

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

Dynamic Aerostructures LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 25-10292 (LSS)

*(Jointly Administered)*

**NOTICE OF AGENDA FOR THE HEARING ON  
SCHEDULED FOR MARCH 25, 2025, AT 11:00 A.M. (ET)**<sup>2</sup>

**This hearing will be conducted in-person, any exceptions must be approved by chambers.**

**Parties may observe the hearing remotely by registering with the Zoom link below no later than March 24, 2025, at 4:00 p.m.**

**To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov).**

**\*The deadline to register for remote attendance is 4 PM (prevailing Eastern Time) the business day before the hearing unless otherwise noticed.\***

**After the deadline has passed an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.**

**I. ADJOURNED MATTERS**

1. Debtors' Motion to File under Seal, filed March 4, 2025 [[Docket No. 83](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET), extended to March 21, 2025, at 10:00 a.m. (ET) for the U.S. Trustee.

<sup>1</sup> 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.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following web address: [www.veritaglobal.net/FMIAerostructures](http://www.veritaglobal.net/FMIAerostructures).



Related Pleadings:

- a) [SEALED] Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation, filed March 4, 2025 [Docket No.82].

Responses Received: Informal comments from the U.S. Trustee.

Status: This matter has been adjourned to the hearing on April 7, 2025, at 2:00 p.m. (ET) to allow the Debtors and the U.S. Trustee to attempt to resolve their issues with respect to this matter.

**II. RESOLVED MATTERS**

- 2. 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, filed February 26, 2025 [[Docket No. 6](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order (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, entered February 27, 2025 [[Docket No. 53](#)].
- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Certification of Counsel Regarding 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, filed March 19, 2025 [[Docket No. 124](#)].
- e) Final Order (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, entered March 20, 2025 [[Docket No. 136](#)].

Responses Received:

- a) Objection of Southern California Edison Company to the 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, filed March 7, 2025 [[Docket No. 89](#)].
- b) Notice of Withdrawal of Objection of Southern California Edison Company to the 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, filed March 13, 2025 [[Docket No. 101](#)].

Status: An order has been entered. No hearing is necessary.

3. Debtors' Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations, filed February 26, 2025 [[Docket No. 7](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations, entered February 27, 2025 [[Docket No. 54](#)].
- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Certificate of No Objection Regarding Debtors' Motion for Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes and Related Obligations, filed March 19, 2025 [[Docket No. 114](#)].

- e) Final Order Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations, entered March 20, 2025 [[Docket No. 127](#)].

Responses Received: None.

Status: An order has been entered. No hearing is necessary.

- 4. 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, filed February 26, 2025 [[Docket No. 8](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order (I) Authorizing Debtors to (A) Pay Certain Prepetition Claims of Critical Vendors and Section 503(b)(9) Claimants, and (B) Follow Certain Procedures Related Thereto; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests; and (III) Granting Related Relief, entered February 27, 2025 [[Docket No. 61](#)].
- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Notice of Filing of Revised Proposed Form of Final Order (I) Authorizing Debtors to (A) Pay Certain Prepetition Claims of Critical Vendors and Section 503(b)(9) Claimants, and (B) Follow Certain Procedures Related Thereto; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests; and (III) Granting Related Relief, filed March 4, 2025 [[Docket No. 80](#)].
- e) Certification of Counsel Regarding Final Order (I) Authorizing Debtors to (A) Pay Certain Prepetition Claims of Critical Vendors and Section 503(b)(9) Claimants, and (B) Follow Certain Procedures Related Thereto; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests; and (III) Granting Related Relief, filed March 19, 2025 [[Docket No. 123](#)].
- f) Final Order (I) Authorizing Debtors to (A) Pay Certain Prepetition Claims of Critical Vendors and Section 503(b)(9) Claimants, and (B) Follow Certain Procedures Related Thereto; (II) Authorizing Banks to Honor and

Process Check and Electronic Transfer Requests; and (III) Granting Related Relief, entered March 20, 2025 [[Docket No. 135](#)].

Responses Received: None.

Status: An order has been entered. No hearing is necessary.

5. 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, filed February 26, 2025 [[Docket No. 9](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order (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, entered February 27, 2025 [[Docket No. 55](#)].
- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Certificate of No Objection Regarding 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, filed March 19, 2025 [[Docket No. 115](#)].
- e) Final Order (I) (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, entered March 20, 2025 [[Docket No. 128](#)].

Responses Received: None.

Status: An order has been entered. No hearing is necessary.

6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors To (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; and (II) Granting Related Relief, filed February 26, 2025 [[Docket No. 10](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; and (II) Granting Related Relief, entered February 27, 2025 [[Docket No. 56](#)].
- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Certificate of No Objection Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors To (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; and (II) Granting Related Relief, filed March 19, 2025 [[Docket No. 116](#)].
- e) Final Order (I) Authorizing Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, and (B) Renew, Supplement, Modify, or Purchase Insurance Coverage; and (II) Granting Related Relief, entered March 20, 2025 [[Docket No. 129](#)].

Responses Received: None.

Status: An order has been entered. No hearing is necessary.

7. 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, filed February 26, 2025 [[Docket No. 11](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Employee Benefits Obligations, and Other Compensation, (B) Continue Employee Benefits Programs and Pay Related Administrative Obligations

and (II) Granting Related Relief, entered February 27, 2025 [[Docket No. 57](#)].

- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Certificate of No Objection Regarding 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, filed March 19, 2025 [[Docket No. 117](#)].
- e) Final Order (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, entered March 20, 2025 [[Docket No. 130](#)].

Responses Received: None.

Status: An order has been entered. No hearing is necessary.

- 8. 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, filed February 26, 2025 [[Docket No. 12](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Interim Order (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, entered February 27, 2025 [[Docket No. 59](#)].
- c) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- d) Certificate of No Objection Regarding 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, filed March 19, 2025 [[Docket No. 118](#)].

- e) Final Order (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, entered March 20, 2025 [[Docket No. 131](#)].

Responses Received: None.

Status: An order has been entered. No hearing is necessary.

- 9. Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Configure Partners, LLC and Configure Partners Securities, LLC as Investment Banker for the Debtors and Debtors in Possession, Pursuant to 11 U.S.C. §§ 327(a) and 328, Effective as of the Petition Date, (B) Waiving Certain Information Requirements Imposed by Local Rule 2016-1, and (C) Granting Related Relief, filed March 4, 2025 [[Docket No. 75](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Certification of Counsel Regarding Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Configure Partners, LLC and Configure Partners Securities, LLC as Investment Banker for the Debtors and Debtors in Possession, Pursuant to 11 U.S.C. §§ 327(a) and 328, Effective as of the Petition Date, (B) Waiving Certain Information Requirements Imposed by Local Rule 2016-1, and (C) Granting Related Relief, filed March 20, 2025 [[Docket No. 126](#)].
- b) Order (I) Authorizing the Retention and Employment of Configure Partners, LLC and Configure Partners Securities, LLC as Investment Banker for the Debtors and Debtors in Possession, Pursuant to 11 U.S.C. §§ 327(a) and 328, Effective as of the Petition Date, (II) Waiving Certain Information Requirements Imposed by Local Rule 2016-1, and (III) Granting Related Relief, entered March 21, 2025 [[Docket No. 143](#)].

Responses Received: Informal comments from the U.S. Trustee.

Status: An order has been entered. No hearing is necessary.



10. Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date, filed March 4, 2025 [[Docket No. 76](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Certification of Counsel Regarding Debtors' Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date, filed March 19, 2025 [[Docket No. 120](#)].
- b) Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor Effective as of the Petition Date, entered March 20, 2025 [[Docket No. 134](#)].

Responses Received: Informal comments from the U.S. Trustee.

Status: An order has been entered. No hearing is necessary.

11. Motion of Debtors for Entry of Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business, filed March 4, 2025 [[Docket No. 77](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Certification of Counsel Regarding Motion of Debtors for Entry of Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business, filed March 19, 2025 [[Docket No. 121](#)].
- b) Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business, entered March 20, 2025 [[Docket No. 133](#)].

Responses Received: Informal comments from the U.S. Trustee.

Status: An order has been entered. No hearing is necessary.

12. Motion of the Debtors for Entry of An Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, filed March 4, 2025 [[Docket No. 78](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Certification of Counsel Regarding Motion of the Debtors for Entry of An Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, filed March 19, 2025 [[Docket No. 119](#)].
- b) Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, entered March 20, 2025 [[Docket No. 132](#)].

Responses Received: Informal comments from the U.S. Trustee.

Status: An order has been entered. No hearing is necessary.

**III. MATTERS UNDER CERTIFICATION**

- 13. 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, filed February 26, 2025 [[Docket No. 14](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) Declaration of Matthew Guill in Support of Debtors' Motion to Obtain Postpetition Debtor in Possession Financing, filed February 26, 2025 [[Docket No. 15](#)].
- c) Interim Order (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, entered February 28, 2025 [[Docket No. 65](#)].
- d) Notice of Motions and Hearing, filed February 28, 2025 [[Docket No. 66](#)].
- e) Notice of Filing of Form of Final Order (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 and (VI) Granting Related Relief, filed March 19, 2025 [[Docket No. 113](#)].

- f) Certification of Counsel Regarding Final Order (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 and (VI) Granting Related Relief, filed March 21, 2025 [[Docket No. 145](#)].

Responses Received:

- a) Limited Objection of Mitsubishi HC Capital America, Inc. to the 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, filed March 18, 2025 [[Docket No. 109](#)].
- b) Informal comments from Lockheed Martin Corporation.

Status: A revised form of order has been filed under certification of counsel. No hearing is necessary.

14. 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, filed March 4, 2025 [[Docket No. 73](#)].  
Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Supplemental Declaration of Mark L. Desgrosseilliers in Support of 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, filed March 19, 2025 [[Docket No. 112](#)].
- b) 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, filed March 19, 2025 [[Docket No. 122](#)].

Responses Received: Informal comments from the U.S. Trustee.

Status: A revised form of order has been filed under certification of counsel. No hearing is necessary.

15. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Berkeley Research Group, LLC, as Financial Advisor for the Debtors, Effective as of the Petition Date, filed March 4, 2025 [[Docket No. 74](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Supplemental Declaration of Bob Butler in Support of Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Berkeley Research Group, LLC, as Financial Advisor for the Debtors, Effective as of the Petition Date, filed March 21, 2025 [[Docket No. 141](#)]
- b) Certification of Counsel Regarding Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Berkeley Research Group, LLC as Financial Advisor for the Debtors, Effective as of the Petition Date, filed March 21, 2025 [[Docket No. 142](#)]

Responses Received: Informal comments from the U.S. Trustee.

Status: A revised form of order has been filed under certification of counsel. No hearing is necessary.

16. [SEALED] Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation, filed March 4, 2025 [[Docket No. 82](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET), extended to March 21, 2025, at 10:00 a.m. (ET) for the U.S. Trustee.

Related Pleadings:

- a) Declaration of Eric N. Ellis in Support of the Debtors' Chapter 11 Petitions and First Day Motions, filed February 26, 2025 [[Docket No. 2](#)].
- b) [REDACTED] Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation, filed March 4, 2025 [[Docket No. 81](#)].
- c) Declaration of Eric N. Ellis in Support of Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation, filed March 20, 2025 [[Docket No. 137](#)].

- d) Certification of Counsel Regarding Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation, filed March 20, 2025 [[Docket No. 140](#)]

Responses Received: Informal comments from the U.S. Trustee.

Status: A revised form of order has been filed under certification of counsel. No hearing is necessary.

- 17. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors Effective as of the Petition Date, filed March 4, 2025 [[Docket No. 84](#)].

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Related Pleadings:

- a) Supplemental Declaration of Gregg M. Galardi in Support of the Debtors Application for Entry of an Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors Effective as of the Petition Date, filed March 21, 2025 [[Docket No. 144](#)].
- b) Certification of Counsel Regarding Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Ropes & Gray LLP as Attorneys for the Debtors Effective as of the Petition Date, filed March 21, 2025 [[Docket No. 146](#)].

Responses Received: Informal comments from the U.S. Trustee.

Status: A revised form of order has been filed under certification of counsel. No hearing is necessary.

#### **IV. MATTERS GOING FORWARD**

- 18. Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of

Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed February 26, 2025 [[Docket No. 16](#)].

Objection Deadline: March 18, 2025 at 4:00 p.m. (ET).

Related Pleadings:

- a) Declaration of Rory Keenan in Support of Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed February 26, 2025 [[Docket No. 17](#)].
- b) Notice of Hearing Regarding Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed February 28, 2025 [[Docket No. 63](#)].
- c) Notice of (A) Filing of Revised Proposed Order (I) Approving Bidding Procedures for the Sale Of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related

Relief And (B) Hearing with Respect Thereto, filed March 3, 2025 [[Docket No. 69](#)].

- d) Notice of Filing of Proposed Order (I) Approving and Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief, filed March 14, 2025 [[Docket No. 106](#)].
- e) Notice of (A) Filing of Further Revised Proposed Order (I) Approving Bidding Procedures for the Sale Of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors' Entry into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief, filed March 20, 2025 [[Docket No. 125](#)].

Responses Received:

- a) Limited Objection of Mitsubishi Capital America, Inc. to the Debtors' Motion Pursuant To Sections 105, 363, and 365 of the Bankruptcy Code for Entry of Orders (A)(I) Approving Bidding Procedures for the Sale of Debtors' Assets, (II) Scheduling Hearings and Objection Deadlines with Respect to the Sale, (III) Scheduling Bid Deadlines and an Auction, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures for Executory Contracts and Unexpired Leases, (VI) Authorizing and Approving the Debtors Entry Into the Stalking Horse APA, (VII) Authorizing and Approving Bid Protections, and (VIII) Granting Related Relief and (B)(I) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (III) Granting Related Relief, filed March 18, 2025 [[Docket No. 110](#)].

Status: This matter is going forward.

- 19. Debtors' Motion for Entry of an Order (I) Setting Cure Amounts for Certain Contracts and Leases and (II) Granting Related Relief, filed February 26, 2025 [[Docket No. 35](#)].

Objection Deadline: March 17, 2025 at 4:00 p.m. (ET).

Related Pleadings:

- a) Notice of Hearing Regarding Debtors' Motion for Entry of an Order (I) Setting Cure Amounts for Certain Contracts and Leases and (II) Granting Related Relief, filed February 28, 2025 [[Docket No. 62](#)].

Responses Received:

- a) Objection by Rexford Industrial - 27712 Avenue Mentry, LLC to Notice Of Proposed Cure Amounts and Reservation of Rights, filed March 10, 2025 [[Docket No. 95](#)].

Status: The Debtors are working with Rexford Industrial – 27712 Avenue Mentry, LLC in an effort to resolve issues with respect to the proposed order. To the extent not resolved, this matter is going forward.



Dated: March 21, 2025

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