## IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

Chapter 11

WESCO AIRCRAFT HOLDINGS, INC., et al., 1

Case No. 23-90611 (DRJ)

Debtors.

(Jointly Administered)

## LANGUR MAIZE, L.L.C.'S AMENDED WITNESS AND EXHIBIT LIST FOR HEARING ON JULY 10, 2023 AT 3:00 PM (CENTRAL)

Langur Maize, L.L.C. ("<u>Langur Maize</u>") files this amended witness list and exhibit list for the hearing scheduled for July 10, 2023, at 3:00 p.m. (Central).

#### WITNESSES

Langur Maize may call the following witnesses at the hearing:

- 1. Any witness listed by any other party;
- 2. Rebuttal witnesses as necessary.

Langur Maize reserves the right to cross-examine any witness called by any other party.

#### **EXHIBITS**

EXHIBIT	DESCRIPTION	MARKED	OFFERED	<b>OBJECTION</b>	ADMITTED
1.	1L and 1.25L RSA Negotiation Side by Side Comparison (the "Cleansing Materials")				
2.	Email from Benjamin Schak				

The Debtors operate under the trade name Incora and have previously used the trade names Wesco, Pattonair, Haas, and Adams Aviation. A complete list of the Debtors in the chapter 11 cases, with each one's federal tax identification number and the address of its principal office, is available on the website of the Debtors' noticing agent at http://www.kccllc.net/Incora/. The service address for each of the Debtors is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

	(Milbank) to Chané Buck (Jones Day) re: Cleansing Materials dated July 9, 2023		
3.	Any document or pleading filing in the above captioned chapter 11 cases		
4.	Any exhibit identified by any other party		
5.	Any exhibit necessary for impeachment and/or rebuttal purposes		

DATED: July 10, 2023

### **JONES DAY**

/s/ Michael C. Schneidereit
Michael C. Schneidereit (pro hac vice)
Nicholas Walter (pro hac vice)
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3939
mschneidereit@jonesday.com
ncewalter@jonesday.com

-and-

Bruce Bennett (*pro hac vice*) 555 South Flower St., Fiftieth Floor Los Angeles, CA 90071 Telephone: (213) 489-3939 bbennett@jonesday.com

Counsel for Langur Maize, L.L.C.

## **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was served by electronic delivery on all persons and entities receiving ECF notice in this case on July 10, 2023.

/s/ Michael C. Schneidereit
Michael C. Schneidereit (pro hac vice)

## **EXHIBIT 1**

# 1L and 1.25L RSA Negotiation Filed in TXSB on 07/10/23 Page 2 of 2 Side by Side

		1.25L Proposal ( <i>May</i> 19 <sup>th</sup> )	1L Proposal (May 24 <sup>th</sup> )	Company Proposal (May 26 <sup>th</sup> )
	Common Equity to 1.25L	> 9.0%	<ul> <li>4.5%</li> <li>Or \$28mm cash at the option of the First Lien Noteholder Group</li> </ul>	> 5.0% - N/A
	Warrants to 1.25L	<ul> <li>&gt; 5.0%</li> <li>&gt; 5-year tenor</li> <li>&gt; Struck at par plus accrued plus makewhole with Black Scholes Protection</li> </ul>	> No warrants to the 1.25L	> Agree
(	Other Terms	<ul> <li>Emergence debt of no more than \$600mm</li> <li>Agree to prior 1L proposal of 2.0% warrants to the Unsecureds, struck at par plus accrued (including makewhole) through the 1.25L</li> <li>Any further economics will be subject to mutual dilution</li> </ul>	> N/A > Agree	<ul><li>&gt; Emergence debt of no more than \$700mm</li><li>&gt; Agree</li></ul>

## **EXHIBIT 2**

## **Buck, Chane**

From: Schak, Benjamin <bschak@milbank.com>

**Sent:** Sunday, July 9, 2023 9:39 PM

**To:** Buck, Chane; Fendrych, Charlie; Porat, Daniel; Khalil, Samuel

Cc: Schneidereit, Michael C.; Walter, Nicholas C.E.; Leblanc, Andrew; Vora, Samir

**Subject:** Re: Wesco

#### This Message Is From an External Sender

If you are concerned about the message's content, highlight the email in your inbox and click "Report Suspicious" in the Outlook ribbon -or- contact 6Help.

No objection. Thank you for checking in.

Best, Ben

From: Buck, Chane <cbuck@jonesday.com> Sent: Sunday, July 9, 2023 8:04:46 PM

**To:** Schak, Benjamin <bschak@milbank.com>; Fendrych, Charlie <CFendrych@milbank.com>; Porat, Daniel

<dporat@milbank.com>; Khalil, Samuel <SKhalil@milbank.com>

Cc: Schneidereit, Michael C. <mschneidereit@jonesday.com>; Walter, Nicholas C.E. <ncewalter@jonesday.com>

Subject: [EXT] Wesco

Ben,

We understand that the attached document was posted by the company to the public-side Wesco bondholder site on Intralinks on or around June 9 to publicly cleanse the information contained within it.

As such, we assume the attached is a public document that is not subject to any confidentiality restrictions and that there is no issue with our using it in open court or filing it on the docket tomorrow.

Please confirm the above as soon as possible. We will assume you have no objection if we do not hear back from you.

Т	h	а	n	ks.	
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Chané

Chané Buck Associate

JONES DAY® - One Firm Worldwide<sup>sM</sup>

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\* Admitted in California only

Not admitted in New York

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