

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

In re:	Chapter 11
Dynamic Aerostructures LLC, <i>et al.</i> ,	Case No. 25-10292 (LSS)
Debtors. <sup>1</sup>	(Jointly Administered)
	Objection Deadline: May 6, 2025 at 4:00 p.m. (ET)

**FIRST MONTHLY APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP,  
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL  
TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD  
FROM FEBRUARY 26, 2025 THROUGH AND INCLUDING MARCH 31, 2025**

*Name of Applicant:* Chipman Brown Cicero & Cole, LLP

*Authorized to Provide Professional Services to:* Debtors and Debtors in Possession, Effective as of February 26, 2025

*Period for Which Compensation and Reimbursement is Sought:* February 26, 2025, through March 31, 2025

*Amount of Compensation Sought as Actual, Reasonable and Necessary:* \$203,800.00 (80% = \$163,040.00)

*Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:* \$5,820.62

This is a(n) \_\_\_\_\_ Interim  Monthly \_\_\_\_\_ Final Fee Application.

Prior Applications: None.

The total time expended in connection with the preparation of this fee application is not included herein as such time was expended after the Application Period.

<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 27750  
91355.



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In re:

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Debtors.<sup>1</sup>

Chapter 11

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Pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), Chipman Brown Cicero & Cole, LLP (“**CBCC**”), counsel to the debtors and debtors in possession (the “**Debtors**”), hereby submits its first monthly application (the “**Application**”) for compensation and reimbursement of expenses for the period from February 26, 2025 through and including March 31, 2025 (the “**Application Period**”). By this Application, CBCC seeks a monthly interim allowance of compensation in the amount of \$203,800.00 and actual expenses in the amount of \$5,820.62, for an aggregate total of \$209,620.62 in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 132] entered March 20, 2025 (the “**Interim Compensation Order**”). CBCC hereby seeks payment of \$163,040.00 (80% of the allowed fees) and reimbursement of \$5,820.62 (100% of allowed

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<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.

expenses), for an aggregate total payment of \$168,860.62 for the Application Period upon the filing of a certificate of no objection. In support thereof, CBCC respectfully represents as follows:

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction over the Debtors, their estates, and this matter under 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. This is a core proceeding under 28 U.S.C. § 157(b).

2. Venue of this proceeding and this Application is proper in this district pursuant to 28 U.S.C. § 1408.

3. Pursuant to Local Rule 9013-1(f), CBCC consents to the entry of a final order by the Court in connection with this Application, to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

4. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016 and Local Rule 2016-1.

### **BACKGROUND**

#### **A. GENERAL BACKGROUND.**

5. On February 26, 2025 (the “**Petition Date**”), the Debtors commenced these cases (the “**Chapter 11 Cases**”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

6. The Debtors are authorized to continue operating their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

7. No committee has been appointed in the Chapter 11 Cases. No trustee or examiner has been appointed in these Chapter 11 Cases.

8. On March 20, 2025, the Court entered the Interim Compensation Order, authorizing certain professionals (“**Professionals**”) to submit monthly applications for compensation and reimbursement for expenses pursuant to the procedures specified therein. If no objections are made within twenty-one (21) days after service of the monthly fee application, the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses.

**B. THE RETENTION OF CHIPMAN BROWN CICERO & COLE, LLP.**

9. 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 “**Retention Application**”).

10. On March 21, 2025, the Court entered the *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. 153] (the “**Retention Order**”).

**RELIEF REQUESTED**

11. Subject to Court approval, CBCC seeks payment for compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by CBCC during the Application Period. With the exception of copy charges (which are charged at a lower rate), the rates charged by CBCC in these Chapter 11 Cases do not differ from the rates charged to CBCC’s non-bankruptcy clients.

12. This Application is the first monthly fee application filed by CBCC in these Chapter 11 Cases. In connection with the professional services described below, by this Application CBCC seeks allowance of compensation in the amount of \$203,800.00 and reimbursement of actual and necessary expenses in the amount of \$5,820.62 for the Application Period.

**A. COMPENSATION REQUESTED.**

13. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Debtor during the Application Period, the regular customary billing rates and the total value of time incurred by each of the CBCC attorneys rendering services to the Debtor is attached hereto as **Exhibit A**.

14. A copy of the computer-generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (the "**Guidelines**"), is attached hereto as **Exhibit B**.

**B. EXPENSE REIMBURSEMENT.**

15. CBCC incurred out-of-pocket expenses during the Application Period in the amount of \$5,820.62. A statement of expenses incurred by CBCC during the Application Period is attached as **Exhibit C**. All time entries and requested expenses are in compliance with Rule 2016-1 of the Local Rules.<sup>2</sup>

16. Pursuant to Local Rule 2016-1, CBCC represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Application Period:

- (a) Copy charges and photocopying expenses were \$.10 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage and operation of copy and

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<sup>2</sup> CBCC has also attempted to ensure that this Application complies with the Guidelines. To the extent that the Guidelines conflict with the Local Rules, in particular, Local Rule 2016-1, CBCC has chosen to comply with such Local Rule. CBCC will supplement this Application with additional detail or information upon request.

printer machines, together with a margin for recovery of related expenditures. In addition, CBCC often utilizes outside copier services for high volume projects, and this Application seeks the recovery of those costs, if applicable;

- (b) Incoming facsimiles are not billed;
- (c) Outgoing facsimiles are billed at the rate of \$.25 per page;
- (d) Toll telephone charges are not billed; and
- (e) Computer assisted legal research charges are billed at actual costs.

### **RESPONSES TO FEE GUIDELINES QUESTIONNAIRE**

QUESTION	RESPONSE	EXPLANATION
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No	N/A
If the fees sought in this fee application as compared to the fees budgeted for this time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	No	N/A
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?	No	N/A
If the fee application includes any rate increases since retention: <ul style="list-style-type: none"> <li>i. Did your client review and approve those rate increases in advance?</li> <li>ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA formal Ethics Opinion 11-458?</li> </ul>	N/A	N/A

### **LEGAL STANDARD**

17. Section 330(a)(1) of the Bankruptcy Code allows the payment of:

- (A) Reasonable compensation for actual, necessary services rendered by the trustee, examiner, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) Reimbursement for actual, necessary expenses.

11 U.S.C. § 330(a)(1). Reasonableness of compensation is driven by the “market-driven approach” which considers the nature, extent and value of services provided by the professional and cost of comparable services in the non-bankruptcy contexts. *See Zolfo Cooper & Co. v. Sunbeam-Oster Co.*, 50 F.3d 253, 258 (3d Cir. 1995); *In re Busy Beaver Building Ctr., Inc.*, 19 F.3d 833, 849 (3d Cir. 1994). Thus, the “baseline rule is for firms to receive their customary rates.” *Zolfo Cooper*, 50 F.3d at 259.

18. In accordance with its practices in non-bankruptcy matters, CBCC has calculated its compensation requested in this Application by applying its standard hourly rates. CBCC’s calculation is based upon hourly rates that are well within the range of rates that are charged by comparable firms in similar bankruptcy cases. Accordingly, CBCC’s rates should be determined to be reasonable under section 330 of the Bankruptcy Code.

19. CBCC’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity, accelerated deadlines, and size of the Debtors’ Chapter 11 Cases. CBCC’s fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, CBCC’s fees are reasonable pursuant to section 330 of the Bankruptcy Code.

20. Section 330(a)(1)(B) of the Bankruptcy Code permits reimbursement for actual, necessary expenses. CBCC’s legal services and expenses incurred during the Application Period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Debtors’ estates. CBCC properly requested reimbursement of only actual, necessary and appropriate legal expenses.

21. Except as permitted by Bankruptcy Rule 2016, no agreement or understanding exists between CBCC and/or any third person for the sharing or division of compensation. All of the services for which compensation is requested in this Application were rendered at the request of and solely on behalf of the Debtors.

22. Pursuant to the standards set forth in sections 330 and 331 of the Bankruptcy Code, CBCC submits that the compensation requested is for actual and necessary services and expenses, and is reasonable, based upon the nature, extent and value of such services, the time spent thereon, and the costs of comparable services in a case under the Bankruptcy Code.

23. The time records annexed to this Application constitute only a general statement of the services rendered and time expended without description of the pressure and constraints under which CBCC actually rendered these services. The considerable challenges of this case have been attended to and managed by CBCC at all levels, promptly, expertly, and often to the exclusion of the other matters in CBCC's office. CBCC submits, therefore, that its fees and expenses were actual, necessary, reasonable, and justified, and should be allowed in full.

#### **RESERVATION OF RIGHTS**

24. To the extent time or disbursement charges for services rendered or disbursements incurred relate to the Application Period but were not processed prior to the preparation of this Application, or CBCC has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Application Period, CBCC reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.



**CERTIFICATE OF COMPLIANCE AND WAIVER**

25. The undersigned representative of CBCC certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, CBCC believes that such deviations are not material and respectfully requests that any such requirements be waived.

**CONCLUSION**

WHEREFORE, CBCC respectfully requests (a) that it be allowed compensation in the amount of \$203,800.00 for professional services rendered (80% or \$163,040.00 of which is to be paid upon the filing of a certificate of no objection), and reimbursement of expenses in the amount of \$5,820.62 (100% of which is to be paid upon the filing of a certificate of no objection) for the Application Period; and (b) that the Court authorize and direct the Debtors to pay CBCC the amounts due and owing hereunder in accordance with the Interim Compensation Order.

Dated: April 15, 2025

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark L. Desgrosseilliers

Robert A. Weber (No. 4013)

Mark L. Desgrosseilliers (No. 4083)

Hercules Plaza

1313 North Market Street, Suite 5400

Wilmington, Delaware 19801

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weber@chipmanbrown.com

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-and-

**CHIPMAN BROWN CICERO & COLE, LLP**

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

501 5<sup>th</sup> Ave. 15<sup>th</sup> Floor

New York, New York 10017

Telephone: (646) 741-5529

egan@chipmanbrown.com

*Co-Counsel to the Debtors and Debtors in Possession*

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

In re:  Dynamic Aerostructures LLC, <i>et al.</i> ,  Debtors. <sup>1</sup>	Chapter 11  Case No. 25-10292 (LSS)  (Jointly Administered)
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**VERIFICATION**

STATE OF DELAWARE                    )  
   )     SS  
 COUNTY OF NEW CASTLE            )

I, Mark L. Desgrosseilliers, being duly sworn according to law, deposes and says:

1. I am a partner in the law firm of Chipman Brown Cicero & Cole, LLP, counsel to Dynamic Aerostructures LLC and its affiliated Debtors.

2. I have read the foregoing Application of Chipman Brown Cicero & Cole, LLP for allowance of compensation and reimbursement of expenses and know the contents thereof, and the same are correct to the best of my knowledge, information and belief.

3. I have reviewed the requirements of Local Rule 2016-1 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief this Application complies with Local Rule 2016-1.

Dated: April 15, 2025

*/s/ Mark L. Desgrosseilliers*  
 Mark L. Desgrosseilliers (No. 4083)

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<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.

**EXHIBIT A****COMPENSATION BY PROFESSIONAL FOR THE PERIOD  
FEBRUARY 26, 2025 THROUGH AND INCLUDING MARCH 31, 2025**

<b>NAME OF PROFESSIONAL INDIVIDUAL</b>	<b>POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE</b>	<b>HOURLY BILLING RATE</b>	<b>TOTAL HOURS BILLED</b>	<b>TOTAL COMPENSATION</b>
William E. Chipman, Jr.	Partner; Member of the Delaware Bar since 1999	\$950	2.9	\$2,755.00
Robert A. Weber	Partner; Member of the Delaware Bar since 2000	\$875	9.3	\$8,137.50
Mark L. Desgrosseilliers	Partner; Member of the Delaware Bar since 2001	\$850	88.2	\$74,970.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$750	118.9	\$89,175.00
Daniel Egan	Partner; Member of the New York Bar since 2008	\$375	7.2	\$2,700.00
Aaron Bach	Associate; Member of the Delaware Bar since 2024	\$400	10.1	\$4,040.00
Alison Maser	Associate; Member of the Delaware Bar since 2024	\$400	1.8	\$720.00
Renaë M. Fusco	Paralegal	\$350	60.4	\$21,140.00
Lauren Hitchens	Paralegal	\$325	.5	\$162.50
<b>TOTAL:</b>			<b>299.3</b>	<b>\$203,800.00</b>
			<b>ATTORNEY COMPENSATION:</b>	<b>\$182,497.50</b>
			<b>TOTAL ATTORNEY HOURS:</b>	<b>238.4</b>
			<b>BLENDED HOURLY RATE OF ALL TIMEKEEPERS:</b>	<b>\$680.92</b>

**EXHIBIT B****COMPENSATION BY PROJECT CATEGORY**

<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
B110 Case Administration	49.8	\$27,185.00
B120 Asset Analysis and Recovery	0.0	\$0.00
B130 Asset Disposition	65.0	\$46,820.00
B140 Relief from Stay/Adequate Protection Proceeding	1.1	\$940.00
B150 Meetings of and Communications with Creditors	6.8	\$4,060.00
B160 Fee/Employment Applications	33.2	\$20,605.00
B170 Fee/Employment Objections	0.0	\$0.00
B180 Avoidance Action Analysis	0.0	\$0.00
B185 Assumption/Rejection of Leases and Contracts	13.1	\$9,330.00
B190 Other Contested Matters (excluding assumption/rejection motions)	39.1	\$28,090.00
B195 Non-Working Travel (billed at ½ rate)	7.2	\$2,700.00
B200 Operations	0.0	\$0.00
B210 Business Operations	38.6	\$28,800.00
B220 Employee Benefits/Pension	.4	\$140.00
B230 Financing/Cash Collateral	44.4	\$34,920.00
B240 Tax Issues	.6	\$210.00
B250 Real Estate	0.0	\$0.00
B260 Board of Director Matters	0.0	\$0.00
B300 Claims and Plan	0.0	\$0.00
B310 Claims Administration and Objections	0.0	\$0.00
B320 Plan and Disclosure Statement (including business plan)	0.0	\$0.00
B400 Bankruptcy-Related Advice	0.0	\$0.00
B410 General Bankruptcy Advice/Opinions	0.0	\$0.00
B420 Restructurings	0.0	\$0.00
<b>TOTAL:</b>	<b>299.3</b>	<b>\$203,800.00</b>

Date	User	Activity	Description	Hours	Rate	Total
2/26/2025	Renae Fusco	B110 Case Administration	finalize & efile petitions & first day motions (2.1); finalize Egan pro hac (.1); coordinate prep of 1st day binders (.2); efile Egan pro hac (.1); upload order re same (.1); edit agenda (.3); prep 1st day orders (1.6); edit 2nd day hearing notice (.2); draft notice of commencement (.6); draft COC re cash management order (.3); efile agenda (.1); coordinate service of agenda (.1); set up zoom appearances (.2)	6.00	\$350.00	\$2,100.00
2/26/2025	Robert Weber	B110 Case Administration	review filing and case assignment information (.2); correspondence with D. Egan M. Desgrosseilliers regarding same (.1)	0.30	\$875.00	\$262.50
2/27/2025	Lauren Hitchens	B110 Case Administration	Prepare for hearing	0.50	\$325.00	\$162.50
2/27/2025	Mark Desgrosseilliers	B110 Case Administration	Review hearing dates and request for same	0.30	\$850.00	\$255.00
2/27/2025	Renae Fusco	B110 Case Administration	prepare redlines of UST versions v filed versions(.3); prepare for first day hearing (.8); draft amended agenda (.2); attend Zoom first day hearing (2.5); edit interim orders (.4); edit & upload interim orders (.3); download entered orders (.2); prepare binder of UST requested docs re IDI (.3); draft COC re critical vendor interim order (.2); run blackline of CV order (.2); efile COC (.2); upload order (.1)	5.70	\$350.00	\$1,995.00
2/28/2025	Alison Maser	B110 Case Administration	Draft suggestion of bankruptcy (.3); draft Verita retention application (.8); draft interim compensation procedures motion (.4)	1.50	\$400.00	\$600.00
2/28/2025	Daniel Egan	B110 Case Administration	revise schedule of parties in interest	0.40	\$750.00	\$300.00
2/28/2025	Mark Desgrosseilliers	B110 Case Administration	Review US Trustee reporting requirements	0.40	\$850.00	\$340.00
2/28/2025	Renae Fusco	B110 Case Administration	edit notice of 2nd day hearing (.4); circulate 1st day hearing transcript (.1); draft critical dates list (.9); send S Finley critical vendor docs (.1); emails w D Egan re notice periods (.1); emails w Verita re creditor matrix (.1); prep email to client attaching entered interim orders (.1); efile notice of 2nd day hearing (.1); coordinate service of same (.1)	2.00	\$350.00	\$700.00
3/1/2025	Daniel Egan	B110 Case Administration	revise notice of bankruptcy for state court proceedings	0.20	\$750.00	\$150.00
3/3/2025	Alison Maser	B110 Case Administration	Draf interim compensation procedures motion	0.30	\$400.00	\$120.00
3/3/2025	Renae Fusco	B110 Case Administration	efile redacted & unredacted creditor lists	0.30	\$350.00	\$105.00
3/3/2025	Renae Fusco	B110 Case Administration	emails w D Egan M Desgrosseilliers re filing (.2); emails w Court re same (.1); review docket re filing issues (.1)	0.40	\$350.00	\$140.00
3/4/2025	Renae Fusco	B110 Case Administration	email to M Desgrosseilliers and D Egan regarding FMI customer	0.10	\$350.00	\$35.00
3/4/2025	Renae Fusco	B110 Case Administration	draft NOF re critical vendor final order (.2); efile same (.2); coordinate service of same (.1)	0.50	\$350.00	\$175.00
3/5/2025	Mark Desgrosseilliers	B110 Case Administration	Respond to information requests from the US Trustee (.4); communications with client regarding IDI and 341 (.2); prepare for same (.3)	0.90	\$850.00	\$765.00
3/6/2025	Mark Desgrosseilliers	B110 Case Administration	Review IDI information (.4); prepare for meeting with Trustee and advisors (.2); review meeting of creditors notice (.1); schedule same with US Trustee (.2)	0.90	\$850.00	\$765.00
3/7/2025	Renae Fusco	B110 Case Administration	circulate Southern CA Edison utility objection (.1); review issues regarding letter agreement w utilities (.3); finalize & efile Fanto pro hac motion (.1); upload order (.1)	0.60	\$350.00	\$210.00
3/10/2025	Daniel Egan	B110 Case Administration	review and comment on 341 notice (.2); review case scheduling issues (.2)	0.40	\$750.00	\$300.00
3/10/2025	Mark Desgrosseilliers	B110 Case Administration	Review US Trustee requests in connection with initial debtor interview (.2); respond to same (.2); communications with client regarding IDI (.2)	0.60	\$850.00	\$510.00
3/11/2025	Daniel Egan	B110 Case Administration	call with client regarding trustee meeting (.3); review and comment on case notices (.2)	0.50	\$750.00	\$375.00
3/11/2025	Mark Desgrosseilliers	B110 Case Administration	Prepare for initial debtor interview	0.80	\$850.00	\$680.00
3/11/2025	Renae Fusco	B110 Case Administration	prepare orders re 2nd day hearing	0.90	\$350.00	\$315.00
3/12/2025	Daniel Egan	B110 Case Administration	attend initial debtor interview (.5); review materials for same (.2)	0.70	\$750.00	\$525.00
3/12/2025	Mark Desgrosseilliers	B110 Case Administration	Prepare for initial debtor interview (.7); attend same (.6); follow-up concerning same (.2)	1.50	\$850.00	\$1,275.00

Chipman Brown Cicero Cole LLP  
February 26, 2025 - March 31, 2025

Dynamic Aerostructures LLC  
Case No. 25-10292 (LSS)

Invoice No. 18152  
April 15, 2025

3/13/2025	Mark Desgrosseilliers	B110 Case Administration	Follow-up regarding initial debtor interview and US Trustee additional information request	0.70	\$850.00	\$595.00
3/13/2025	Renaë Fusco	B110 Case Administration	draft 2nd day agenda	2.20	\$350.00	\$770.00
3/13/2025	Renaë Fusco	B110 Case Administration	emails w M Degrosseilliers re hearing date (.1); email to L Johnson re same (.1)	0.20	\$350.00	\$70.00
3/14/2025	Daniel Egan	B110 Case Administration	review and comment on notices for case filings	0.20	\$750.00	\$150.00
3/14/2025	Renaë Fusco	B110 Case Administration	draft COC re 4/7 hearing date (.2); efile same (.1); upload order (.1); coordinate service of order (.1)	0.50	\$350.00	\$175.00
3/17/2025	Renaë Fusco	B110 Case Administration	email to M Desgrosseilliers regarding first day hearing transcript	0.10	\$350.00	\$35.00
3/18/2025	Daniel Egan	B110 Case Administration	review and comment on certifications of counsel	0.30	\$750.00	\$225.00
3/18/2025	Renaë Fusco	B110 Case Administration	revise agenda	0.30	\$350.00	\$105.00
3/19/2025	Daniel Egan	B110 Case Administration	review and comment on certifications of counsel (.3); review and revise supplemental declaration (.4)	0.70	\$750.00	\$525.00
3/19/2025	Renaë Fusco	B110 Case Administration	revise 3/25 agenda	0.90	\$350.00	\$315.00
3/20/2025	Daniel Egan	B110 Case Administration	review and revise hearing agenda	0.30	\$750.00	\$225.00
3/20/2025	Mark Desgrosseilliers	B110 Case Administration	Prepare notice of agenda	0.80	\$850.00	\$680.00
3/20/2025	Renaë Fusco	B110 Case Administration	revise 3/25 agenda (1.1); email to M Desgrosseilliers and D Egan regarding signed orders (.4)	1.50	\$350.00	\$525.00
3/21/2025	Daniel Egan	B110 Case Administration	further revise agenda (.2); correspondence with client and BRG regarding hearing (.3)	0.50	\$750.00	\$375.00
3/21/2025	Mark Desgrosseilliers	B110 Case Administration	Review notice of agenda (.9); review status of MORs (.1); review status of schedules and statements (.2)	1.20	\$850.00	\$1,020.00
3/21/2025	Renaë Fusco	B110 Case Administration	revise agenda (.6); efile same (.1); coordinate service of same (.1); coordinate prep of hearing binders (.2); set up zoom hearing appearances (.2); coordinate in person attendance (.1); circulate signed orders (.2); coordinate service of signed order (.2)	1.70	\$350.00	\$595.00
3/21/2025	Robert Weber	B110 Case Administration	review orders recent filings and second day hearing matters	0.40	\$875.00	\$350.00
3/23/2025	Daniel Egan	B110 Case Administration	correspondence with the client regarding schedules and SOFAs	0.20	\$750.00	\$150.00
3/24/2025	Daniel Egan	B110 Case Administration	review revised agenda (.1); review draft operating reports (.6); call with BRG regarding same (.4)	1.10	\$750.00	\$825.00
3/24/2025	Mark Desgrosseilliers	B110 Case Administration	Review notice of agenda (.3); review Prudential share information (.1); communication with Office of U.S. Trustee regarding same (.2)	0.60	\$850.00	\$510.00
3/24/2025	Renaë Fusco	B110 Case Administration	draft amended agenda (.9); emails with D. Egan re same (.2); efile amended agenda (.1); coordinate service of same (.1)	1.30	\$350.00	\$455.00
3/24/2025	William Chipman	B110 Case Administration	Multiple communications with M. Desgrosseilliers and D. Egan related to hearing on bidding procedures (.2); review agenda and comment on same (.2)	0.40	\$950.00	\$380.00
3/25/2025	Daniel Egan	B110 Case Administration	review and comment on revised operating reports	0.30	\$750.00	\$225.00
3/25/2025	Mark Desgrosseilliers	B110 Case Administration	Review draft monthly operating reports	0.30	\$850.00	\$255.00
3/25/2025	Renaë Fusco	B110 Case Administration	prepare for hearing	1.10	\$350.00	\$385.00
3/26/2025	Daniel Egan	B110 Case Administration	review and comment on schedules and SOFAs (2.3); call with BRG regarding same (.7)	3.00	\$750.00	\$2,250.00
3/26/2025	Mark Desgrosseilliers	B110 Case Administration	Address IDI information for US Trustee (.2); review schedules and statements prior to filing same (.4)	0.60	\$850.00	\$510.00
3/28/2025	Renaë Fusco	B110 Case Administration	circulate 3/25 hearing transcript	0.10	\$350.00	\$35.00
3/31/2025	Daniel Egan	B110 Case Administration	call with client regarding 341 meeting (.3); review and comment on OCP declaration (.2)	0.50	\$750.00	\$375.00
3/31/2025	Mark Desgrosseilliers	B110 Case Administration	Prepare for 341 meeting (.8); call with client and BRG regarding same (.3)	1.10	\$850.00	\$935.00
			<b>B110 Case Administration</b>	<b>49.80</b>		<b>\$27,185.00</b>

Chipman Brown Cicero Cole LLP  
February 26, 2025 - March 31, 2025

Dynamic Aerostructures LLC  
Case No. 25-10292 (LSS)

Invoice No. 18152  
April 15, 2025

2/26/2025	Daniel Egan	B130 Asset Disposition	revise bidding procedures motion and exhibits (.8); correspondence with buyer regarding sale issues (.3)	1.10	\$750.00	\$825.00
2/28/2025	Daniel Egan	B130 Asset Disposition	correspondence with Configure regarding sale issues (.3); review sale NDAs (.6)	0.90	\$750.00	\$675.00
2/28/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review NDAs regarding sale (.7); review potential bidder communications (.2)	0.90	\$850.00	\$765.00
2/28/2025	Renae Fusco	B130 Asset Disposition	draft notice re bid procedures motion (.2); draft notice re cure amounts motion (.2); efile cure motion notice (.1); efile bid procedures notice (.1); coordinate service of notices (.1)	0.70	\$350.00	\$245.00
3/2/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review non-disclosure agreements (.6); review sale inquiries (.2)	0.80	\$850.00	\$680.00
3/3/2025	Daniel Egan	B130 Asset Disposition	analyze sale issues (.6); call with Ropes regarding same (.3); revise bidding procedures order bidding procedures and sale and assignment notices (1.7); draft amended notice regarding bidding procedures and sale (.4); various correspondence with lender and buyer regarding sale documents (.7)	3.70	\$750.00	\$2,775.00
3/3/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review sale issues and timeline for same	0.90	\$850.00	\$765.00
3/3/2025	Renae Fusco	B130 Asset Disposition	emails w Verita re service of revised bid procedures order & notice	0.20	\$350.00	\$70.00
3/3/2025	Renae Fusco	B130 Asset Disposition	finalize amended bid procedures notice & revised order for filing (.2); efile and coordinate service of same (.2)	0.40	\$350.00	\$140.00
3/3/2025	Robert Weber	B130 Asset Disposition	communications with R. Hardy and Configure regarding expression of interest from third party	0.30	\$875.00	\$262.50
3/4/2025	Daniel Egan	B130 Asset Disposition	call with Configure regarding sale process (.6); review APA and related documents regarding sale issues (.5)	1.10	\$750.00	\$825.00
3/5/2025	Aaron Bach	B130 Asset Disposition	Draft sale order	2.80	\$400.00	\$1,120.00
3/5/2025	Daniel Egan	B130 Asset Disposition	revise draft sale documents(.6); correspondence with client and Configure regarding sale process (.4); analyze sale issues (.6)	1.60	\$750.00	\$1,200.00
3/5/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review NDAs in connection with sale	1.20	\$850.00	\$1,020.00
3/6/2025	Daniel Egan	B130 Asset Disposition	analyze sale and APA issues (.8); review and revise sale order (1.2)	2.00	\$750.00	\$1,500.00
3/6/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review NDAs (.7); review sale and timing of same (.2)	0.90	\$850.00	\$765.00
3/7/2025	Daniel Egan	B130 Asset Disposition	continue to review and revise sale order	0.70	\$750.00	\$525.00
3/10/2025	Daniel Egan	B130 Asset Disposition	further review and revise sale order (.9); correspondence with buyer and client regarding same (.3)	1.20	\$750.00	\$900.00
3/10/2025	Renae Fusco	B130 Asset Disposition	circulate Rexford cure objection	0.10	\$350.00	\$35.00
3/11/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review assumption issues in connection with contracts to be assumed under sale order (.6); review sale order (.3); review non-disclosure agreements with potential bidders (.8)	1.70	\$850.00	\$1,445.00
3/12/2025	Daniel Egan	B130 Asset Disposition	review revised sale order (.4); correspondence with buyer and lender regarding same (.2)	0.60	\$750.00	\$450.00
3/13/2025	Daniel Egan	B130 Asset Disposition	call with lender regarding sale and APA (.4); analyze sale and contract issues (1.4)	1.80	\$750.00	\$1,350.00
3/13/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review non-disclosure agreements (.4); prepare for sale hearing (.2)	0.60	\$850.00	\$510.00
3/13/2025	Renae Fusco	B130 Asset Disposition	draft NOF re sale order (.4); edit cure amount order (.2)	0.60	\$350.00	\$210.00
3/14/2025	Daniel Egan	B130 Asset Disposition	review and revise sale order bidding procedures order bidding procedures and sale notices (3.2); various correspondence with client buyer and lender regarding same (.5);	3.70	\$750.00	\$2,775.00
3/14/2025	Mark Desgrosseilliers	B130 Asset Disposition	Revise non-disclosure agreements in connection with sale (.6); review sale order (.3)	0.90	\$850.00	\$765.00
3/14/2025	Renae Fusco	B130 Asset Disposition	email to M Desgrosseilliers D Egan re sale hearing date (.1); emails w D Egan re bid procedures order & related docs (.1); draft NOF re APA schedules (.3); edit sale order (.1); efile proposed sale order (.2); coordinate service of same (.1)	0.90	\$350.00	\$315.00
3/15/2025	Daniel Egan	B130 Asset Disposition	correspondence with buyer regarding sale issues	0.20	\$750.00	\$150.00
3/16/2025	Daniel Egan	B130 Asset Disposition	revise sale and assignment notices (.3); revise bid procedures and order (.5); correspondence with client and UST regarding same (.2)	1.00	\$750.00	\$750.00



Chipman Brown Cicero Cole LLP  
February 26, 2025 - March 31, 2025

Dynamic Aerostructures LLC  
Case No. 25-10292 (LSS)

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3/17/2025	Daniel Egan	B130 Asset Disposition	call with UST regarding bid procedures (.1); correspondence with client and buyer regarding APA schedules (.4)	0.50	\$750.00	\$375.00
3/17/2025	Renaë Fusco	B130 Asset Disposition	revise NOF regarding APA schedules (.2); efile same (.2)	0.40	\$350.00	\$140.00
3/18/2025	Daniel Egan	B130 Asset Disposition	call with environmental counsel and buyer regarding environmental issues (.5); review draft consent decree (1.2); correspondence with client regarding same (.2); review draft sale and financing objections (.5); correspondence with client and buyer regarding same (.2); analyze sale issues (.6)	3.20	\$750.00	\$2,400.00
3/18/2025	Renaë Fusco	B130 Asset Disposition	correspondence with D. Egan regarding sale objection	0.10	\$350.00	\$35.00
3/19/2025	Daniel Egan	B130 Asset Disposition	call with creditor regarding sale and DIP objection (.3); draft publication notice (.3); correspondence with Verita regarding same (.2); review and revise sale order (.8); correspondence with client buyer and creditor regarding same (.2)	1.80	\$750.00	\$1,350.00
3/20/2025	Daniel Egan	B130 Asset Disposition	correspondence with buyer and creditors regarding sale and contract assignment issues (.9); call with Configure regarding sale (.4); review and revise bid procedures and notice regarding same (.4)	1.70	\$750.00	\$1,275.00
3/20/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for hearing on bidding procedures (.9); review NDAs regarding sale (.3); communications with client regarding bidding procedures (.2)	1.40	\$850.00	\$1,190.00
3/20/2025	Renaë Fusco	B130 Asset Disposition	draft NOF revised bidding procedures (.4); efile same (.2); coordinate service of same (.1)	0.70	\$350.00	\$245.00
3/20/2025	Robert Weber	B130 Asset Disposition	analyze issues regarding credit bid matters	0.50	\$875.00	\$437.50
3/21/2025	Daniel Egan	B130 Asset Disposition	research regarding sale issues (1.2); review response to sale motion (.2)	1.40	\$750.00	\$1,050.00
3/21/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review TRM statement (.2); review correspondence concerning TRM (.2); prepare for bidding procedures hearing (.4)	0.80	\$850.00	\$680.00
3/23/2025	Daniel Egan	B130 Asset Disposition	research regarding sale issue	0.40	\$750.00	\$300.00
3/23/2025	Mark Desgrosseilliers	B130 Asset Disposition	Review NDA from Cerberus (.2); communications with Configure regarding same (.1)	0.30	\$850.00	\$255.00
3/24/2025	Daniel Egan	B130 Asset Disposition	prepare for sale hearing (2.2); conference call with buyer regarding same (.3); correspondence with working group regarding exhibits and witnesses for same (.4); correspondence with Verita and Configure regarding sale notices (.3); email correspondence with buyer and lender regarding sale and bidding procedures (.6)	3.80	\$750.00	\$2,850.00
3/24/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for bidding procedures hearing	0.70	\$850.00	\$595.00
3/24/2025	Renaë Fusco	B130 Asset Disposition	draft COC re cure amount motion (.5); run blackline of cure order (.2); efile COC (.1); upload order (.1)	0.90	\$350.00	\$315.00
3/25/2025	Daniel Egan	B130 Asset Disposition	prepare for bidding procedures and second day hearing (2.6); attend same (1.6); revise bidding procedures order and various exhibits (1.1); various correspondence with buyer and lender regarding same (.4); revise and finalize sale notice bidding procedures and publication notice for service (.6)	6.30	\$750.00	\$4,725.00
3/25/2025	Mark Desgrosseilliers	B130 Asset Disposition	Prepare for sale hearing	0.20	\$850.00	\$170.00
3/25/2025	Renaë Fusco	B130 Asset Disposition	draft COC re bid procedures order (.3); efile same (.2); upload order (.1); send COC to chambers (.1); update calendar w sale dates (.2); circulate signed bid procedures order (.1); coordinate service (.1)	1.10	\$350.00	\$385.00
3/25/2025	William Chipman	B130 Asset Disposition	Prepare for (.3) and attend second day hearing related to bidding procedures (2.2).	2.50	\$950.00	\$2,375.00
3/26/2025	Daniel Egan	B130 Asset Disposition	review publication notice (.1); correspondence with client and buyer regarding stalking horse credit bid statement (.3)	0.40	\$750.00	\$300.00
3/26/2025	Renaë Fusco	B130 Asset Disposition	efile assumption notice (.2); coordinate service of same (.1); circulate bid notice (.1)	0.40	\$350.00	\$140.00
3/27/2025	Daniel Egan	B130 Asset Disposition	revise proposed sale order	0.60	\$750.00	\$450.00
3/28/2025	Daniel Egan	B130 Asset Disposition	review sale documents regarding assets and liabilities (.4); revise schedules regarding same (.2)	0.60	\$750.00	\$450.00

3/28/2025	Renaë Fusco	B130 Asset Disposition	efile suppl assumption notice (.1); coordinate service of same (.1)	0.20	\$350.00	\$70.00
3/31/2025	Daniel Egan	B130 Asset Disposition	correspondence with client and Configure regarding bidding process (.3); analyze APA issues (.3)	0.60	\$750.00	\$450.00
<b>B130 Asset Disposition</b>				<b>65.00</b>		<b>\$46,820.00</b>
2/27/2025	Mark Desgrosseilliers	B140 Relief from Stay/Adequate Protection Proceedings	Review customer settlement and stay relief issues (.3); communications with counsel for customers (.2)	0.50	\$850.00	\$425.00
2/28/2025	Mark Desgrosseilliers	B140 Relief from Stay/Adequate Protection Proceedings	Review customer settlement and related stay relief request (.3); communications with customer counsel concerning same (.1)	0.40	\$850.00	\$340.00
3/7/2025	Robert Weber	B140 Relief from Stay/Adequate Protection Proceedings	review objection to utilities motion and demand for adequate protection	0.20	\$875.00	\$175.00
<b>B140 Relief from Stay/Adequate Protection Proceedings</b>				<b>1.10</b>		<b>\$940.00</b>
3/6/2025	Renaë Fusco	B150 Meetings of and Communications with Creditors	edit notice of commencement (.2); prepare index and binders of IDI docs (.8); draft Fanto PHV motion (.2)	1.20	\$350.00	\$420.00
3/10/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	various correspondence with creditors and client regarding case states and postpetition contract issues	0.60	\$750.00	\$450.00
3/10/2025	Renaë Fusco	B150 Meetings of and Communications with Creditors	revise notice of commencement (.4); efile same (.2); coordinate service of same (.1)	0.70	\$350.00	\$245.00
3/11/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	calls with landlord and vendors regarding claims	0.80	\$750.00	\$600.00
3/12/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	various correspondence with creditors regarding contracts and claim amounts	0.70	\$750.00	\$525.00
3/13/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	calls with creditors regarding claims and case status	0.80	\$750.00	\$600.00
3/14/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	calls with creditors regarding claims	0.60	\$750.00	\$450.00
3/21/2025	Daniel Egan	B150 Meetings of and Communications with Creditors	calls with creditors regarding sale and contract issues	0.70	\$750.00	\$525.00
3/31/2025	Renaë Fusco	B150 Meetings of and Communications with Creditors	correspondence with claims agent re 341 meeting (.2); prepare 341 binder for M Desgrosseilliers (.5)	0.70	\$350.00	\$245.00
<b>B150 Meetings of and Communications with Creditors</b>				<b>6.80</b>		<b>\$4,060.00</b>
2/28/2025	Aaron Bach	B160 Fee/Employment Applications	Draft CBCC retention application	2.30	\$400.00	\$920.00
2/28/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise administrative advisor application (.8); review and comment on retention application (.5)	1.30	\$750.00	\$975.00
2/28/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Chipman Brown retention application	0.40	\$850.00	\$340.00
3/1/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise BRG retention application	1.10	\$750.00	\$825.00
3/2/2025	Daniel Egan	B160 Fee/Employment Applications	review and comment on Configure retention application	0.80	\$750.00	\$600.00
3/2/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review application to retain Chipman Brown	0.40	\$850.00	\$340.00
3/3/2025	Aaron Bach	B160 Fee/Employment Applications	Draft/revise CBCC retention application order and notice	1.20	\$400.00	\$480.00
3/3/2025	Daniel Egan	B160 Fee/Employment Applications	review and revise retention applications	0.80	\$750.00	\$600.00
3/3/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review/revise Chipman Brown retention application (2.8); research regarding same (1.1)	3.90	\$850.00	\$3,315.00
3/3/2025	Renaë Fusco	B160 Fee/Employment Applications	draft Ellis declaration for CBCC retention app (.3); draft Ellis declaration for Ropes retention app (.3); draft notice re OCP motion (.1); draft notice re Configure retention app (.2); draft notice re Verita retention app (.2); draft notice re interim comp motion (.2)	1.30	\$350.00	\$455.00

3/4/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review CBCC retention application prior to filing same (1.2); review Ropes retention application prior to filing same (.4); review BRG application prior to filing same (.3); review Verita 327 application prior to filing same (.2); review Configure retention application prior to filing same (.3)	2.40	\$850.00	\$2,040.00
3/4/2025	Renae Fusco	B160 Fee/Employment Applications	finalize & efile CBCC retention app (.3); finalize & efile BRG retention app (.3); finalize & efile Configure retention app (.3); finalize & efile Verita retention app (.3); finalize & efile OCP motion (.3); finalize & efile interim comp motion (.3); coordinate service of same (.2); draft notice re Ropes retention app (.2); finalize & efile Ropes retention app (.2)	2.40	\$350.00	\$840.00
3/11/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review responses of US Trustee to CBCC retention application	0.40	\$850.00	\$340.00
3/13/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Respond to US Trustee objections to CBCC retention application	1.30	\$850.00	\$1,105.00
3/13/2025	Renae Fusco	B160 Fee/Employment Applications	draft COC re KCC retention app (.2); draft COC re CBCC retention order (.2); draft COC re BRG retention order (.2); draft COC re Configure retention order (.2); draft COC re OCP order (.2)	1.00	\$350.00	\$350.00
3/14/2025	Renae Fusco	B160 Fee/Employment Applications	draft COC re Ropes & Gray retention app (.2); draft COC re interim comp motion (.2)	0.40	\$350.00	\$140.00
3/17/2025	Daniel Egan	B160 Fee/Employment Applications	review revised order and responses on BRG retention application (.3); correspondence with UST and BRG regarding same (.1)	0.40	\$750.00	\$300.00
3/17/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review CBCC retention order (.2); resolve US Trustee objections to same (.4)	0.60	\$850.00	\$510.00
3/17/2025	Renae Fusco	B160 Fee/Employment Applications	draft supplemental declaration regarding CBCC retention app	0.70	\$350.00	\$245.00
3/18/2025	Aaron Bach	B160 Fee/Employment Applications	Draft BRG supplemental declaration	0.80	\$400.00	\$320.00
3/18/2025	Daniel Egan	B160 Fee/Employment Applications	calls with BRG and UST regarding retention application issues (.7); review and revise declaration regarding same (.8); email correspondence with BRG regarding same (.2)	1.70	\$750.00	\$1,275.00
3/18/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review US Trustee comments to BRG retention order and disclosures (.3); call regarding same with BRG (.3); call with US Trustee regarding same (.2); address Configure retention issues (.2); review CBCC engagement issues (.2); communication regarding same with US Trustee (.1)	1.30	\$850.00	\$1,105.00
3/19/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review CBCC Supplemental Declaration (.2); review revised order and certification of counsel regarding same (.2); review resolution of Ropes & Gray retention application (.3); review BRG declaration and resolution of US Trustee objections (.3); review Configure communications regarding US Trustee objections (.1)	1.10	\$850.00	\$935.00
3/19/2025	Renae Fusco	B160 Fee/Employment Applications	efile CBCC supplemental declaration ISO retention (.2); run blackline of interim comp order (.2); run blackline re OCP order (.2); run blackline of CBCC retention order (.2); run blackline of KCC order (.2); efile interim comp COC (.1); upload interim comp order (.1); efile KCC COC (.1); upload KCC order (.1); efile OCP COC (.1); upload OCP order (.1); efile CBCC COC (.1); upload CBCC order (.1)	1.80	\$350.00	\$630.00
3/20/2025	Renae Fusco	B160 Fee/Employment Applications	revise Configure order COC (.4); efile same (.2); upload order (.2)	0.80	\$350.00	\$280.00
3/21/2025	Daniel Egan	B160 Fee/Employment Applications	various correspondence with BRG and UST regarding retention order and declaration (.4); correspondence with R. Fusco and Ropes regarding retention documents (.3)	0.70	\$750.00	\$525.00
3/21/2025	Mark Desgrosseilliers	B160 Fee/Employment Applications	Review Ropes retention filings	0.30	\$850.00	\$255.00
3/21/2025	Renae Fusco	B160 Fee/Employment Applications	revise BRG order COC (.3); run blackline of BRG order (.1); efile supplemental BRG declaration (.2); coordinate service of BRG supplemental declaration (.1); efile BRG order COC (.2); upload BRG order (.1); efile Ropes supplemental declaration (.2); edit Ropes order COC (.1); efile Ropes order COC (.2); upload Ropes order (.1)	1.60	\$350.00	\$560.00
		<b>B160 Fee/Employment Applications</b>		<b>33.20</b>		<b>\$20,605.00</b>

2/26/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	revise contract and lease cure motion (1.0); correspondence with client and debtor advisors regarding same (.3)	1.30	\$750.00	\$975.00
2/26/2025	Renae Fusco	B185 Assumption/Rejection of Leases and Contracts	finalize & efile cure amount motion (.3); several emails with claims agent re service (.3)	0.60	\$350.00	\$210.00
3/10/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	review cure objection (.2); review lease agreement regarding same (.6); correspondence with client regarding same (.3)	1.10	\$750.00	\$825.00
3/10/2025	Mark Desgrosseilliers	B185 Assumption/Rejection of Leases and Contracts	Review Toyota leases and related requests	0.30	\$850.00	\$255.00
3/11/2025	Mark Desgrosseilliers	B185 Assumption/Rejection of Leases and Contracts	Review leased property issues	0.80	\$850.00	\$680.00
3/13/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	various correspondence with creditor and landlord regarding lease issues (.8); revise cure order (.2)	1.00	\$750.00	\$750.00
3/14/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	analyze contract and lease issues (.6); correspondence with client regarding same (.1)	0.70	\$750.00	\$525.00
3/16/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	correspondence with client and landlord regarding lease	0.30	\$750.00	\$225.00
3/17/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	correspondence with client regarding lease issues (.3); review leases regarding assignment issues (.4)	0.70	\$750.00	\$525.00
3/20/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	revise cure amount order (.5); correspondence with creditor and client regarding same (.3); call with landlord regarding lease (.3)	1.10	\$750.00	\$825.00
3/20/2025	Mark Desgrosseilliers	B185 Assumption/Rejection of Leases and Contracts	Review lease issues in connection with former foreclosure proceedings	0.20	\$850.00	\$170.00
3/21/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	calls with landlord and client regarding lease issues (.5); review ledger regarding same (.2)	0.70	\$750.00	\$525.00
3/24/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	calls with landlord and client regarding lease (.6); revise lease order (.2)	0.80	\$750.00	\$600.00
3/26/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	review and finalize assignment notice and contract and lease schedule	0.70	\$750.00	\$525.00
3/27/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	correspondence with contract counterparty regarding sale and assignment (.2); review contract regarding same (.2)	0.40	\$750.00	\$300.00
3/28/2025	Aaron Bach	B185 Assumption/Rejection of Leases and Contracts	Draft supplemental notice of assumption/assignment of contracts	1.00	\$400.00	\$400.00
3/28/2025	Aaron Bach	B185 Assumption/Rejection of Leases and Contracts	Communicate with D. Egan regarding supplemental notice of assumption or assignment of contracts/leases	0.10	\$400.00	\$40.00
3/28/2025	Daniel Egan	B185 Assumption/Rejection of Leases and Contracts	review contracts and leases regarding assignment issues (.6); correspondence with buyer and lessee regarding same (.3); review and revise supplemental assignment notice (.4)	1.30	\$750.00	\$975.00
<b>B185 Assumption/Rejection of Leases and Contracts</b>				<b>13.10</b>		<b>\$9,330.00</b>
2/26/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise first day pleadings for filing (1.2); various correspondence with client regarding filing issues (.8); conference call with client regarding next steps and first day hearing (.6); call with US Trustee regarding first day motions (.3); revise first day orders (.4); calls with lenders regarding same (.5); prepare for first day hearing (2.8)	6.60	\$750.00	\$4,950.00
2/26/2025	Robert Weber	B190 Other Contested Matters (excluding assumption/rejection motions)	review agreements with customer NGSC (.4); review and revise motion to approve settlement with customer NGSC (1.5)	1.90	\$875.00	\$1,662.50
2/27/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	prepare for first day hearing (3.3); conference calls with lenders regarding first day orders (.6); revise forms of orders (.3); attend first day hearing (2.7)	6.90	\$750.00	\$5,175.00

2/27/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	revise 9019 motion	0.20	\$350.00	\$70.00
2/27/2025	Robert Weber	B190 Other Contested Matters (excluding assumption/rejection motions)	continue to draft and revise motion to approve customer settlement	3.80	\$875.00	\$3,325.00
2/28/2025	Aaron Bach	B190 Other Contested Matters (excluding assumption/rejection motions)	Draft OCP motion	1.90	\$400.00	\$760.00
2/28/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise hearing notices	0.40	\$750.00	\$300.00
2/28/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	Revise motion to seal	0.80	\$350.00	\$280.00
2/28/2025	Robert Weber	B190 Other Contested Matters (excluding assumption/rejection motions)	revise 9019 motion and motion to file under seal	1.60	\$875.00	\$1,400.00
3/1/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise ordinary course professional motion	0.80	\$750.00	\$600.00
3/3/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and revise interim compensation procedures motion (.7); review and revise notices of hearing (.2)	0.90	\$750.00	\$675.00
3/3/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	email from/to M Desgrosseilliers re interim comp motion	0.10	\$350.00	\$35.00
3/4/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review and finalize second day motions	1.30	\$750.00	\$975.00
3/4/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	draft notice re motion to seal (.2); efile 9019 (redacted & sealed) (.4); efile motion to seal (.1); coordinate service of redacted version & motion to seal (.1); prep service of sealed motion (.1)	0.90	\$350.00	\$315.00
3/4/2025	Robert Weber	B190 Other Contested Matters (excluding assumption/rejection motions)	call with M. Desgrosseilliers regarding filing 9019 motion and term sheet under seal and related issues	0.30	\$875.00	\$262.50
3/7/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review utility objection (.3); call with client and BRG regarding same (.2); research regarding same (.4)	0.90	\$750.00	\$675.00
3/8/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review draft settlement agreement (.7); correspondence with client regarding same and creditor issues (.2)	0.90	\$750.00	\$675.00
3/11/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	review UST comment to second day pleadings (.8); research issues regarding same (.9); revise second day orders (.4)	2.10	\$750.00	\$1,575.00
3/12/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	revise second day orders (1.4); correspondence with client and UST regarding same (.3)	1.70	\$750.00	\$1,275.00
3/12/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	email with M Desgrosseilliers regarding sealed 9019 motion and declaration	0.20	\$350.00	\$70.00
3/13/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	further revise second day orders	0.40	\$750.00	\$300.00
3/14/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	draft COC re 9019 order	0.20	\$350.00	\$70.00
3/17/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	further revise second day orders	0.70	\$750.00	\$525.00
3/17/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	review issues for declaration in support of settlement	0.40	\$350.00	\$140.00
3/18/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	further revise proposed orders	0.30	\$750.00	\$225.00
3/20/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	calls with US Trustee regarding second day orders (.3); calls with BRG regarding same (.6); review and revise declaration (.5);	1.40	\$750.00	\$1,050.00
3/20/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	revise LM settlement agreement	0.20	\$350.00	\$70.00

3/20/2025	Renaë Fusco	B190 Other Contested Matters (excluding assumption/rejection motions)	finalize Ellis declaration (.1); efile same (.2); coordinate service of same (.1); edit 9019 COC (.1); efile 9019 COC (.2); upload 9019 order (.1)	0.80	\$350.00	\$280.00
3/21/2025	Daniel Egan	B190 Other Contested Matters (excluding assumption/rejection motions)	correspondence with client regarding second day orders (.2); correspondence with OCPs regarding declarations (.3)	0.50	\$750.00	\$375.00
			<b>B190 Other Contested Matters (excluding assumption/rejection motions)</b>	<b>39.10</b>		<b>\$28,090.00</b>
2/27/2025	Daniel Egan	B195 Non-Working Travel	travel to and from Wilmington for first day hearing	3.50	\$375.00	\$1,312.50
3/24/2025	Daniel Egan	B195 Non-Working Travel	travel to Wilmington for sale hearing	2.00	\$375.00	\$750.00
3/25/2025	Daniel Egan	B195 Non-Working Travel	travel to NYC from sale hearing	1.70	\$375.00	\$637.50
			<b>B195 Non-Working Travel (billed at 50% of rate)</b>	<b>7.20</b>		<b>\$2,700.00</b>
2/26/2025	Renaë Fusco	B210 Business Operations	calendar debtor interview	0.20	\$350.00	\$70.00
2/27/2025	Mark Desgrosseilliers	B210 Business Operations	Review Customer settlement and related MOUs (.6); communications with Customer counsel regarding same (.2)	0.80	\$850.00	\$680.00
2/28/2025	Daniel Egan	B210 Business Operations	revise vendor agreements (1.2); various correspondence with BRG regarding vendor issues (.5); correspondence with BRG and Verita regarding escrows (.2)	1.90	\$750.00	\$1,425.00
2/28/2025	Mark Desgrosseilliers	B210 Business Operations	Review critical vendor issues (.7); communications with client concerning same (.2)	0.90	\$850.00	\$765.00
2/28/2025	Renaë Fusco	B210 Business Operations	correspondence with client and UST re IDI	0.20	\$350.00	\$70.00
3/3/2025	Daniel Egan	B210 Business Operations	analyze employment issues (.3); correspondence with Hackler Flynn regarding same (.2)	0.50	\$750.00	\$375.00
3/3/2025	Mark Desgrosseilliers	B210 Business Operations	Review critical vendor proposed payments and agreements (.2); communications with client regarding same (.1); review customer issues (.4)	0.70	\$850.00	\$595.00
3/4/2025	Daniel Egan	B210 Business Operations	call with BRG regarding vendors (.5); review and revise vendor agreements (1.1); calls with vendor counsel regarding claims (.7); multiple calls with client regarding supplier and customer issues (.8)	3.10	\$750.00	\$2,325.00
3/4/2025	Mark Desgrosseilliers	B210 Business Operations	Review critical vendor payments (.2); review additional critical vendor budget needs (.2); review revised order and notice of same (.4); review Northrop Grumman settlement motion prior to filing same (1.3); communications with counsel for Northrop Grumman regarding same (.2); review motion to seal regarding same prior to filing (.6)	2.90	\$850.00	\$2,465.00
3/5/2025	Daniel Egan	B210 Business Operations	revise vendor agreements (.7); various correspondence with client and vendors regarding same (.5); review draft customer agreement (.6)	1.80	\$750.00	\$1,350.00
3/5/2025	Mark Desgrosseilliers	B210 Business Operations	Review critical vendor payments and related issues (.3); review Boeing proposed agreement (.3)	0.60	\$850.00	\$510.00
3/6/2025	Daniel Egan	B210 Business Operations	correspondence with client and creditors regarding contracts (.5); review vendor agreements (.2)	0.70	\$750.00	\$525.00
3/6/2025	Mark Desgrosseilliers	B210 Business Operations	Review potential agreement with Boeing (.4); communications with counsel for Boeing (.2)	0.60	\$850.00	\$510.00
3/7/2025	Daniel Egan	B210 Business Operations	review and comment on draft vendor agreements	0.80	\$750.00	\$600.00
3/7/2025	Mark Desgrosseilliers	B210 Business Operations	Review objection to utilities reserve (.1); address resolution of same (.2); communications with counsel for lender concerning same (.1)	0.40	\$850.00	\$340.00
3/7/2025	Mark Desgrosseilliers	B210 Business Operations	Review critical vendor payments and related matters (.4); review customer agreements (.7)	1.10	\$850.00	\$935.00
3/8/2025	Mark Desgrosseilliers	B210 Business Operations	Review utilities deposit demand and related issues	0.20	\$850.00	\$170.00
3/10/2025	Mark Desgrosseilliers	B210 Business Operations	Communication with client regarding critical vendor payments	0.20	\$850.00	\$170.00
3/11/2025	Daniel Egan	B210 Business Operations	review and revise vendor agreements (.5); correspondence with client and BRG regarding same (.4); analyze tax issue (.6)	1.50	\$750.00	\$1,125.00

Chipman Brown Cicero Cole LLP  
February 26, 2025 - March 31, 2025

Dynamic Aerostructures LLC  
Case No. 25-10292 (LSS)

Invoice No. 18152  
April 15, 2025

3/12/2025	Daniel Egan	B210 Business Operations	revise supplier agreements (1.2); correspondence with client and vendors regarding same (.3)	1.50	\$750.00	\$1,125.00
3/12/2025	Mark Desgrosseilliers	B210 Business Operations	Review agreements with customers including Northrop and Boeing (.7); discussion with Avem's counsel concerning customer agreements (.2); review utility demand and resolution of same (.2); review critical vendor agreements and correspondence concerning same (.3)	1.40	\$850.00	\$1,190.00
3/12/2025	Renaë Fusco	B210 Business Operations	email to M Desgrosseilliers regarding global notes (.1); calendar MOR filing deadline (.1)	0.20	\$350.00	\$70.00
3/12/2025	Renaë Fusco	B210 Business Operations	attend telephonic IDI meeting	0.60	\$350.00	\$210.00
3/13/2025	Daniel Egan	B210 Business Operations	calls with company and BRG regarding vendor issues (.7); review and revise contracts for same (.5)	1.20	\$750.00	\$900.00
3/13/2025	Mark Desgrosseilliers	B210 Business Operations	Review Boeing agreement (.6); communications with counsel for Avem regarding same (.1); communications with counsel for Boeing regarding same (.1); review NG settlement motion and US Trustee comments to same (.4); communications with counsel to NG regarding same (.2); prepare for hearing concerning same (.7)	2.10	\$850.00	\$1,785.00
3/13/2025	Renaë Fusco	B210 Business Operations	circulate Southern CA withdrawal of objection to utilities motion	0.10	\$350.00	\$35.00
3/14/2025	Mark Desgrosseilliers	B210 Business Operations	Review Lockheed settlement proposal	0.60	\$850.00	\$510.00
3/17/2025	Daniel Egan	B210 Business Operations	analyze contract and customer issues	0.60	\$750.00	\$450.00
3/17/2025	Mark Desgrosseilliers	B210 Business Operations	Review Northrup settlement motion (.4); prepare for hearing regarding same (1.2)	1.60	\$850.00	\$1,360.00
3/18/2025	Daniel Egan	B210 Business Operations	revise vendor agreements (.2); correspondence with client and vendor regarding same (.3)	0.50	\$750.00	\$375.00
3/19/2025	Daniel Egan	B210 Business Operations	revise vendor agreements (.4); correspondence with client and vendor regarding same (.3); correspondence with BRG and utility company regarding adequate assurance issues (.2)	0.90	\$750.00	\$675.00
3/19/2025	Mark Desgrosseilliers	B210 Business Operations	Review US Trustee objections to Northrop settlement motion (.2); review settlement motion (.2); communications with US Trustee and counsel for Northrop concerning same (.1); draft declaration concerning same (.2); review Lockheed stipulation (.4)	1.10	\$850.00	\$935.00
3/19/2025	Renaë Fusco	B210 Business Operations	draft CNO re insurance motion (.2); draft CNO re customer programs (.2); run blackline of critical vendor order (.2); call w D Egan re COC's (.1); draft COC re critical vendor order (.2); draft COC re utilities motion (.2); edit critical vendor COC (.1); re-run Critical Vendor blackline (.2); efile customer programs CNO (.1); upload customer programs order (.1); efile insurance CNO (.1); upload insurance order (.1); efile critical vendor COC (.1); upload critical vendor order (.1); efile utilities COC (.1); upload utilities order (.1)	2.20	\$350.00	\$770.00
3/20/2025	Daniel Egan	B210 Business Operations	calls with client and vendors regarding contracts and post-petition services and parts	0.60	\$750.00	\$450.00
3/20/2025	Mark Desgrosseilliers	B210 Business Operations	Review motion to seal NG settlement (.3); review NG settlement motion and order (.3); call with US Trustee and counsel for NG (.2); follow-up regarding same with NG's counsel (.1); follow-up regarding same with counsel for US Trustee (.1); review/revise Ellis Declaration in support of NG settlement (.6); prepare for hearing regarding same and motion to seal same (.8)	2.40	\$850.00	\$2,040.00
3/24/2025	Mark Desgrosseilliers	B210 Business Operations	Respond to counsel for Northrop Grumman regarding hearing	0.10	\$850.00	\$85.00
3/25/2025	Renaë Fusco	B210 Business Operations	finalize MOR's (.3); efile same (.2); coordinate service of same (.1)	0.60	\$350.00	\$210.00
3/26/2025	Renaë Fusco	B210 Business Operations	efile schedules and statements	0.70	\$350.00	\$245.00
3/28/2025	Daniel Egan	B210 Business Operations	call with client regarding vendors (.2); review insurance issues (.3)	0.50	\$750.00	\$375.00
		<b>B210 Business Operations</b>		<b>38.60</b>		<b>\$28,800.00</b>
3/19/2025	Renaë Fusco	B220 Employee Benefits/Pensions	draft CNO re wage motion (.2); efile same (.1); upload order (.1)	0.40	\$350.00	\$140.00

			<b>B220 Employee Benefits/Pensions</b>	<b>0.40</b>	<b>\$140.00</b>	<b>\$140.00</b>
2/26/2025	Daniel Egan	B230 Financing/Cash Collections	call with lenders regarding DIP financing issues (.7); review revise DIP financing order (.2)	0.90	\$750.00	\$675.00
2/26/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Continue to review/revise DIP Motion and related documents (1.4) address US Trustee comments (1.1); prepare for hearing on same (3.9); review lender comments to same (.9)	7.30	\$850.00	\$6,205.00
2/26/2025	Renaë Fusco	B230 Financing/Cash Collections	correspondence with M Desgrosseilliers and D Egan regarding interim and final cash management orders	0.10	\$350.00	\$35.00
2/27/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Prepare for hearing on DIP Motion (2.6); review/revise interim DIP Order (.9); communications with Lenders' counsel regarding same (.4); communications with US Trustee concerning same (.3); attend same (1.6); follow-up regarding same including review/revise proposed interim DIP Order (1.8); communications with Lenders' counsel regarding same (.4); communications with US Trustee regarding same (.1); communications with counsel for TRM regarding same (.1)	8.20	\$850.00	\$6,970.00
2/27/2025	Renaë Fusco	B230 Financing/Cash Collections	draft NOF revised interim DIP order (.2); draft NOF re revised cash management order (.2); run blackline of interim DIP order (.2); run blackline of cash management order (.2); efile NOF DIP order (.2); efile NOF cash management (.2); send NOF to Judge Silverstein chambers (.1); draft COC re DIP interim order (.2)	1.50	\$350.00	\$525.00
2/28/2025	Daniel Egan	B230 Financing/Cash Collections	review revised DIP order	0.40	\$750.00	\$300.00
2/28/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Continue to review proposed form of interim order (2.3); communication with Lenders' counsel regarding same (.6); communications with US Trustee concerning same (.4); prepare/draft certification of counsel regarding same (.3)	3.60	\$850.00	\$3,060.00
2/28/2025	Renaë Fusco	B230 Financing/Cash Collections	run blackline of interim DIP order (.2); finalize DIP interim order COC & efile same (.2); email to Judge Silverstein chambers attaching COC (.1); download & circulate interim DIP order	0.50	\$350.00	\$175.00
3/6/2025	Daniel Egan	B230 Financing/Cash Collections	calls with BRG regarding budget and creditor issues (.6); review DIP order regarding financing issues (.3)	0.90	\$750.00	\$675.00
3/7/2025	Daniel Egan	B230 Financing/Cash Collections	analyze DIP financing issues (.4); correspondence with client and Verita regarding adequate protection issues and adequate protection account (.3)	0.70	\$750.00	\$525.00
3/7/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review DIP order	0.30	\$850.00	\$255.00
3/10/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with client and Verita regarding adequate protection issues	0.30	\$750.00	\$225.00
3/10/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review final DIP Order and proposed changes from Lockheed (.1); communication with client concerning same (.1)	0.20	\$850.00	\$170.00
3/11/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review proposed DIP Order changes	0.70	\$850.00	\$595.00
3/12/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with client and lender regarding DIP loan issues	0.30	\$750.00	\$225.00
3/12/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review Proposed changes to final DIP Order (.4); communications with DIP Lender's counsel (.2); review letter from Bank of America (.1); communications with client regarding same (.2); communications with Bank of America concerning same (.3)	1.20	\$850.00	\$1,020.00
3/13/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review final DIP Order and proposed changes to same (.3); communications with DIP Lender regarding same (.2); prepare for final DIP hearing (.4); address customer issues in connection with final DIP (.5)	1.40	\$850.00	\$1,190.00
3/14/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Revise form of final DIP Order (1.2); prepare for hearing (.4)	1.60	\$850.00	\$1,360.00
3/14/2025	Renaë Fusco	B230 Financing/Cash Collections	emails from/to M Desgrosseilliers re interim DIP order	0.30	\$350.00	\$105.00
3/15/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with lender and client regarding financing issues	0.30	\$750.00	\$225.00
3/15/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review proposed final DIP Order (.3); communications with counsel for CRG (.1)	0.40	\$850.00	\$340.00
3/17/2025	Daniel Egan	B230 Financing/Cash Collections	call with lender regarding DIP budget (.7); review same and DIP order (.4)	1.10	\$750.00	\$825.00



Chipman Brown Cicero Cole LLP  
February 26, 2025 - March 31, 2025

Dynamic Aerostructures LLC  
Case No. 25-10292 (LSS)

Invoice No. 18152  
April 15, 2025

3/17/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review and revise draft final DIP Order (1.1); prepare for hearing regarding same (.6); call with client and CRG regarding budget matters (.6)	2.30	\$850.00	\$1,955.00
3/18/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review customer comments to final DIP Order (.4); communications with lenders' counsel (.2); review objections to final DIP Order (.4); communications with client regarding same (.2); review BMO/Avem issues with final DIP Order (.2); prepare for hearing on same (.4)	1.80	\$850.00	\$1,530.00
3/18/2025	Renae Fusco	B230 Financing/Cash Collections	correspondence with D. Egan and M. Desgrosseilliers regarding DIP objection	0.10	\$350.00	\$35.00
3/19/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review resolution of Mitsubishi objection to final form of DIP Order (.3); review customer resolutions including Lockheed (.4)	0.70	\$850.00	\$595.00
3/19/2025	Renae Fusco	B230 Financing/Cash Collections	draft cash management CNO (.2); draft NOF final DIP order (.2); efile NOF re DIP order (.1); coordinate service of same (.1); efile cash management CNO (.1); upload cash management order (.1)	0.80	\$350.00	\$280.00
3/20/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Revise form of final DIP order (1.6); communications with DIP Lender and Avem regarding final form of DIP Order (.3); communications with objecting parties regarding final DIP (.2); prepare for hearing concerning same (.6)	2.70	\$850.00	\$2,295.00
3/20/2025	Renae Fusco	B230 Financing/Cash Collections	draft COC re final DIP order	0.40	\$350.00	\$140.00
3/21/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review final form of DIP Order (.3); communications with commenting parties regarding same (.3); review certification of counsel concerning same (.4); prepare for hearing (.6)	1.60	\$850.00	\$1,360.00
3/21/2025	Renae Fusco	B230 Financing/Cash Collections	edit final DIP COC (.2); run blacklines of DIP orders (.3); efile DIP COC (.2); upload DIP order (.1)	0.80	\$350.00	\$280.00
3/24/2025	Daniel Egan	B230 Financing/Cash Collections	call with lender regarding variance report	0.20	\$750.00	\$150.00
3/24/2025	Mark Desgrosseilliers	B230 Financing/Cash Collections	Review sale DIP budget	0.20	\$850.00	\$170.00
3/25/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with lender and Verita regarding adequate protection reserve	0.20	\$750.00	\$150.00
3/27/2025	Daniel Egan	B230 Financing/Cash Collections	correspondence with client and BRG regarding DIP funds (.3); review variance report (.1)	0.40	\$750.00	\$300.00
		<b>B230 Financing/Cash Collections</b>		<b>44.40</b>		<b>\$34,920.00</b>
3/18/2025	Renae Fusco	B240 Tax Issues	draft CNO re tax motion	0.30	\$350.00	\$105.00
3/19/2025	Renae Fusco	B240 Tax Issues	revise tax order CNO (.1); efile same (.1); upload order (.1)	0.30	\$350.00	\$105.00
		<b>B240 Tax Issues</b>		<b>0.60</b>		<b>\$210.00</b>
		<b>Total Fees</b>		<b>299.30</b>		<b>\$203,800.00</b>

**EXHIBIT C****EXPENSE SUMMARY FOR THE PERIOD  
FEBRUARY 26, 2025 THROUGH AND INCLUDING MARCH 31, 2025**

<b>EXPENSE CATEGORY</b>	<b>SERVICE PROVIDER (IF APPLICABLE)</b>	<b>TOTAL EXPENSES</b>
E101 Copying	In-House	\$1,018.70
E102 Outside Printing	DLS Discovery/Reliable	\$2,621.77
E110 Out of Town Travel	Amtrak/Hotel Dupont	\$1,399.60
E111 Meals	Janssen's	\$323.50
E112 Court Fees	USBC/USDC	\$299.00
E115 Transcripts	Reliable	\$158.05
	<b>TOTAL:</b>	<b>\$5,820.62</b>

Date	Activity	Description	Quantity	Rate	Total
2/27/2025	E101 Copying	30 b/w copies re first day hearing	30.00	\$0.10	\$3.00
2/27/2025	E101 Copying	160 color copies re first day hearing	160.00	\$0.60	\$96.00
2/27/2025	E101 Copying	843 color copies re 1st day hearing prep	843.00	\$0.60	\$505.80
2/27/2025	E101 Copying	870 B/W copies re first day hearing prep	870.00	\$0.10	\$87.00
3/25/2025	E101 Copying	320 color copies re 3/25 hearing prep	438.00	\$0.60	\$262.80
3/25/2025	E101 Copying	160 b/w copies re 3/25 hearing prep	160.00	\$0.10	\$16.00
3/31/2025	E101 Copying	481 b/w copies re 341 hearing binder	481.00	\$0.10	\$48.10
		<b>E101 Copying</b>			<b>\$1,018.70</b>
2/28/2025	E102 Outside printing	DLS Discovery (Printing Services and Expedited Court Delivery [inv.#260652])	1.00	\$47.60	\$47.60
2/28/2025	E102 Outside printing	Reliable (Printing Services Duplicating Custom Tabbing Binding and Hand Delivery [inv.#WL122266])	1.00	\$521.85	\$521.85
3/6/2025	E102 Outside printing	Reliable (Printing Services Tabbing Binding Delivery [inv.#WL122439])	1.00	\$405.54	\$405.54
3/11/2025	E102 Outside printing	DLS Discovery (Printing Services Custom Tabbing Binding Court Delivery [inv.#264591])	1.00	\$1,646.78	\$1,646.78
		<b>E102 Outside printing</b>			<b>\$2,621.77</b>
3/3/2025	E110 Out of Town Travel	Amtrak Trip 02/27/2025 for D. Egan from NY to DE and return for Hearing	1.00	\$432.00	\$432.00
3/27/2025	E110 Out of Town Travel	Amtrak Trip March 23 2025 and returning March 24 2025 for D. Egan from NY to DE and return for Hearing	1.00	\$400.00	\$400.00
3/27/2025	E110 Out of Town Travel	The Hotel Dupont Overnight stay March 23 2025 for Mr. D. Egan.	1.00	\$567.60	\$567.60
		<b>E110 Out of Town Travel</b>			<b>\$1,399.60</b>
3/26/2025	E111 Meals	Breakfast and lunch from Janssen's for 3/26 hearing (for B. Butler M. Guill R. Keenan E. Ellis G. Galardi M. Fanto R. Fusco W. Chipman and D. Egan)	1.00	\$323.50	\$323.50
		<b>E111 Meals</b>			<b>\$323.50</b>
2/26/2025	E112 Court fees	USBC Fee - Sale Motion	1.00	\$199.00	\$199.00
2/26/2025	E112 Court fees	USDC pro hac fee - Daniel G. Egan	1.00	\$50.00	\$50.00
3/7/2025	E112 Court fees	USDC Fee: Fanto PHV fee	1.00	\$50.00	\$50.00
		<b>E112 Court fees</b>			<b>\$299.00</b>
2/27/2025	E115 Hearing transcripts	Reliable (transcript services [inv.#WL12231])	1.00	\$158.05	\$158.05
		<b>E115 Hearing transcripts</b>			<b>\$158.05</b>
		<b>Total Expenses</b>			<b>\$5,820.62</b>

**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)

**Objection Deadline: May 6, 2025 at 4:00 p.m. (ET)**

**NOTICE OF FIRST MONTHLY APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP, FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM FEBRUARY 26, 2025 THROUGH AND INCLUDING MARCH 31, 2025**

**PLEASE TAKE NOTICE** that on April 15, 2025, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the attached *First Monthly Application of Chipman Brown Cicero & Cole, LLP, for Compensation and Reimbursement of Expenses as Co-Counsel to the Debtors for the Period from February 26, 2025 Through and Including March 31, 2025* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Application, must be filed on or before **May 6, 2025, at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the Court, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must serve a copy of the response on the following parties so as to be received on or before the Objection Deadline:

- (i) co-counsel to the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036 (Attn: Gregg M. Galardi; email: gregg.galardi@ropesgray.com) and Chipman Brown Cicero & Cole LLP, 1313 N. Market Street, Suite 5400, Wilmington, DE 19801 (Attn: Mark L. Desgrosseilliers and Robert A. Weber; email: desgross@chipmanbrown.com and weber@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 to the DIP Lender, King & Spalding LLP, 1100 Louisiana St., Suite 4100, Houston, TX 77002 (Attn: Michael Fishel; email: mfishel@kslaw.com) and

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<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.

Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801 (Attn: Kenneth J. Enos; email: kenos@ycst.com); and

- (i) the United States Trustee for the District of Delaware, 844 N. King Street, Room 2207, Wilmington, Delaware 19801 Attn: Rosa Sierra-Fox; email: Rosa.Sierra-Fox@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 132] (“**Interim Compensation Order**”) if no objection to the Application is timely filed, served, and received by the Objection Deadline, CBCC may file a certificate of no objection (a “**CNO**”) with the Court with respect to the fees and expenses requested in the Application. Upon filing a CNO, the Debtors will be authorized and directed to pay CBCC, without need for further order of the Court, an amount equal to the lesser of (i) 80% of the fees and 100% of expenses requested in the Application or (ii) 80% of the fees and 100% of the expenses requested in the Application that are not subject to an objection.

Dated: April 15, 2025

**CHIPMAN BROWN CICERO & COLE, LLP**

/s/ Mark L. Desgrosseilliers

Robert A. Weber (No. 4013)  
Mark L. Desgrosseilliers (No. 4083)  
Hercules Plaza  
1313 North Market Street, Suite 5400  
Wilmington, Delaware 19801  
Telephone: (302) 295-0192  
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desgross@chipmanbrown.com

-and-

**CHIPMAN BROWN CICERO & COLE, LLP**

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

**ROPES & GRAY LLP**

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*Counsel to the Debtors and Debtors in Possession*