egan (*pro hac vice* pending)

501 5th Ave. 15th Floor

New York, New York 10017

Telephone: (646) 741-5529

egan@chipmanbrown.com

-and-

ROPES & GRAY LLP

Gregg M. Galardi (No. 2991)

1211 Avenue of the Americas

New York, New York 10036

Telephone: (212) 596-9000

Facsimile: (212) 596-9090

gregg.galardi@ropesgray.com

Proposed Counsel to the Debtors and Debtors in Possession