

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.

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Case No. 23-90611

(Jointly Administered)

RESPONSE OPPOSED TO REORGANIZED DEBTORS' TENTH OMNIBUS
OBJECTION TO CLAIMS

[Relates to Dkt. No. 2963]

ExxonMobil Oil Corporation ("ExxonMobil") and ExxonMobil Mexico S.A. De C.V. ("ExxonMobil Mexico" together with ExxonMobil the "ExxonMobil Entities") creditors in the above-captioned cases, hereby file this *Response Opposed to Reorganized Debtors' Tenth Omnibus Objection to Claims* (this "Response"). In support hereof, the ExxonMobil Entities respectfully state as follows:

PROCEDURAL BACKGROUND

1. On June 1, 2023 (the "Petition Date"), the above-referenced Reorganized Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") commencing the above captioned jointly administered cases (the "Bankruptcy Cases" or "Cases") in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court").

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.



2. On October 10, 2023, ExxonMobil filed Claim No. 1434 in the amount of \$551,188.94 for unpaid invoices. On October 10, 2023, ExxonMobil Mexico timely filed Claim No. 1431 in the amount of \$277,884.95 for unpaid invoices.

3. On November 5, 2025, the Reorganized Debtors filed their *Tenth Omnibus Objection to Claims* [Dkt. No. 2963] (the “Objection”)

RESPONSE OPPOSED TO CLAIM OBJECTION

4. Counsel for the ExxonMobil Entities and counsel for Debtor have been in regular communication regarding the various Proofs of Claim. Counsel for the Exxon Mobile Entities are reviewing the issues raised in the Objection and will confer with Debtor's counsel to work toward a resolution of the Objection.

5. The ExxonMobil Entities reserve the right to amend or supplement this Response for any reason prior to any hearing on its claim. The ExxonMobil Entities further reserve their right to amend their claims for any reason.

PRAYER

WHEREFORE, for the reasons set forth herein, the ExxonMobil Entities respectfully requests that the Court deny the Tenth Omnibus Claim Objection and allow the claims of the ExxonMobil Entities as filed. The ExxonMobil Entities further request that the Court grant the ExxonMobil Entities any other or further relief to which the Court determines the ExxonMobil Entities are entitled.

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Dated: December 4, 2025

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

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COUNSEL FOR THE EXXONMOBIL ENTITIES

CERTIFICATE OF SERVICE

This is to certify that on December 4, 2025, a true and correct copy of the foregoing Response was filed with the Court and served via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in these cases.

/s/ Michael P. Ridulfo
Michael P. Ridulfo