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

IN RE:	§	CHAPTER II
	§	
WESCO AIRCRAFT HOLDINGS, INC.,	§	CASE NO. 23-90611
et al., ¹	§	
DEBTORS.	§	(Jointly Administered)

NORMA PENNSYLVANIA, INC.'S APPLICATION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM

This Application seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the Application should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the Application and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

NORMA Pennsylvania, Inc., a NORMA Group Company, and its affiliates (collectively, "NORMA") by and through its undersigned counsel, hereby requests the entry of an order, pursuant to Bankruptcy Code § 503(b)(9), allowing NORMA an administrative expense claim in the amount of \$21,793.12. In support of this, NORMA states as follows:

I. JURISDICTION

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This

U.S.C. 503(B)(9)

APPLICATION OF NORMA PENNSYLVANIA, INC. FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 2390611250301000000000001

¹ A complete list of the Debtors in these 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/.

- 2. Application is a core proceeding under 28 U.S.C. §157(b)(2)(A) and (B).
- 3. Venue in the Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

II. FACTUAL BACKGROUND

- 4. On June 1, 2023 (the "<u>Petition Date</u>"), the Debtor and its affiliates filed for bankruptcy protection under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the "<u>Bankruptcy Court</u>").
 - 5. NORMA provides the Debtor with worm-drive hose clamps and related products.
- 6. The Debtors received a portion of NORMA's products ("Goods") within twenty (20) days of the Petition Date in the ordinary course of the Debtors' business and, therefore, the amounts the Debtor owes NORMA for these Goods constitute an administrative claim under 11 U.S.C. § 503(b)(9). The following invoices represent Goods NORMA provided to the Debtor within the twenty (20) days prior to the Petition Date:

Inv#	Date	Original Amount	Outstanding Amount
161773	5/12/2023	\$850.82	\$850.82
161956	5/16/2023	\$8,038.92	\$8,038.92
162186	5/16/2023	\$8,700.50	\$8,700.50
162412	5/18/2023	\$929.78	\$929.78
163484	5/26/2023	\$2,959,90	\$2,959.90
163690	5/26/2023	\$438.20	\$438.20
Total			\$21,918.12

- 7. On October 9, 2023, NORMA timely filed a proof of claim which included a claim entitled to priority under 11 U.S.C. §507(a)(2) and 503(b)(9) in the amount of \$21,793.12.
- 8. On October 30, 2024, following the Debtors' Fourth Omnibus Objection to Claims [Docket No. 2172], the Court entered an Order Sustaining the Debtors' Fourth Omnibus Objection to Claims (Docket No. 2290, the "Order Sustaining Debtors' Objection").

- 9. Schedule 4 of the Order Sustaining Debtors' Objection includes NORMA's priority claim reclassified in the amount of \$21,793.12.
- 10. On December 27, 2024, the Debtors confirmed the Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc. et al. (Docket No. 2517, the "Plan").
- 11. On January 31, 2025, the Debtor's filed a notice of effective date ("<u>Effective Date</u>") of the Plan (the Docket No. 2615, "<u>Notice of Effective Date</u>").
- 12. The Notice of Effective Date provides all requests for payment of general administrative expenses that accrued on or before the Effective Date must be filed with the claims agent and served on counsel for the Debtors, counsel for the committee, and counsel for the first lien noteholder group by the date that is 30 calendar days after the later of (a) the Effective Date and (b) the date on which such claim becomes due and payable by the Debtors in the ordinary course of business.
- 13. Pursuant to the Notice of Effective Date, NORMA's Application for Administrative Expense Claim is timely filed.

III. RELIEF REQUESTED

14. NORMA respectfully requests that this Court allow NORMA's administrative expense claim in the reclassified amount of \$21,793.12 for the Goods provided pursuant to section 503(b)(9) of the Bankruptcy Code.

IV. BASIS FOR RELIEF

15. Section 503(b)(9) of the Bankruptcy Code provides, in pertinent part, that:

After notice and a hearing, there shall be allowed, administrative expenses ... [for] the value of any goods received by the debtor within 20 days before the date of commencement of a case under

this title in which the goods have been sold to the debtor in the ordinary course of such debtor's business. 11 U.S.C. § 503(b)(9).

16. As evidenced above, during the 20 days preceding the Petition Date, the Debtors

received from NORMA the Goods valued in aggregate at \$21,793.12. NORMA sold the Goods to

the Debtors in the ordinary course of the Debtors' business, and NORMA has not yet received

payment for the Goods. NORMA is accordingly entitled to an allowed administrative expense

claim against the Debtors in the aggregate amount of \$21,793.12.

17. WHEREFORE, NORMA respectfully requests that the Court enter an order

substantially in the form attached hereto as Exhibit A: (i) allowing NORMA's administrative

expense claim in the amount of \$21,793.12 pursuant to section 503(b)(9) of the Bankruptcy Code;

and (ii) granting such other and further relief as may be just and proper under the circumstances.

Dated: March 2, 2025

Respectfully submitted,

/s/ Jason M. Rudd

Jason M. Rudd, Tex. Bar No. 24028786 jason.rudd@wickphillips.com

Wick Phillips Gould & Martin, LLP

3131 McKinney Avenue, Suite 500

Dallas, Texas 75204

Phone: (214) 692-6200

Fax: (214) 692-6255

COUNSEL FOR NORMA PENNSYLVANIA,

INC.

CERTIFICATE OF SERVICE

I certify that on March 2, 2025, a true and correct copy of the foregoing document was served by electronic transmission via the Court's CM/ECF system upon all parties registered to receive electronic notice in this bankruptcy case, including the following counsel for the Debtors, the United States Trustee, counsel for the unsecured creditors committee, and counsel for the first lien noteholders group as listed below.

Dennis F. Dunne Samuel A. Khalil Benjamin M. Schak MILBANK LLP 55 Hudson Yards New York, NY 10001

Charles A Beckham, Jr Kelli S. Norfleet HAYNES AND BOONE, LLP 1221 McKinney Street, Suite 4000 Houston, TX 77010-2007

Andrew Jiménez U.S. Department of Justice United States Trustee Program 515 Rusk Street, Suite 3516 Houston, TX 77002

Charles R. Gibbs Jack G. Haake MCDERMOTT WILL & EMERY LLP 2501 North Harwood Street, Suite 1900 Dallas, TX 75201-1664 John F. Higgins M. Shane Johnson Megan Young-John Bryan L. Rochelle PORTER HEDGES LLP 1000 Main Street, 36th Floor Houston, Texas 77002-6341

Damian S. Schaible Angela Libby Stephanie Massman DAVIS POLK & WARDWELL LLP 450 Lexington Avenue New York, NY 10017

Lorenzo Marinuzzi
Theresa A. Foudy
Michael Birnbaum Benjamin Butterfield
Raff Ferraioli
MORRISON & FOERSTER LLP
250 West 55th Street
New York, NY 10019-9601

/s/ Jason M. Rudd

Jason M. Rudd

EXHIBIT A

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

IN RE:	§	CHAPTER 11
	c	

WESCO AIRCRAFT HOLDINGS, INC., § CASE NO. 23-90611 et al.,¹

DEBTORS. § (Jointly Administered)

ORDER GRANTING NORMA PENNSYLVANIA, INC.'S APPLICATION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM

COMES BEFORE this Court, NORMA Pennsylvania, Inc.'s Application for entry of an order pursuant to Bankruptcy Code § 503(b)(9) allowing an administrative expense claim in the amount of \$21,793.12; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having determined that the legal and factual bases as set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is ORDERED THAT:

- 1. The Application is granted as set forth herein.
- 2. NORMA Pennsylvania, Inc. has an allowed administrative expense claim in the amount of \$21,793.12 pursuant to section 503(b)(9) of the Bankruptcy Code.

¹ A complete list of the Debtors in these 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/.

- 3. The Debtors or Reorganized Debtors² shall promptly pay NORMA Pennsylvania Inc.'s 503(b)(9) claim in accordance with the terms set forth in the *Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc. et al.* [Docket No. 2517].
- 4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed:	,2025.
	Marvin Isgur
	United States Bankruptcy Judge

² As defined in the Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc. et al.