

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
Dynamic Aerostructures LLC, <i>et al.</i> ,	Case No. 25-10292 (LSS)
Debtors. ¹	(Jointly Administered)
	Hearing Date: March 25, 2025 at 11:00 a.m. (ET)
	Objection Deadline: March 18, 2025 at 4:00 p.m. (ET)

NOTICE OF MOTIONS AND HEARING²

PLEASE TAKE NOTICE that on February 26, 2025, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the following pleadings (the “**First Day Motions**”):

1. Debtors’ Motion for Entry of Interim and Final Orders (I) (A) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (B) Approving the Debtors’ Proposed Procedures for Resolving Additional Assurance Requests, and (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services; And (II) Granting Related Relief [[Docket No. 6](#)].
2. Debtors’ Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations [[Docket No. 7](#)].
3. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors and Section 503(b)(9) Claimants, and (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests, and (III) Granting Related Relief [[Docket No. 8](#)].
4. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Honor Certain Prepetition Obligations to Customers and (B) Otherwise Continue Certain Customer Programs in the Ordinary Course of Business and (II) Granting Related Relief [[Docket No. 9](#)].
5. Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors To (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Dynamic Aerostructures LLC (3076); Dynamic Aerostructures Intermediate LLC (9800); and Forrest Machining LLC (3421). The Debtors’ service address is 27756 Avenue Mentry, Valencia, California 91355.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Motions.



Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; and (II) Granting Related Relief [[Docket No. 10](#)].

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors To (A) Pay Prepetition Wages, Employee Benefits Obligations and Other Compensation, and (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations and (II) Granting Related Relief [[Docket No. 11](#)].
7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Existing Business Forms, (II) Authorizing Debtors' Continued Use of Corporate Credit Card Program; And (III) Granting Related Relief [[Docket No. 12](#)].
8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Senior Secured Financing, (II) Authorizing the Debtors to Use Cash Collateral on a Limited Basis, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [[Docket No. 14](#)].

PLEASE TAKE FURTHER NOTICE that on February 27 and 28, 2025, the Court entered interim orders (the "**Interim Orders**") at Docket Nos. 53, 54, 55, 56, 57, 59, 61, and 65 granting the First Day Motions on an interim basis as set forth in such Interim Orders.

PLEASE TAKE FURTHER NOTICE that Objections, if any, to the final relief requested in the First Day Motions must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **March 18, 2025, at 4:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the objection (i) proposed co-counsel to the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036 (Attn: Gregg M. Galardi; email: gregg.galardi@ropesgray.com) and Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: Mark L. Desgrosseilliers and Robert A. Weber; email: desgross@chipmanbrown.com and weber@chipmanbrown.com), and Chipman Brown Cicero & Cole LLP, 501 5th Ave., 15th Floor, New York, NY 10017 (Attn: Daniel G. Egan; email: egan@chipmanbrown.com); (ii) counsel to the DIP Lender, King & Spalding LLP, 1100 Louisiana St., Suite 4100, Houston, TX 77002 (Attn: Michael Fishel; email: mfishel@kslaw.com) and Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Kenneth J. Enos; email: kenos@ycst.com); (iii) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, Delaware 19801 (Attn: Rosa Sierra-Fox; email: Rosa.Sierra-Fox@usdoj.gov); and (iv) counsel for any statutory committee appointed in these chapter 11 cases so as to be **received no later than 4:00 p.m. (Eastern Time) on March 18, 2025**.

PLEASE TAKE FURTHER NOTICE THAT A FINAL HEARING ON THE FIRST DAY MOTIONS WILL BE HELD ON **MARCH 25, 2025, AT 11:00 A.M. (EASTERN TIME)** BEFORE THE HONORABLE LAURIE S. SILVERSTEIN, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM 2, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE FINAL RELIEF REQUESTED IN THE FIRST DAY MOTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE FINAL RELIEF REQUESTED IN THE FIRST DAY MOTIONS WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 28, 2025
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

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Proposed Counsel to the Debtors and Debtors in Possession