

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

In re

WESCO AIRCRAFT HOLDINGS, INC.,¹
Reorganized Debtor.

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

**REORGANIZED DEBTOR'S UNOPPOSED
MOTION FOR ENTRY OF AN ORDER EXTENDING
THE CLAIMS OBJECTION DEADLINE AS TO
PROOF OF CLAIM #2402 OF LMI AEROSPACE, INC.**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <http://ecf.txsb.uscourts.gov/> within 21 days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within 21 days from the date this motion is filed. Otherwise, the Court may treat this pleading as unopposed and grant the relief requested.

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**”) respectfully states as follows.

RELIEF REQUESTED

1. By this motion (the “**Motion**”), the Reorganized Debtor seeks entry of an order further 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**”),² through November 14, 2025, solely as to proof of claim #2402 (the “**LMI Claim**”) filed by LMI Aerospace, Inc. (“**LMI**”). A proposed form of order (the “**Proposed Order**”) is attached to this Motion. LMI does not oppose the relief requested.

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. LMI filed the LMI Claim on December 14, 2023.

6. Under the Plan, the deadline for the Reorganized Debtor to object to claims (the “**Claims Objection Deadline**”) is “the later of (a) 270 days following the Effective Date, or (b) “such later date that is approved by order of the Bankruptcy Court for cause upon motion by the Reorganized Debtors.” Plan, Art. I.59. The filing of a motion to extend the Claims Objection

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

Deadline automatically tolls the Claims Objection Deadline while the motion is under consideration. *See Procedures for Complex Cases in the Southern District of Texas*, ¶ K.

7. Incora and LMI are continuing to work to resolve the issues presented in the LMI Claim, which relate to a frame contract governing the logistics, inspection, and tooling of purchased parts. Both sides believe that a consensual resolution can be achieved and that a further extension of the Claims Objection Deadline through November 14, 2025 would facilitate a cost-effective resolution without need for judicial intervention. Accordingly, LMI 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 LMI. 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: October 28, 2025

Respectfully submitted,

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr. (TX Bar No. 02016600)
Patrick L. Hughes (TX Bar No. 10227300)
Re’Necia Sherald (TX Bar No. 24121543)
HAYNES AND BOONE, LLP
1221 McKinney Street, Suite 4000
Houston, TX 77010
Telephone: 1 (713) 547-2000
Email: Charles.Beckham@HaynesBoone.com
Patrick.Hughes@HaynesBoone.com
ReNecia.Sherald@HaynesBoone.com

- and -

Dennis F. Dunne (admitted *pro hac vice*)
Samuel A. Khalil (admitted *pro hac vice*)
Benjamin M. Schak (admitted *pro hac vice*)
MILBANK LLP
55 Hudson Yards
New York, NY 10001
Telephone: 1 (212) 530-5000
Email: DDunne@Milbank.com
SKhalil@Milbank.com
BSchak@Milbank.com

- and -

Andrew M. Leblanc (admitted *pro hac vice*)
MILBANK LLP
1101 New York Avenue NW
Washington, DC 20005
Telephone: 1 (202) 835-7574
Email: ALeblanc@Milbank.com

Counsel to the Reorganized Debtor

CERTIFICATE OF SERVICE

I certify that, on October 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.

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**ORDER EXTENDING
THE CLAIMS OBJECTION DEADLINE AS TO
PROOF OF CLAIM #2402 OF LMI AEROSPACE, 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 motion (the “**Motion**”), of the above-captioned reorganized debtor (the “**Reorganized Debtor**”), for entry of an order (this “**Order**”) extending the Claims 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 November 14, 2025, as to proof of claim #2402 (the “**LMI Claim**”) filed by LMI Aerospace, Inc. (“**LMI**”); 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 Claims Objection Deadline (as defined in the Plan) is extended through November 14, 2025, solely as to the LMI Claim.
2. The Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: _____, 2025

Houston, Texas

THE HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE