

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

In re

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**REORGANIZED DEBTORS'
OBJECTION TO PROOFS OF CLAIM #536, #537,
AND #538 FILED BY HAUN WELDING SUPPLY INC.**

(RECLASSIFIED CLAIMS)

This is an objection to your claims. This objection asks the Court to reclassify each of those claims. If you do not file a response at or before 4:00 p.m. (Central Time) on November 14, 2025, your claim may be reclassified without a hearing.

¹ 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***” and, together with its affiliated former debtors and their successors, as applicable, the “***Reorganized Debtors***”) respectfully states as follows.

RELIEF REQUESTED

1. By this omnibus objection (the “***Objection***”), the Reorganized Debtors seek entry of an order, reclassifying each of the claims (the “***Haun Welding Claims***”) listed on **Schedule 1** to the proposed form of order (the “***Proposed Order***”) that is attached to this Objection on the grounds that each such claim was incorrectly or improperly classified as secured.

2. The principal bases for this Objection are section 502(a) of title 11 of the U.S. Code (the “***Bankruptcy Code***”), Rule 3007 of the Federal Rules of Bankruptcy Procedures (the “***Bankruptcy Rules***”), Rule 3007-1 of the Bankruptcy Local Rules of the U.S. Bankruptcy Court for the Southern District of Texas (the “***Local Rules***”), and the Court’s *Order Approving Claim Objection and Settlement Procedures* [Dkt. No. 918] (the “***Claim Procedures Order***”). This Objection is supported by the *Declaration of Christopher Kelly in Support of the Reorganized Debtors’ Objection to Proofs of Claim #536, #537, and #538 Filed by Haun Welding Supply Inc.* (the “***Kelly Declaration***”), attached to this Objection as **Exhibit A**.

3. Each objection to the Haun Welding Claims is intended to constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. If any claimant files and properly serves a timely response to this Objection, the Debtors will request the Court to schedule a hearing on that response. In that case, the Debtors reserve the right to file a certificate of no objection with respect to the Haun Welding Claims for which no response has been filed or served.

JURISDICTION AND VENUE

4. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. 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.

BACKGROUND

5. On September 11, 2023, the Court entered the *Order (I) Setting Bar Dates for Filing Proofs of Claim, (II) Approving the Form of Proofs of Claim and the Manner of Filing, (III) Approving Notice of Bar Dates, and (IV) Granting Related Relief* [Dkt. No. 750] (the “**Bar Date Order**”). The Bar Date Order established certain deadlines for the filing of proofs of claim in these chapter 11 cases. On November 3, 2023, the Court entered the Claims Procedures Order, which established procedures for the Debtors to object to multiple claims within a single objection.

6. The Debtors and their advisors are comprehensively reviewing and reconciling all claims, including the Haun Welding Claims. To date, the claims register maintained by the Debtors’ claims agent indicates that approximately 2,100 proofs of claim have been filed against the Debtors. To determine the validity of the asserted claims, the Debtors and their advisors are reviewing the information provided in each proof of claim and comparing that information to the Debtors’ books and records.

BASIS FOR RELIEF

7. Section 502(a) of the Bankruptcy Code provides that any claim for which a proof of claim has been filed shall be deemed allowed unless a party in interest objects. 11 U.S.C. § 502(a). A properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and amount of the claim for purposes of section 502(a). *See* Fed. R. Bankr. P. 3001(f); *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). However, a proof of claim is entitled to the presumption of validity only until an objecting party produces evidence to negate its *prima facie* validity. *See In re Avaya, Inc.*, 608 B.R. 366, 369-370 (Bankr. S.D.N.Y. 2019).

8. If an objection is filed, the court, upon notice and a hearing, must determine the validity, amount and priority of the asserted claim. *See* 11 U.S.C § 502(b). Once the objecting party refutes an allegation critical to the claim, the burden reverts to the claimant to prove up its claim by a preponderance of the evidence. *See Allegheny*, 954 F.2d at 173. In other words, once the *prima facie* validity has been rebutted, “it is for the claimant to prove his claim, not for the objector to disprove it.” *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

9. A debtor in possession has the duty to object to any improperly asserted claim. *See* 11 U.S.C. § 1106(a)(1). The Claim Procedures Order (together with Bankruptcy Rule 3007(d) (1)) permits the Debtors to file an objection to more than one claim when all claims were filed by the same entity.

10. The Reorganized Debtors object to the classification of the Haun Welding Claims. As set forth herein and in the Kelly Declaration, the Reorganized Debtors and their advisors thoroughly reviewed the claims register and believe that, as identified on **Schedule 1**, for the portions of the claims that were asserted as secured, the claimant, Haun Welding Supply Inc. (“*Haun Welding*”) was unable to establish identifiable collateral nor demonstrated perfection of a security interest. In particular, Haun Welding asserts that its claims are secured by high pressure cylinders that the Debtors routinely rotate in and out of use. A prepetition search of UCC filings did not reveal any UCC-1 security interest in favor of Haun Welding, nor does the proof of claim attach any evidence of a security interest. Additionally, after a review of the Debtors’ operations and business practices with respect to items of the type in which Haun Welding asserts an interest, it is unlikely that any of Haun Welding’s Petition-Date collateral (or identifiable proceeds thereof) remained in the Debtors’ possession as of emergence. Haun Welding never sought adequate protection during the chapter 11 cases. Therefore, Haun Welding cannot establish that its claim is secured by any identifiable collateral, and its claims should be classified as unsecured.

RESERVATION OF RIGHTS

11. The Reorganized Debtors reserve the right to modify, supplement, or amend this Objection as it pertains to any of the Haun Welding Claims. Nothing in this Objection shall be understood as (a) a finding as to the validity of any claim against any of the Reorganized Debtors, (b) a waiver of the right of the Reorganized Debtors to dispute any claim against any of the now-Reorganized Debtors on any grounds whatsoever at a later date, (c) a requirement for any Reorganized Debtors to pay any claim, (d) a waiver of any claim or cause of action any of the Reorganized Debtors or other parties of interest may have against any entity; (e) a waiver of any rights of the Reorganized Debtors under the Bankruptcy Code or other applicable law; (f) an

implication or admission that any particular claim is of a type specified or defined in the Objection or any order granting the relief requested in the Objection; or (g) an implication, admission, or concession (i) that any particular claim is of a type specified or defined in this Objection or any lien, security interest, or other encumbrance on property of any of the Reorganized Debtors or (ii) that any lien, security interest, other encumbrance on property of any of the Reorganized Debtors or right of setoff is valid, enforceable, or perfected (and the Reorganized Debtors and all other parties in interest expressly reserve and preserve their rights to contest or seek avoidance of the same).

NOTICE

12. Pursuant to Article XII.C of the Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc. [Dkt. No. 2517] (the “*Plan*”),² the Claims Procedures Order, and Rule 3007 of the Bankruptcy Rules, notice of this Objection will be provided (a) by filing on the Court’s Electronic Court Filing system, (b) by mail, to the Office of the U.S. Trustee, (c) by email, to counsel to the General Unsecured Claims Observer, the First Lien Noteholder Group, and those parties that, following the Effective Date, have filed renewed requests for notices pursuant to Bankruptcy Rule 2002, and (d) by individualized notice, in the form appended to the Claims Procedures Order via mail, to each claimant and on each such claimant’s counsel, if listed on the Claimant’s Proof of Claim, affected by this Objection. The Reorganized Debtors respectfully submit that no further notice is required under the circumstances

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² Capitalized terms used but not defined in this Objection have the meanings ascribed to them in the Plan.

Upon the foregoing Objection, the Debtors respectfully request that the Court (a) enter an order sustaining this Objection, substantially in the form attached to this Objection and (b) grant such other relief as is just and proper.

Dated: October 24, 2025
Houston, Texas

Respectfully submitted,

/s/ Charles A. Beckham, Jr.

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Counsel to the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that, on October 24, 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 Debtors' noticing agent.

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.

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

In re

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

Reorganized Debtors.

Case No. 23-23-90611 (MI)

Chapter 11

(Jointly Administered)

**ORDER SUSTAINING THE
REORGANIZED DEBTORS'
OBJECTION TO PROOFS OF CLAIM #536, #537
AND #538 FILED BY HAUN WELDING SUPPLY INC.**

¹ 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 *Debtors' Objection to Proofs of Claim #536, #537 and #538 Filed by Haun Welding Supply Inc.* (the “**Objection**”);² and the Court having jurisdiction to decide the Objection and to enter this Order pursuant to 28 U.S.C. § 1334; and consideration of the Objection 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 Objection 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 Debtors' estates; it is hereby **ORDERED** that:

1. Each Haun Welding Claim identified on **Schedule 1** attached to this Order is reclassified as set forth in **Schedule 1**.

2. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, the terms of this Order shall be immediately effective and enforceable upon its entry.

3. The Reorganized Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Order, including by updating the claims register to reflect the relief granted by this Order.

4. Except as provided in this Order, nothing in this Order shall be deemed (a) a finding as to the validity of any claim against any of the Reorganized Debtors, (b) a waiver of the right of the Reorganized Debtors to dispute any claim against any of the Reorganized Debtors on any grounds whatsoever at a later date, (c) a requirement for any of the Reorganized Debtors to pay any claim, (d) a waiver of any claim or cause of action any of the Reorganized Debtors or other parties of interest may have against any entity; (e) a waiver of any rights of the Reorganized Debtors under the Bankruptcy Code or other applicable law; (f) an implication or admission that any particular claim is of a type specified or defined in the Objection or any order granting the

² Capitalized terms used but not defined in this Order have the meanings ascribed to them in the Objection.

relief requested in the Objection; or (g) an implication, admission, or concession (i) that any particular claim is of a type specified or defined in this Objection or any lien, security interest, or other encumbrance on property of any of the Reorganized Debtors or (ii) that any lien, security interest, other encumbrance on property of any of the Reorganized Debtors or right of setoff is valid, enforceable, or perfected (and the Reorganized Debtors and all other parties in interest expressly reserve and preserve their rights to contest or seek avoidance of the same).

5. The Court retains jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____
Houston, Texas

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

**SCHEDULE 1 TO
HAUN WELDING CLAIM OBJECTION ORDER
RECLASSIFIED CLAIMS**

Case 23-90611 Document 2952-1 Filed in TXSB on 10/24/25 Page 5 of 5
Wesco Aircraft Holdings, Inc. Case No. 23-90611 (MI) Objection to Proofs of Claim #536,
#537, and #538 Filed by Haun Welding Supply Inc. - Schedule 1 Reclassified Claims

ASSERTED

MODIFIED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	HAUN WELDING SUPPLY INC 5921 COURT STREET RD SYRACUSE, NY 13206	536	Haas Group International, LLC	503(b)(9)	\$600.88	Haas Group International, LLC	503(b)(9)	\$600.88
			Haas Group International, LLC	Secured	\$71,500.00	Haas Group International, LLC	Unsecured	\$81,075.43
			Haas Group International, LLC	Unsecured	\$9,575.43			
						Subtotal		\$81,676.31
				Subtotal	\$81,676.31			

Reason: Proof of claim asserts that a portion is secured by high pressure cylinders. The cylinders are provided by the Claimant and used in creation of parts for customers by the Reorganized Debtors. Delivery of cylinders occurs weekly and involves a constant rotation of old and new cylinders. The Reorganized Debtors do not hold the cylinders for long periods of time as this provides no added benefit. The priority is modified as the Claimant is unable to establish identifiable collateral and has not demonstrated a perfection of a security interest.

2	HAUN WELDING SUPPLY INC 5921 COURT STREET RD SYRACUSE, NY 13206	537	Haas Group International, LLC	503(b)(9)	\$6,286.20	Haas Group International, LLC	503(b)(9)	\$6,286.20
			Haas Group International, LLC	Secured	\$76,000.00	Haas Group International, LLC	Unsecured	\$92,000.44
			Haas Group International, LLC	Unsecured	\$16,000.44			
						Subtotal		\$98,286.64
				Subtotal	\$98,286.64			

Reason: Proof of claim asserts that a portion is secured by high pressure cylinders. The cylinders are provided by the Claimant and used in creation of parts for customers by the Reorganized Debtors. Delivery of cylinders occurs weekly and involves a constant rotation of old and new cylinders. The Reorganized Debtors do not hold the cylinders for long periods of time as this provides no added benefit. The priority is modified as the Claimant is unable to establish identifiable collateral and has not demonstrated a perfection of a security interest.

3	HAUN WELDING SUPPLY INC 5921 COURT STREET RD SYRACUSE, NY 13206	538	Haas Group International, LLC	503(b)(9)	\$370.04	Haas Group International, LLC	503(b)(9)	\$370.04
			Haas Group International, LLC	Secured	\$14,000.00	Haas Group International, LLC	Unsecured	\$16,334.33
			Haas Group International, LLC	Unsecured	\$2,334.33			
						Subtotal		\$16,704.37
				Subtotal	\$16,704.37			

Reason: Proof of claim asserts that a portion is secured by high pressure cylinders. The cylinders are provided by the Claimant and used in creation of parts for customers by the Reorganized Debtors. Delivery of cylinders occurs weekly and involves a constant rotation of old and new cylinders. The Reorganized Debtors do not hold the cylinders for long periods of time as this provides no added benefit. The priority is modified as the Claimant is unable to establish identifiable collateral and has not demonstrated a perfection of a security interest.

EXHIBIT A TO HAUN WELDING CLAIM OBJECTION

KELLY DECLARATION

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

In re

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**DECLARATION OF CHRISTOPHER KELLY
IN SUPPORT OF THE REORGANIZED DEBTORS'
OBJECTION TO PROOFS OF CLAIM #536, #537,
AND #538 FILED BY HAUN WELDING SUPPLY INC**

(RECLASSIFIED CLAIMS)

¹ 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.

I, Christopher Kelly, make this declaration pursuant to 28 U.S.C. § 1746 and state as follows:

BACKGROUND

1. I am a Managing Director with Alvarez & Marsal North America, LLC (together with its wholly-owned subsidiaries and independent contractors and also with employees of its professional service provider affiliates, all of which are wholly-owned by its parent company and employees, “**A&M**”), a restructuring advisory services firm with multiple offices throughout the country. Since 1983, A&M has been a global provider of turnaround advisory services to companies in crisis or in need of performance improvement in specific financial and operational areas. A&M’s debtor advisory services have encompassed a wide range of activities targeted at stabilizing and improving a company’s financial position, including: developing and validating forecasts and business plans; monitoring and managing cash, cash flow, and supplier relationships; assessing and recommending cost reduction strategies; and designing and negotiating financial restructuring packages.

2. I received a Bachelor’s Degree in Commerce from the McIntire School of Commerce at the University of Virginia and a Masters of Business Administration from Columbia University. I have more than 17 years of restructuring experience. I specialize in the development, evaluation and execution of restructuring plans; cash flow forecasting and liquidity management; and operational performance improvement. I have assisted clients across a variety of industries, including financial services, government contracting, transportation and logistics, manufacturing, business services, and retail and apparel.

3. In addition to acting as the financial advisor to the Reorganized Debtors in these cases, some of my other most notable publicly disclosed restructuring assignments include Anna Holdings Inc. (Acosta), Arcapita Investments, Intelsat S.A., and Lehman Brothers Holdings Inc. I am a senior member of the A&M team advising the Reorganized Debtors. I have worked closely with the Reorganized Debtors’ management and other professionals with respect to the Reorganized Debtors’ restructuring efforts, including assisting the Reorganized Debtors in

preparing cash flow projections, budgets, and other financial information. I am generally familiar with the Reorganized Debtors' day-to-day operations, financing arrangements, business affairs, and accounting records that reflect, among other things, the Reorganized Debtors' liabilities and the amount thereof owed to their creditors as June 1, 2023 (the "**Petition Date**"). I have read the Reorganized Debtors' Objection to Proofs of Claim #536, #537, and #538 Filed by Haun Welding Supply Inc. (Reclassified Claims) (the "**Objection**"),² and exhibits attached thereto, and I submit this supplemental declaration in support thereof.³

4. In my capacity as an advisor to the Debtors, I am authorized to submit this declaration (this "**Declaration**") in support of the *Reorganized Debtors' Objection to Proofs of Claim #536, #537, and #538 Filed by Haun Welding Supply Inc.* (the "**Objection**").

5. To the best of my knowledge, information, and belief, and after investigation and review, the assertions made in the Objection are accurate. In evaluating the Haun Welding Claims, the Reorganized Debtors and their advisors thoroughly reviewed the claims register, the relevant proofs of claim, as well as the supporting documentation provided by the claimant. To the best of my knowledge, the amounts reflected by the Reorganized Debtors in the claims register are accurate. As such, I believe that the reclassification of the Haun Welding Claims on the terms set forth in the Objection is appropriate in each instance, for the specific factual reasons set forth below.

THE HAUN WELDING CLAIMS

6. On July 21, 2023, Haun Welding Supply Inc ("**Haun Welding**") filed Claim Nos. 536, 537, and 538 for \$81,676.31, \$98,286.64, and \$16,704.37, respectively (the "**Haun Welding Claims**"). Haun Welding asserted secured status for a certain portion of each claim—\$71,500 worth of goods for Claim No. 536, \$76,000 for Claim No. 537, and \$14,000 for Claim No. 538.

² Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

³ Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at A&M and are based on information provided by them.

The Reorganized Debtors purchase high pressure cylinders containing various gases (e.g. propane, nitrogen argon, etc.) from Haun Welding to produce customer parts. Delivery occurs weekly and involves a constant rotation of old and new cylinders. The Reorganized Debtors do not hold the cylinders for long periods of time as this provides no added benefit. A prepetition search of UCC filings did not reveal any UCC-1 security interest in favor of Haun Welding, nor does the proof of claim attach any evidence of a security interest. Additionally, after a review of the Debtors' operations and business practices with respect to items of the type in which Haun Welding asserts an interest, it is unlikely that any of Haun Welding's Petition-Date collateral remained in the Debtors' possession as of emergence. Haun Welding is therefore unable to establish that its claim is secured by any identifiable collateral. For these reasons, the foregoing portions of the claims that were asserted as secured should be reclassified to unsecured, as reflected in the "Modified" column on **Schedule 1**.

[Remainder of page intentionally blank]

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: October 24, 2025

/s/ Christopher Kelly

Christopher Kelly