

**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)

**Re: D.I. 169**

**NOTICE OF STALKING HORSE PURCHASER'S INTENTION TO CREDIT BID**

**PLEASE TAKE NOTICE** that, pursuant to paragraph 20 of the *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* [D.I. 169] (the "Bidding Procedures Order"),<sup>2</sup> FMI Holdco LLC, as Stalking Horse Purchaser, intends to credit bid all or a portion of the secured claims under the Prepetition Credit Agreement (as defined in the *Notice of Transfer of Claims of BMO Harris Bank N.A. to FMI Holdco LLC* [D.I. 102]) at any Auction in connection with the Sale.

**PLEASE TAKE FURTHER NOTICE** that the filing of this Notice shall not be deemed, or construed to constitute, a waiver of any substantive or procedural rights of FMI Holdco LLC or its affiliates, and all rights are expressly reserved.

<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> Capitalized terms used but not defined herein shall have the meaning given to such terms in the Bidding Procedures Order.



251029225032600000000004

Dated: March 26, 2025  
Wilmington Delaware

**TROUTMAN PEPPER LOCKE LLP**

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**CERTIFICATE OF SERVICE**

I, Tori L. Remington, hereby certify that on the 26th day of March 2025, I caused the foregoing to be served by upon the parties set forth below, in the manner indicated; and all ECF participants registered in this case were served electronically on the date of filing through the court's ECF system at their respective email addresses registered with the court.

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*/s/ Tori L. Remington*

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