

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

*In re*

**WESCO AIRCRAFT HOLDINGS, INC.,<sup>1</sup>**  
Reorganized Debtor.

Case No. 23-90611 (MI)  
Chapter 11  
(Jointly Administered)

**REORGANIZED DEBTOR'S UNOPPOSED  
MOTION FOR ENTRY OF AN ORDER EXTENDING  
THE GENERAL ADMINISTRATIVE EXPENSES  
OBJECTION DEADLINE AS TO THE ADMINISTRATIVE  
EXPENSE APPLICATION OF ROLLS-ROYCE PLC ET AL.**

**(RELATED TO DOCKET NOS. 2697, 2731)**

<sup>1</sup> The above-captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.



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The above-captioned reorganized debtor (the “**Reorganized Debtor**” and, together with its subsidiaries, “**Incora**”) respectfully states as follows.

### RELIEF REQUESTED

1. By this motion (the “**Motion**”), the Reorganized Debtor seeks entry of an order extending the General Administrative Expenses Objection Deadline (the “**Objection Deadline**”), as defined in the *Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc. et al.* (Dkt. No. 2550, Ex. A, the “**Plan**”),<sup>2</sup> through September 30, 2025, solely as to *Rolls-Royce Plc, Rolls-Royce Deutschland & Co Kg, and Rolls-Royce Singapore (Pte) Ltd’s Application for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. §§ 503(b) and 507(a)(2)* (Dkt. No. 2697, the “**Rolls-Royce Claim**”). A proposed form of order (the “**Proposed Order**”) is attached to this Motion.

2. The principal statutory bases for this Motion are section 105 and 503 of title 11 of the U.S. Code (the “**Bankruptcy Code**”).

### JURISDICTION AND VENUE

3. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334 and Article XI(1) of the Plan. This Motion is a core proceeding under 28 U.S.C. § 157(b). Venue in the Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### BASIS FOR RELIEF

4. The Plan was confirmed on December 27, 2024, and the Effective Date under the Plan occurred on January 31, 2025. *See* Dkt. No. 2615.

5. Rolls-Royce plc, Rolls-Royce Deutschland & Co KG, and Rolls-Royce Singapore (Pte) Ltd (collectively, “**Rolls-Royce**”) filed a timely administrative expense application, the Rolls-Royce Claim, on February 28, 2025.

<sup>2</sup> Capitalized terms used but not defined in this Motion bear the meanings ascribed to them in the Plan.

6. Under the Plan, the deadline for the Reorganized Debtor to object to the Rolls-Royce Claim is “the later of (a) 180 days after the Effective Date and (b) such later date as may be set by the Bankruptcy Court upon a motion by the Reorganized Debtors.” Plan, Art. I.127. The filing of a motion to extend the Objection Deadline automatically tolls the Objection Deadline while the motion is under consideration. *See id.*

7. Incora and Rolls-Royce have been working to resolve the issues presented in the Rolls-Royce Claim, which relate to technically complex obligations under a longstanding logistics services agreement. Both sides believe that a consensual resolution can be achieved and that an extension of the Objection Deadline through September 30, 2025 would facilitate a cost-effective resolution without need for judicial intervention. Accordingly, Rolls-Royce has consented to entry of the Proposed Order.

#### **NOTICE**

8. Notice of this Motion will be provided to (a) all parties in interest listed on the master service list maintained by the Reorganized Debtor pursuant to Article XII.C. of the Plan; and (b) counsel to Rolls-Royce. The Reorganized Debtor respectfully submits that no further notice is required under the circumstances.

*[Remainder of page intentionally blank]*

Upon the foregoing Motion, the Reorganized Debtor respectfully requests that the Court (a) enter an order granting this Motion, substantially in the form attached to this Motion and (b) grant such other relief as is just and proper.

Dated: July 28, 2025

Respectfully submitted,

/s/ Charles A. Beckham, Jr.

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*Counsel to the Reorganized Debtor*

### **CERTIFICATE OF SERVICE**

I certify that, on July 28, 2025, a true and correct copy of the foregoing document was served through the Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas and will be served as set forth in the Affidavit of Service to be filed by the Reorganized Debtor's noticing agent.

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.

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**ORDER EXTENDING  
THE GENERAL ADMINISTRATIVE EXPENSES  
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<sup>1</sup> The above-captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

Upon the motion (the “**Motion**”), of the above-captioned reorganized debtor (the “**Reorganized Debtor**”), for entry of an order (this “**Order**”) extending the General Administrative Expenses Objection Deadline, as defined in the *Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc. et al.* (Dkt. No. 2550, Ex. A, the “**Plan**”), through September 30, 2025, as to *Rolls-Royce Plc, Rolls-Royce Deutschland & Co Kg, and Rolls-Royce Singapore (Pte) Ltd’s Application for Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. §§ 503(b) and 507(a)(2)* (Dkt. No. 2697, the “**Rolls-Royce Claim**”); and the Court having jurisdiction to decide the Motion and to enter this Order pursuant to 28 U.S.C. § 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, such notice being adequate and appropriate under the circumstances; and after notice and a hearing, as defined in section 102 of the Bankruptcy Code; and the Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Order; and it appearing that entry of this Order is in the best interests of the Reorganized Debtor’s estates; it is hereby **ORDERED** that:

1. The General Administrative Expenses Objection Deadline (as defined in the Plan) is extended through September 30, 2025, solely as to the Rolls-Royce Claim.
2. The Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: July [●], 2025

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THE HONORABLE MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE