

**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)

**AFFIDAVIT OF PUBLICATION OF THE NOTICE OF PROPOSED SALE OF ASSETS,
STALKING HORSE APA, BIDDING PROCEDURES, AUCTION, AND SALE
HEARING IN THE NEW YORK TIMES**

This Affidavit of Publication includes the sworn statement verifying that the *Notice of Proposed Sale of Assets, Stalking Horse APA, Bidding Procedures, Auction, and Sale Hearing* was published and incorporated by reference herein as follows:

1. In *The New York Times* on March 28th, 2025, attached hereto as **Exhibit A**.

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.



251029225040200000000005

Exhibit A



The New York Times Company

620 8th Avenue
New York, NY 10018
nytimes.com

PROOF OF PUBLICATION

March 28, 2025

I, Larnyce Tabron, in my capacity as a Principal Clerk of the Publisher of The New York Times, a daily newspaper of general circulation printed and published in the City, County, and State of New York, hereby certify that the advertisement annexed hereto was published in the editions of The New York Times on the following date or dates, to wit on.

3/28/2025, NY/NATL, pg B4

Larnyce Tabron

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Chapter 11
Dynamic Aerostructures LLC, et al., (Debtors),
Case No. 25-10292 (LSS) (Jointly Administered)

NOTICE OF PROPOSED SALE OF ASSETS, STALKING HORSE APA, BIDDING PROCEDURES, AUCTION, AND SALE HEARING

PLEASE TAKE NOTICE that on February 26, 2025, the above-captioned debtors and debtors in possession each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), in the United States Bankruptcy Court for the District of Delaware (the "Court"). The Debtors are seeking to sell (the "Sale") and substantially all of their assets (the "Assets") free and clear of all Liens other than Assumed Liabilities (each as defined in the Stalking Horse APA, as defined below). In connection with the Sale, the Debtors have entered into an asset purchase agreement dated as of February 25, 2025 (the "Stalking Horse APA") with FMI Holdco LLC, subject to the Debtors' acceptance of higher or otherwise better offers in accordance with the Bidding Procedures (as defined below).

Summary of Key Dates Established by Bidding Procedures

Event/Deadline	Date
Bidding Procedures Hearing	March 25, 2025
Bid Deadline	April 2, 2025 at 4:00 p.m. (ET)
Deadline to object to approval of Sale to Stalking Horse Purchaser	April 3, 2025 at 4:00 p.m. (ET)
Auction (if Necessary)	April 4, 2025 at 10:00 a.m. (ET)
Adequate Assurance Objection Deadline (to Stalking Horse Bidder)	April 4, 2025 at 12:00 p.m. (ET)
Final Notice of Successful Bidder	April 5, 2025
Post-Auction Objection Deadline and Adequate Assurance Objection Deadline (if Successful Bidder is not the Stalking Horse Purchaser)	April 7, 2025 (at the time of the Sale Hearing)
Sale Hearing	April 7, 2025 at 2:00 p.m. (ET)

[webster@chipmanbrown.com]; and Daniel G. Egan (egan@chipmanbrown.com).

PLEASE TAKE FURTHER NOTICE that unless adjourned in accordance with the Bidding Procedures Order, the Bankruptcy Court will conduct a hearing (the "Sale Hearing") to consider the Sale on **April 7, 2025 at 2:00 p.m. (E.T.)**, subject to the Bankruptcy Court's availability.

PLEASE TAKE FURTHER NOTICE that any objections approval of the Sale to the Stalking Horse Purchaser (each, a "Sale Objection") must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules; (c) set forth the specific basis for the Sale Objection; (d) be filed with the Clerk of this Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801 (the "Clerk"), and proof of service of such Sale Objection upon the Objection Notice Parties (as defined below) shall be filed with the Court as and when required by the Local Rules; and (e) be served upon the Objection Notice Parties. Sale Objections must be filed with the Clerk **on or before April 3, 2025 at 4:00 p.m. (E.T.)** (the "Sale Objection Deadline").

PLEASE TAKE FURTHER NOTICE that any objections approval of the Sale to a Successful Bidder other than the Stalking Horse Purchaser (each, a "Post-Auction Objection") must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules; (c) set forth the specific basis for the Post-Auction Objection; (d) be filed with the Clerk of this Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801 (the "Clerk"), and proof of service of such Post-Auction Objection upon the Objection Notice Parties (as defined below) shall be filed with the Court as and when required by the Local Rules; and (e) be served upon the Objection Notice Parties. Post-Auction Objections must be filed with the Clerk **on or before April 7, 2025 at the time of the Sale Hearing** (the "Post-Auction Objection Deadline").

The "Objection Notice Parties" are as follows: (i) counsel for the Debtors, Rogers & Gray LLP, 1217 Avenue of the Americas, New York, NY 10036 (Attn: Gregg M. Galardi, email: gregg.galardi@rogersgray.com), and Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: Mark L. Dregosvillers and Robert A. Weber; email: dregosvillers@chipmanbrown.com and webster@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 for the Stalking Horse Purchaser, Troutman Pepper Locke LLP, 300 S. Grand Ave., 26th Floor, Los Angeles, CA 90071 (Attn: David Kapetz; email: david.kapetz@troutman.com); (iii) counsel for any statutory committee of unsecured creditors appointed in these chapter 11 cases; (iv) counsel to the DIP Lender, King & Spalding LLP, 1100 Louisiana St., Suite 4100, Houston, TX 77002 (Attn: Michael Fisher; email: mfisher@kslsp.com) and Irving Conway Stanger & Taylor LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Kenneth J. Enas; email: kenass@ycst.com); and (v) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, DE 19801 (Attn: Risa Sierra-Fee; email: Risa_Sierra-Fee@usts.gov).

PLEASE TAKE FURTHER NOTICE THAT FAILURE TO ABIDE BY THE BIDDING PROCEDURES, THE BIDDING PROCEDURES ORDER OR ANY OTHER APPLICABLE ORDER OF THE COURT ENTERED IN THESE CHAPTER 11 CASES MAY RESULT IN THE REJECTION OF YOUR BID AND YOUR DISQUALIFICATION FROM PARTICIPATING IN THE BIDDING FOR AND AUCTION OF ANY OF THE DEBTORS' ASSETS.

PLEASE TAKE FURTHER NOTICE THAT IF A SALE OBJECTION OR POST-AUCTION OBJECTION IS NOT FILED AND SERVED ON OR BEFORE THE APPLICABLE SALE OBJECTION DEADLINE OR POST-AUCTION OBJECTION DEADLINE IN ACCORDANCE WITH THE BIDDING PROCEDURES ORDER, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE SALE AND BEING HEARD AT THE SALE HEARING, AND THE BANKRUPTCY COURT MAY ENTER THE SALE ORDER WITHOUT FURTHER NOTICE TO SUCH PARTY.

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 (0076); Dynamic Aerostructures Intermediate LLC (9800); and Forest Machining LLC (3421). The Debtors' service address is 27756 Avenue Menry, Valencia, California 91355.

Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Bidding Procedures Order and Bidding Procedures (each as defined below).

Sworn to me this 28th day of March, 2025

Shannon Schmidt
Online Notary Public
State of New York
Nassau County
Commission #: 01SC0033223
Commission Expires: 01/28/2029

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‘After Midnight’ to End, In Latest Blow to Genre

By JOHN KOBLIN

It's another blow to late-night television.

CBS said on Wednesday that it was canceling “After Midnight,” the network’s 12:30 a.m. comedy show, after the host, Taylor Tomlinson, decided to return full time to stand-up comedy.

The late-night comedy genre confronts significant financial challenges as the entertainment world transitions away from traditional television to streaming. The number of late-night shows is dwindling, and many of the survivors are facing pressure to cut their budgets. Audiences and advertising revenue for late-night TV are getting smaller by the year.

Further, the genre, which depends on a large number of episodes and topical humor, has not worked in streaming. Outlets like Netflix and Hulu have introduced original talk shows with a late-night-like format only to cancel nearly every one.

Without “After Midnight,” the 2025-26 season will be the first in three decades that CBS will not have original programming in the 12:30 slot.

CBS executives had renewed the show last week for a third sea-

son, which runs from September to May, but canceled it after Ms. Tomlinson’s surprise decision. Its finale will be in June.

Ms. Tomlinson, 31, said in a statement that she wanted to tour as a stand-up — her “first passion” — full time.

Stephen Colbert, the host of CBS’s “The Late Show” and an executive producer of Ms. Tomlinson’s show, which follows his, said in a statement: “While we were excited and grateful for our third season to start in the fall, we respect Taylor’s decision to return to stand-up full time.”

“After Midnight,” which debuted in January 2024, was an experiment. After James Corden stepped aside from “The Late Late Show” in 2023, CBS decided to scrap the traditional late-night format featuring a host, a monologue and a band and try a comedied game show, with a smaller budget and staff.

The move to cancel “After Midnight” — and to remove original programming altogether at 12:30 for the coming TV season — increases the likelihood that CBS will not look for another late-night format in the future.

In recent years, late-night hosts



Taylor Tomlinson has hosted “After Midnight” on CBS since January 2024. The final episode will air in June.

no longer seem interested in having lifetime appointments to the position. Trevor Noah voluntarily left “The Daily Show” in 2022 and then Mr. Corden left “The Late Late Show,” with both hosts saying they wanted to pursue other career opportunities.

Conan O’Brien, the former NBC and TBS late-night host, has found a career renaissance via podcasts, which helped earn him hosting duties for the Academy Awards this month.

CBS has been running original late-night programming since

1993, when David Letterman moved from NBC. “The Late Late Show” debuted at 12:30 a.m. in 1995. Before that, the network had been showing repeats of “bad dramas” in late-night hours, as the network’s former chief executive once put it.

Sundance Has Picked New Home In Colorado

By NICOLE SPERLING

The Sundance Film Festival is venturing to a new ski town.

After a year of deliberations, copious site visits and scores of plane rides, the board of the Sundance Institute has chosen Boulder, Colo., to host its film festival beginning January 2027.

“Boulder is a tech town, a college town, it’s a really creative town,” Eugene Hernandez, the festival’s director, said. “It’s just a really creative place. And that integration of the artsy community with the university side of it all is really dynamic.”

It’s also 10 times the size of Park City, Utah, where the festival has been held since the actor and director Robert Redford started it in 1981. As the festival kept growing, Park City began bursting at the seams.

Ebs Burnough, chair of the Sundance Institute, said the move to another mountain town would help Sundance maintain its connection to the natural world. “It’s easy to get drawn into that amazing thing that Robert Redford really believed in, which was that commune between the artist and nature, and to actually be able to get away from the verticalness of cities.”

To frequent Sundance goes, the move to Boulder is likely to be less jarring than shifting the location to Cincinnati, one of two other finalist cities. Salt Lake City was also in the running, and the loss of the festival will be significant to the state of Utah. The festival generated \$132 million in revenue for the state in 2024, according to a report released by the festival.

Sundance announced last April that it was exploring the possibility of a new home. Park City just didn’t have enough movie theaters, and lodging prices had become exorbitant. A good portion of the locals were ready for it to go, too. While Sundance added 1,730 jobs, according to the festival, it also kept skiers away during a prime month of winter snow.

“Words cannot express the sincere gratitude I have for Park City, the state of Utah and all those in the Utah community that have helped to build the organization,” Mr. Redford said in a statement.

Boulder, about 30 miles outside

After 40 years in Park City, Utah, festival will head to Boulder.

Denver, has around 100,000 residents, compared with Park City’s 8,200. The festival intends to center its activities in the city’s downtown and its nearby theaters and venues and the Pearl Street Mall, a pedestrian street with restaurants and cafes. The festival will also collaborate with the University of Colorado Boulder.

Initially, over 100 U.S. locations offered to host the festival. Sundance winnowed them down to the 67 that could meet a variety of requirements, including adequate screening and lodging locations and proximity to a sizable international airport. The Sundance selection committee then invited 13 of those cities to submit a proposal. Six of them — Atlanta; Boulder; Cincinnati; Louisville, Ky.; Salt Lake City; and Santa Fe, N.M. — were later selected for site visits.

Sundance will not be the only significant film festival held in Colorado. The Telluride Film Festival has been operating over Labor Day weekend in Telluride, a mountain town in the southwest part of the state, for over 50 years.

Facebook Returns to Roots With Its New Friends Tab

By MIKE ISAAC

Last year, Mark Zuckerberg, Meta’s chief executive, and Tom Alison, one of his top lieutenants, were discussing how they wanted to reshape Facebook for the future of social networking.

Mr. Zuckerberg, who had grown Facebook from a dorm room project to a \$1.5 trillion company that he renamed Meta, wanted to bring back some of the original rationale for the social network, or

Bringing back the original rationale for the social network.

what he called “OG Facebook” vibes. Mr. Alison said in an interview. After years of adding features, the executives felt that some of Facebook’s key functions were being drowned out.

So they asked themselves: Why not try building some features that resembled the Facebook of yore a bit more?

On Thursday, Meta did just that with a simple tweak. The company said the Facebook app would now include a separate news feed for users that featured posts shared exclusively by people’s friends and family.

The feature, called the Friends Tab, will replace a tab in the app that showed new friend requests or suggested friends. Friends Tab will instead show a scrolling feed

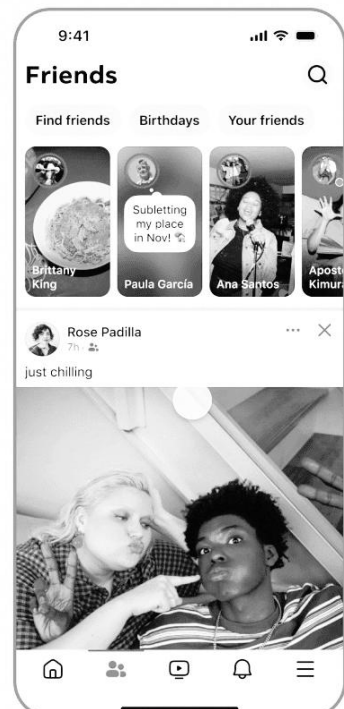
of posts, such as photos, video stories, text, birthday notifications and friend requests. For now, it will be available to Facebook users only in the United States and Canada.

“This idea of having a central place of what’s going on with your friends, that was like the magic of the early days of social media,” said Mr. Alison, who is head of the Facebook app. “We’re making sure that there’s still a place for this stuff on Facebook. It is something that shouldn’t get lost in the modern social media mix.”

The new feed is a sharp departure from the way social media has evolved over the past decade. The rise of apps like TikTok habituated users to seeing posts in their feeds from influencers and content creators, who were often people they had never met. Other companies followed suit. Meta’s apps, which also include Instagram, began leaning more heavily on recommended content to keep people engaged for longer periods.

Now people view apps like YouTube, Instagram and TikTok as something more akin to television — a lean-back experience fueled by a smaller number of creators who produce hours of entertainment for the rest of the internet to consume.

Not everyone has welcomed the shift. When Mr. Zuckerberg founded Facebook in 2004, it was aimed at helping college students connect with their friends on cam-



On Thursday, Meta said it would have a Friends Tab for Facebook that will show users a feed with posts from friends and family.

pus. As the app grew more popular, it became about helping every user keep up to date with posts from friends and family.

So when Mr. Zuckerberg announced in 2022 that Meta would insert recommended content on Facebook from people who were not connected to the user, many users revolted. Many initially found the recommended content — which relied on artificial intelligence to surface suggestions — jarring. After some criticism, Mr. Zuckerberg slightly scaled back the amount of such content added into people’s Facebook feeds.

Still, that did not stop Meta from embracing algorithmically recommended content. In recent years, more of people’s feeds on Facebook and Instagram became dominated by creators, businesses and brands. Recommended content like Reels, Meta’s video product, led people to spend more time on the apps, the company has said.

Meta has no plans to stop adding recommended content to users’ feeds. Mr. Alison said in the interview. For now, the company does not expect the Friends Tab to be more popular than the Home feed of recommended content.

And more changes to Facebook are likely coming. Meta plans to introduce other features and updates to Facebook in the coming year to make social media still “feel social,” Mr. Alison said.

“It is, frankly, core to Facebook,” he said.

2 Democrats Whom Trump Fired From F.T.C. Sue Over Dismissals

By DAVID McCABE

WASHINGTON — Two Democratic former members of the Federal Trade Commission sued President Trump on Thursday over his decision to fire them from the agency, accusing him of an illegal overreach of executive power.

Mr. Trump fired the Democratic commissioners, Rebecca Kelly Slaughter and Alvaro Bedoya, on March 18, upending the consumer protection agency, which is typically run by three members from the president’s party and two from the opposing party.

In a lawsuit filed in the United States District Court for the District of Columbia, lawyers for Ms. Slaughter and Mr. Bedoya argued that Mr. Trump’s dismissals of them were without cause and violated federal law. They cited a 1935 Supreme Court precedent that said the president may not fire independent regulatory boards members solely over policy disagreements.

“In short, it is bedrock, binding precedent that a president cannot remove an F.T.C. commissioner without cause,” the lawsuit said. “The president’s action is indefensible under governing law.”

“The Trump administration operated within its lawful authority when it determined that the service of the former F.T.C. commissioners was inconsistent with the administration’s priorities,” said a White House spokeswoman, Taylor Rogers, in a statement.

The lawsuit was the latest legal battle to erupt over Mr. Trump’s attempts to expand the power of the presidency. In recent months, more than 50 court rulings have in many cases temporarily halted actions taken by the administration, ranging from its aggressive stance on deportations to its firing of civil servants.

The legal battles have also affected regulators that Congress set up to be independent from direct White House control. While regulators are appointed by the president, many have traditionally had wide latitude to determine the direction of their agencies.

But Mr. Trump earlier fired Gwynne Wilcox, a Democrat on the National Labor Relations Board, who was reinstated by a federal court this month. The administration has appealed that ruling.

Mr. Trump also signed an executive order last month that af-

fected the F.T.C., the Securities and Exchange Commission, the Federal Communications Commission and the National Labor Relations Board. The executive order instructed those agencies to submit proposed regulations to the White House for review, as well as declaring that they must accept as binding the interpretations of the law made by the president and the Justice Department, among other measures.

Ms. Slaughter and Mr. Bedoya’s lawsuit also named the two Republican F.T.C. commissioners — the agency’s chairman, Andrew Ferguson, and Melissa Holyoak — as defendants. They also named the agency’s executive director, David B. Robbins.

The 1914 law that established the F.T.C. says commissioners can be removed from the five-member board for “inefficiency, neglect of duty or malfeasance in office.” The Supreme Court reinforced those protections in the 1930s when President Franklin D. Roosevelt tried to fire a member of the F.T.C.

In a letter sent on behalf of Mr. Trump last week informing one of the commissioners of the termination, the White House said the protections established by the Supreme Court’s ruling didn’t apply to those who led the F.T.C. today.

On Thursday, Mr. Ferguson said in a statement posted to X that his “former colleagues are entitled to their day in court, but I have no doubt that President Trump’s lawful powers will ultimately be confirmed.”

In the lawsuit, lawyers for Ms. Slaughter and Mr. Bedoya said the two have been “denied access to their offices” and were now listed as former members of the commission on the F.T.C.’s website. Their staff have also been put on administration leave, according to the lawsuit.

The F.T.C. has been responsible for some of the biggest show-downs between corporate America and the federal government. In April, the agency is scheduled to face off against Meta, the owner of Facebook, Instagram and other apps, at an antitrust trial over whether the tech giant illegally stifled nascent competitors when it bought Instagram and WhatsApp.

The F.T.C. has also filed lawsuits against Amazon, arguing it made it hard for consumers to cancel its Prime subscription service and squeezed small merchants that use its site.

that granted the government additional time to find a buyer for TikTok, stressing that the goal is an outcome “that’s best for our country.” The president has raised the possibility that the U.S. government could acquire a stake in the app. “If it’s not finished, it’s not a big deal. We’ll extend it,” Mr. Trump said. Chinese officials maintain that any sale or divestiture must comply with local export laws, potentially giving Beijing power over any arrangement brokered by Mr. Trump.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE
In re: **DYNAMIC AEROSTRUCTURES LLC, et al.**, Chapter 11 Case No. 25-10292 (LSS) (Jointly Administered) Debtor(s)
NOTICE OF PROPOSED SALE OF ASSETS, STALKING HORSE APA, BIDDING PROCEDURES, AUCTION, AND SALE HEARING
PLEASE TAKE NOTICE that on February 26, 2025, the above-captioned Debtors and debtors in possession each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), in the United States Bankruptcy Court for the District of Delaware (the “Court”). The Debtors are seeking to sell (the “Sale”) all or substantially all of their assets (the “Assets”) free and clear of all liens other than Assumed Liabilities (each as defined in the Stalking Horse APA, as defined below). In connection with the Sale, the Debtors have entered into an asset purchase agreement dated as of February 25, 2025 (the “Stalking Horse APA”) with FMI Holdco LLC, subject to the Debtors’ acceptance of higher or otherwise better offers in accordance with the Summary of Key Dates Established by Bidding Procedures
Event/Deadline **Date**
Bidding Procedures/Hearing March 25, 2025
Bid Deadline April 2, 2025 at 4:00 p.m. (ET)
Deadline to object to approval of Sale to Stalking Horse Purchaser April 3, 2025 at 4:00 p.m. (ET)
Auction (if Necessary) April 4, 2025 at 10:00 a.m. (ET)
Adequate Assurance Object Deadline April 4, 2025 at 12:00 p.m. (ET)
File Notice of Successful Bidder April 5, 2025
Post-Auction Objection Deadline and Adequate Assurance Object Deadline (if Successful Bidder is not the Stalking Horse Purchaser) April 7, 2025 at 2:00 p.m. (ET)
PLEASE TAKE FURTHER NOTICE that by order, dated March 25, 2025 (Docket No. 169) (the “Bidding Procedures Order”), the Bankruptcy Court approved certain relief requested in the related motion (Docket No. 16) (the “Bidding Procedures Motion”), and certain “Bidding Procedures” that govern the sale of the Assets to the highest or otherwise best bidder. Copies of the Bidding Procedures Motion, the Bidding Procedures Order, the Bidding Procedures and the Stalking Horse APA are available for download at www.veritaglobal.net/FMIAeroststructures (the “Case Website”) or from the Debtors’ claims and noticing agent, Verita Global, via telephone at (888) 647-1726 (U.S./Canada) or (510) 751-2620 (International), or via email to fminfo@veritaglobal.com. A separate notice will be provided to counterparties to executory contracts and unexpired leases with the Debtors that may be assumed and assigned in connection with the Sale.
Any interested bidder should contact the Debtors’ investment banking advisor, **Configure Partners, LLC**, 3344 Peachtree Rd., N.E., Suite 1500, Atlanta, GA 30326 (Attn: Rory Keenan and Matt Guib), email: rkeenan@configurepartners.com and mguib@configurepartners.com.
PLEASE TAKE FURTHER NOTICE that the deadline to submit a bid or any Asssets **April 2, 2025 at 4:00 p.m. (ET)**.
PLEASE TAKE FURTHER NOTICE that an auction for the Assets, unless cancelled or adjourned in accordance with the Bidding Procedures Order, will be held on **April 4, 2025 at 10:00 a.m. (ET)**, at the offices of Chipman Brown Ciero & Cole LLP, 1513 N. Market Street, Suite 5400, Wilmington, DE 19801, or such later date and time as selected by the Debtors (following consultation with the Consultation Parties, Representatives of the Qualified Bidders, the Debtors, and the Consultation Parties) shall be permitted to attend the Auction in person. All other parties permitted to attend by the Bankruptcy Code, the Bankruptcy Rules, or the Bidding Procedures Motion, must attend the Auction in person by attendance prior to the Auction by sending an email to counsel to the Debtors (Attn: Gregg M. Galardi, gregg.galardi@opesgray.com); Mark L. Desrosiers (Attn: desrosiers@opesgray.com); Robert A. Weber (weber@opesgray.com); and Daniel G. Egan (egan@opesgray.com)).
PLEASE TAKE FURTHER NOTICE that unless adjourned in accordance with the Bidding Procedures Order, the Bankruptcy Court will conduct a hearing (the “Sale Hearing”) to consider the Sale on **April 2, 2025 at 2:00 p.m. (ET)**, subject to the Bankruptcy Court’s availability.
PLEASE TAKE FURTHER NOTICE that any objections approval of the Sale to the Stalking Horse Purchaser (each, a “Sale Objection”) must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules; (c) set forth the specific basis for the Sale Objection; (d) be filed with the Clerk of this Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801 (the “Clerk”); and (e) be filed with the Clerk of this Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801 (the “Clerk”), and proof of service of such Sale Objection upon the Objection Notice Parties (as defined below) shall be filed with the Court and when required by the Local Rules; and (e) be served upon the Objection Notice Parties. Sale Objections must be filed with the Clerk on or before **April 3, 2025 at 4:00 p.m. (ET)**, (the “Sale Objection Deadline”).
PLEASE TAKE FURTHER NOTICE that any objections approval of the Sale to a Successful Bidder other than the Stalking Horse Purchaser (each, a “Post-Auction Objection”) must: (a) be in writing; (b) comply with the Bankruptcy Rules and the Local Rules; (c) set forth the specific basis for the Post-Auction Objection; (d) be filed with the Clerk of this Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801 (the “Clerk”), and proof of service of such Post-Auction Objection upon the Objection Notice Parties (as defined below) shall be filed with the Court and when required by the Local Rules; and (e) be served upon the Objection Notice Parties. Post-Auction Objections must be filed with the Clerk on or before **April 7, 2025 at 2:00 p.m. (ET)**, (the “Post-Auction Objection Deadline”).
THE “Objection Notice Parties” are as follows: (i) counsel for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036 (Attn: Gregg M. Galardi, email: gregg.galardi@opesgray.com), and Chipman Brown Ciero & Cole LLP, 1513 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: Mark L. Desrosiers, email: desrosiers@opesgray.com and Robert A. Weber, email: desrosiers@opesgray.com); (ii) counsel for the Stalking Horse Purchaser, Troutman Peppers Locke LLP, 300 S. Grand Ave., 26th Floor, Los Angeles, CA 90071 (Attn: David Kupetz, email: david.kupetz@troutman.com); (iii) counsel for any statutory committee of unsecured creditors appointed in this chapter 11 case; (iv) counsel to the DIP Lender, King & Spaulding LLP, 1100 Louisiana St., Suite 4100, Houston, TX 77002 (Attn: Michael Fisher, email: mfisher@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); and (v) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, DE 19801 (Attn: Rosa Sierra-Fon, email: Rosa.Sierra-Fon@usdoj.gov).
PLEASE TAKE FURTHER NOTICE THAT FAILURE TO ABIDE BY THE BIDDING PROCEDURES, THE BIDDING PROCEDURES ORDER OR ANY OTHER APPLICABLE ORDER OF THE COURT ENTERED IN THESE CHAPTER 11 CASES MAY RESULT IN THE REJECTION OF YOUR BID AND YOUR DISQUALIFICATION FROM PARTICIPATING IN THE BIDDING FOR AND AUCTION OF ANY OF THE DEBTORS’ ASSETS.
PLEASE TAKE FURTHER NOTICE THAT IF A SALE OBJECTION OR POST-AUCTION OBJECTION IS NOT FILED AND SERVED ON OR BEFORE THE APPLICABLE SALE OBJECTION DEADLINE OR POST-AUCTION OBJECTION DEADLINE, THE SALE HEARING, THE BIDDING PROCEDURES ORDER, THE OBJECTION PARTY MAY ENTER THE SALE ORDER WITHOUT FURTHER NOTICE TO SUCH PARTY.
The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: Dynamic Aerosttructures LLC (3076); Dynamic Aerosttructures Intermediate LLC (9800); and Forrest Machining LLC (3421). The Debtors’ service address is 27756 Avenue Mentry, Valencia, California 91355.
¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Bidding Procedures Order and Bidding Procedures (each as defined below).

Trump Floats Chinese Tariff Cuts in Trade for TikTok Deal

By TONY ROMM

President Trump on Wednesday raised the possibility that he could relax steep upcoming tariffs on China in exchange for the country’s support on a deal to sell TikTok to a new owner supported by the United States.

Acknowledging that Beijing is “going to have to play a role” in any transaction, Mr. Trump signaled to reporters at the White House that he could be open to negotiation. “Maybe I’ll give them a little reduction in tariffs or something to get it done,” he said. Under a law enacted before Mr.

Trump took office, the Chinese-based parent company of TikTok must either sell the social media app’s U.S. operations or face what essentially amounts to a domestic ban. Lawmakers adopted that policy in response to growing, bipartisan concerns that the app posed threats to U.S. national security, which TikTok denies.

Congress originally set a January deadline for its ultimatum. But no sale occurred, prompting Mr. Trump — as one of his first executive actions — to delay enforcement of the law for 75 days in the hopes of securing a buyer. The new deadline arrives on

April 5, just three days after Mr. Trump separately plans to announce what he has described as “reciprocal” tariffs, imposing new duties on foreign nations based on the trade barriers that they erect to U.S. imports. The president has already subjected Chinese goods to a 20 percent tariff, on top of those he enacted during his first term in office.

“Every point in tariffs is worth more than TikTok,” Mr. Trump said about the prospects of a negotiation, adding: “Sounds like something I’d do.” Mr. Trump said on Wednesday that he could issue another order