

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

In re:

Dynamic Aerostructures LLC, *et al.*,
Debtors.¹

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. 73

**CERTIFICATION OF COUNSEL REGARDING APPLICATION OF THE DEBTORS
FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF CHIPMAN BROWN CICERO & COLE, LLP, AS CO-COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

The undersigned counsel for the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On March 4, 2025, the Debtors filed the *Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP, as Co-Counsel to the Debtors Effective as of the Petition Date* [Docket No. 73] (the “**Application**”).

2. Pursuant to the notice of Application, the deadline to file objections regarding the relief requested in the Application was set for March 18, 2025, at 4:00 p.m. (Eastern Time).

3. Prior to the Objection Deadline, the Debtors received comments from the United States Trustee (the “**U.S. Trustee**”).

4. On March 19, 2025, the Debtors filed the *Supplemental Declaration of Mark L. Desgrosseilliers in Support of the Application of the Debtors for Entry of an Order Authorizing*

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.



the Retention and Employment of Chipman Brown Cicero & Cole, LLP, as Co-Counsel to the Debtors Effective as of the Petition Date [Docket No. 112].

5. The Debtors hereby submit a revised form of order (the “**Revised Order**”), attached hereto as **Exhibit A**, which reflects changes in response to the comments received. The Revised Order has been reviewed by counsel to the U.S. Trustee and is acceptable to the U.S. Trustee.

6. Attached as **Exhibit B** is a blackline of the Revised Order against the order filed with the Motion.

WHEREFORE, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: March 19, 2025

CHIPMAN BROWN CICERO & COLE, LLP

/s/ Mark L. Desgrosseilliers

Robert A. Weber (I.D. No. 4013)

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

Telephone: (302) 295-0192

weber@chipmanbrown.com

desgross@chipmanbrown.com

-and-

CHIPMAN BROWN CICERO & COLE, LLP

Daniel G. Egan (admitted *pro hac vice*)

501 5th Ave. 15th Floor

New York, New York 10017

Telephone: (646) 741-5529

egan@chipmanbrown.com

-and-

ROPES & GRAY LLP

Gregg M. Galardi (No. 2991)
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
gregg.galardi@ropesgray.com

*Proposed Counsel to the Debtors and Debtors in
Possession*

EXHIBIT A

Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re: Dynamic Aerostructures LLC, <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 25-10292 (LSS) (Jointly Administered) Related Docket No. 73
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**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT
OF CHIPMAN BROWN CICERO & COLE, LLP, AS CO-COUNSEL
TO THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

Upon the application (the “**Application**”)² filed by the Debtors for entry of an order, pursuant to sections 327(a), 328(a) and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b), and 5002 and Local Rule 2014-1, authorizing the retention and employment of CBCC as co-counsel to the Debtors effective as of the Petition Date; the Court, having reviewed the Application and the Declaration, finds that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, that this is a core matter pursuant to 28 U.S.C. § 157(b)(2), that notice of the Application was sufficient under the circumstances, that no further notice need be given, and that the legal and factual bases set forth in the Application established just cause for the relief granted herein;

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. Pursuant to sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b) and 5002, and Local Rule 2014-1, the Debtors are authorized to retain and employ CBCC effective as of the Petition Date.
3. CBCC shall be compensated in accordance with the procedures set forth in the Application, sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court.
4. CBCC shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013*, in connection with any interim or final fee applications that CBCC files in the Chapter 11 Cases.
5. Notwithstanding anything in the Application to the contrary, CBCC shall not be entitled to recover any attorneys' fees or expenses for defending its fee applications in the Chapter 11 Cases.
6. CBCC shall make reasonable efforts to avoid the duplication of services provided by any of the Debtors' other retained Professionals in these Chapter 11 Cases.
7. The terms of this Order shall be immediately effective and enforceable upon its entry.
8. CBCC shall be permitted to hold the Security Retainer and apply such Security Retainer against any unpaid approved fees and expenses of CBCC following a final hearing with

respect to such fees and expenses, and promptly pay to the Debtors' estates any retainer remaining after such application.

9. CBCC shall provide ten (10) business days' notice to the Debtors and the U.S. Trustee in connection with any increase of the hourly rates listed in the Application. The U.S. Trustee and the Debtors retain all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

10. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation or implementation of this Order.

EXHIBIT B

Redline Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

Dynamic Aerostructures LLC, *et al.*,
Debtors.¹

Chapter 11

Case No. 25-10292 (LSS)

(Jointly Administered)

Related Docket No. ~~—~~[73](#)

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IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.
2. Pursuant to sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b) and 5002, and Local Rule 2014-1, the Debtors are authorized to retain and employ CBCC ~~as co-counsel with R&G~~ effective as of the Petition Date.
3. CBCC shall be compensated in accordance with the procedures set forth in the Application, sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and orders of this Court.
4. CBCC shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013*, in connection with any interim or final fee applications that CBCC files in the Chapter 11 Cases.
5. Notwithstanding anything in the Application to the contrary, CBCC shall not be entitled to recover any attorneys' fees or expenses for defending its fee applications in the Chapter 11 Cases.
6. CBCC shall make reasonable efforts to avoid the duplication of services provided by any of the Debtors' other retained Professionals in these Chapter 11 Cases.
7. The terms of this Order shall be immediately effective and enforceable upon its entry.
8. CBCC shall be permitted to hold the Security Retainer and apply such Security Retainer against any unpaid approved fees and expenses of CBCC following a final hearing with

respect to such fees and expenses, and promptly pay to the Debtors' estates any retainer remaining after such application.

9. CBCC shall provide ten (10) business days' notice to the Debtors and the U.S. Trustee in connection with any increase of the hourly rates listed in the Application. The U.S. Trustee and the Debtors retain all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

10. The Court shall retain jurisdiction to hear and determine all matters arising from or relating to the interpretation or implementation of this Order.

Document comparison by Workshare Compare on Wednesday, March 19, 2025
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Input:	
Document 1 ID	netdocuments://4918-8792-2983/1
Description	Dynamic - CBCC Retention Order
Document 2 ID	netdocuments://4918-8792-2983/2
Description	Dynamic - CBCC Retention Order
Rendering set	Standard

Legend:	
<u>Insertion</u>	
Deletion	
Moved from	
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Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
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Deletions	3
Moved from	0
Moved to	0
Style changes	0
Format changes	0
Total changes	5