

**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 Nos. 82 and 83

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' MOTION TO FILE UNDER SEAL**

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 *Motion for Entry of Order Approving Settlement with Northrop Grumman Systems Corporation* [Docket No. 82] and the related *Debtors' Motion to File under Seal* [Docket No. 83] (the “**Motion to Seal**”).

2. Pursuant to the notice, the deadline to file objections regarding the relief requested in the Motion to Seal was set for March 18, 2025, at 4:00 p.m. (Eastern Time), extended to March 21, 2025 at 10:00 a.m. (ET) (the “**Objection Deadline**”) for the Office of the United States Trustee (the “**U.S. Trustee**”).

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

4. 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

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.



Revised Order has been reviewed by counsel to the U.S. Trustee and is acceptable to the U.S. Trustee.

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

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

Dated: April 7, 2025

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Counsel to the Debtors and Debtors in Possession

EXHIBIT A

Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE 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 Nos. 83, 192
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**ORDER AUTHORIZING DEBTORS TO FILE 9019 MOTION AND NGSC
SETTLEMENT UNDER SEAL**

Upon the Debtors' motion (the "Seal Motion")² for entry of an order (this "Order") authorizing the Debtors to file the 9019 Motion and NGSC Settlement under seal, all as more fully set forth in the Seal Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Seal Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Seal Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Seal Motion is in the best interests of the Debtors, their estates, their creditors,

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Seal Motion and 9019 Motion, as applicable.

and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Seal Motion is GRANTED, as set forth herein.
2. The Debtors are authorized to file the NGSC Settlement under seal.
3. To the extent not already filed, the Debtors are directed to file a redacted version of the 9019 Motion with the agreed redacted NGSC Settlement, as filed at Docket No. 192, within the applicable time periods prescribed by the Bankruptcy Rules and Local Rules; *provided, however*, that the Debtors shall provide an unredacted version of the 9019 Motion, including the NGSC Settlement to (a) the Court, (b) the U.S. Trustee, and (c) on an attorneys eyes only basis, to counsel for any official committee that may be appointed in the Chapter 11 Cases, and counsel for the DIP Agent.
4. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.
5. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Redline Order

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

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Dynamic Aerostructures LLC, *et al.*,

Debtors.¹

Chapter 11

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Input:	
Document 1 ID	netdocuments://4900-9388-8562/1
Description	Settlement Agreement Seal Order
Document 2 ID	netdocuments://4900-9388-8562/2
Description	Settlement Agreement Seal Order
Rendering set	Standard

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

Statistics:	
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Insertions	6
Deletions	5
Moved from	0
Moved to	0
Style changes	0
Format changes	0
Total changes	11