

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

*In re*

**WESCO AIRCRAFT HOLDINGS, INC.,  
*et al.*,<sup>1</sup>**

Debtors.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**SUPPLEMENTAL DECLARATION  
OF BRIAN E. CEJKA IN SUPPORT OF THE  
DEBTORS' APPLICATION FOR ENTRY OF AN  
ORDER AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF ALVAREZ & MARSAL NORTH  
AMERICA, LLC AS COUNSEL TO THE DEBTORS AND  
DEBTORS IN POSSESSION EFFECTIVE AS OF THE  
PETITION DATE**

**(RELATED TO DOCKET NO. 346)**

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<sup>1</sup> The Debtors operate under the trade name Incora and have previously used the trade names Wesco, Pattonair, Haas, and Adams Aviation. A complete list of the Debtors in these chapter 11 cases, with each one's federal tax identification number and the address of its principal office, is available on the website of the Debtors' noticing agent at <http://www.kcellc.net/incora/>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.



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I, Brian E. Cejka, under penalty of perjury, declare as follows:

1. I am a Managing Director with Alvarez & Marsal North America, LLC (together with employees of its professional service provider affiliates (all of which are wholly-owned by its parent company and employees), its wholly-owned subsidiaries and independent contractors, “**A&M**”), a restructuring advisory services firm with numerous offices throughout the country. I submit this declaration (this “**Supplemental Declaration**”) to supplement my prior declaration that has been submitted in connection with A&M’s retention in these chapter 11 cases. Unless otherwise stated herein, I have personal knowledge of the facts set forth herein or have been informed of such matters by professionals of A&M.

2. On June 1, 2023 (the “**Petition Date**”), Wesco Aircraft Holdings, Inc. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) commenced these cases by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “**Court**”).

3. On June 30, 2023, the Debtors filed the *Application for Entry of an Order Authorizing the Employment and Retention of Alvarez & Marsal North America, LLC as Restructuring Advisors to the Debtors and Debtors in Possession Effective as of the Petition Date* [Docket No. 346] (the “**Application**”) and attached thereto was my declaration in support of the Application (the “**Initial Declaration**”).

4. On July 27, 2023, the Court entered the *Order Authorizing the Employment and Retention of Alvarez & Marsal North America, LLC as Restructuring Advisors to the Debtors and Debtors in Possession Effective as of the Petition Date* [Docket No. 481].

5. I submit this Supplemental Declaration to disclose certain additional information that has become available to A&M since the filing of the Initial Declaration. Capitalized terms used herein and not otherwise defined have the respective meanings set forth in the Initial Declaration.

#### **ADDITIONAL POTENTIAL PARTIES IN INTEREST**

6. In connection with its proposed retention by the Debtors in these cases, A&M has undertaken an ongoing analysis to determine whether any material relevant facts or relationships have arisen or discovered. In connection therewith, it has come to A&M's attention that the entities identified on Schedule A hereto ("***New Parties***") are parties involved in the Debtors Chapter 11 cases who were not identified on Schedule A to the Prior Declaration. The New Parties together with the parties identified on Schedule A to the Prior Declaration are hereinafter referred to as the "***Potential Parties in Interest***".

7. Based on the Firm Procedures described in the Initial Declaration, the relationships with the New Parties are identified on Schedule B hereto.

8. Based on the results of its review, to the best of my knowledge, except as set forth herein or in the Initial Declaration, A&M does not have an active relationship with any of Potential Parties in Interest in matters relating to the Debtors' chapter 11 cases.

#### **ADDITIONAL DISCLOSURES**

9. A&M disclosed in the Initial Declaration, that it was initially engaged from October 2021 to April 2022 and then again beginning in January 2023. A&M's initial engagement letter was dated October 20, 2021, and included as parties comprising the definition of the "Company," Wesco Aircraft Holdings, Inc., Wolverine Top Holding Corporation ("***TopCo***"), Wolverine Intermediate Holding Corporation, Wolverine Intermediate Holding II Corporation and their collective subsidiaries. TopCo is owned by Platinum Capital Management ("***Platinum***"), one of the Potential Parties in Interest.

10. A&M never provided advice or support to TopCo or any entity above Wolverine Intermediate Holding Corp and its board of directors under the October 2021 engagement letter.

11. Leading up to the filing of the Application, A&M and the Debtors entered into the engagement letter attached to the Initial Declaration dated May 5, 2023, to reflect the scope of A&M's ongoing services. The May 2023 engagement letter did not include TopCo as a party. It expressly terminated the October 2021 engagement letter and referenced the fact that TopCo had been a party to that prior letter.

12. To the extent any information disclosed herein requires amendment or modification upon A&M's completion of further review or as additional party-in-interest information becomes available to it, a further supplemental declaration reflecting such amended or modified information will be submitted to the Court.

*[Remainder of page intentionally blank]*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: March 7, 2024  
Dallas, TX

Respectfully submitted,

/s/ Brian E. Cejka  
Brian E. Cejka  
Managing Director  
Alvarez & Marsal North America, LLC

**SCHEDULE A**

**NEW POTENTIAL PARTIES IN INTEREST**

**BONDHOLDERS**

ANGEL ISLAND CAPITAL  
MANAGEMENT, LLC

**CLAIMANT-FILED CLAIMS**

ACHILLES AEROSPACE PRODUCTS,  
INCORPORATED  
AL TECHNOLOGY, INC.  
AO PRECISION MANUFACTURING  
ARIZONA DEPARTMENT OF REVENUE  
B AND B SPECIALTIES LLC  
BLIND AND VISION REHABILITATION  
SERVICES OF PITTSBURGH  
CASTOLEUM CORPORATION D/B/A  
NOBLE PINE PRODUCTS COMPANY  
CDW Direct, LLC  
CES MACHINE PRODUCTS INC.  
COAST-LINE INTERNATIONAL  
DISTRIBUTORS LTD  
CONDO, INC.  
CONTROL SOLUTIONS INC.  
EIS LEGACY LLC  
HAUN WELDING SUPPLY INC  
J.T. EATON AND CO., INC.  
LANXESS CORPORATION  
LIPHATECH INC  
MID-CONTINENT INSTRUMENTS CO.,  
INC.  
NORMA PENNSYLVANIA, INC.  
NORTHWEST ISD  
RIDEOUT TOOL AND MACHINE INC.  
SPECIALTY POLYMERS AND  
SERVICES, INC.  
THE COUNTY OF DENTON, TEXAS,  
COLLECTING PROPERTY TAXES FOR  
ITSELF AND FOR THE CITY OF  
DENTON, TEXAS,  
THE JANKOVICH COMPANY, LLC  
THE SLABE MACHINE PRODUCTS LLC  
TRANSENE COMPANY, INC.  
W.W. GRAINGER, INC.

**CLAIMANT-SCHEDULE E/F PART 2,  
UNSECURED GUC**

3V FASTENERS  
A & A - THE INTERNATIONAL FORW  
AIR POWER INC.  
ALA ADVANCED LOGISTICS FOR  
AEROSPACE  
ALLFAST FASTNG SYS INC - BA  
CONSIGNMENT  
ALLIUM US HOLDING LLC  
AMPHENOL PCD  
ANILLO - MIN/MAX  
ARGO SPRING MFG. CO.  
ARLINGTON INT. AVIA., LLC-  
BA/CONSIGNMENT  
AUTOMOTIVE & INDUSTRIAL SUPPLY  
B & B SPECIALTIES INC.  
BAL SEAL ENGINEERING EUROPE BV  
BOEING DIST. SVC. - AERO. DIV -BA -  
VOI  
BOEING DIST. SVC. - CONSIGNMENT -  
BA  
CLARIANT CORPORATION  
CONDO INC  
DECLAN GRANT  
DOUGLASS INTERIOR PRODUCTS  
ENTEGRIS, INC.  
ERAQUIMICOS SA DE CV  
FMC CORPORATION  
FORTECH PRODUCTS MEXICO SA DE  
CV  
GREENE TWEED & COMPANY  
LIMITED  
GS AEROSPACE  
HISCO/DALLAS  
INDESTRUCTIBLE PAINT CO.  
INTERNATIONAL SEAL-SIMRIT  
KAMATICS CORPORATION  
KINTO UK LTD  
KIRKLEES METROPOLITAN COUNCIL  
KMG ELECTRONIC CHEMICALS, INC  
LANXESS SOLUTIONS US INC.  
LIPHATECH INC  
MAGNAFLUX DIVISION OF ILLINOIS  
TOOL WORK

MATERION ADVANCED CHEMICALS  
MAYDAY MANUFACTURING  
COMPANY  
MB AEROSPACE LTD  
MCGEAN ROHCO INC.  
MEGGITT POLYMERS AND  
COMPOSITES  
MSC INDUSTRIAL SUPPLY CO.  
NOBLE PINE PRODUCTS CO.  
NTN BEARING CORPORATION OF  
AMERICA  
PENN POWER GROUP  
RADIAL USA - TEMPE  
RANDOLPH PRODUCTS COMPANY  
SERVICIOS EQUIPOS Y PRODUCTOS  
ECOLOGICOS  
SOLUTIA UK LTD -T  
SUPERIOR AIR PARTS INC  
TEMPEST AERO GROUP  
TORAY ADVANCED COMPOSITES  
U.S. LUBRICANTS  
US TECHNOLOGIES SA DE CV  
VERSATILIDAD INDUSTRIAL DE  
SALTILLO SA  
VERYON  
VOSS INDUSTRIES INC  
WENCOR WEST INCORPORATED  
WEST COAST AEROSPACE  
ZESTRON AMERICA

**VENDORS**

ACCROFAB LIMITED  
GRUPO AMERICAN INDUSTRIES S

**DIRECTOR/OFFICERS**

FAWCETT, DAVE  
HERNANDEZ, MARK  
REDAN ADVISORS LLC  
WELLS, GARY

**UCC PROFESSIONALS**

MCDERMOTT WILL & EMERY LLP  
MORRISON & FOERSTER LLP  
PIPER SANDLER & CO.  
PROVINCE, LLC



**SCHEDULE B**

**KNOWN CONNECTIONS TO POTENTIAL PARTIES IN INTEREST IN  
UNRELATED MATTERS**

**Current and Former Clients of A&M and/or its Affiliates**<sup>2</sup>

Bal Seal Engineering Europe BV  
EIS Legacy LLC  
KMG Electronic Chemicals, Inc.  
Meggitt Polymers and Composites  
Piper Sandler & Co.  
W.W. Grainger, Inc.

**Significant Equity Holders of Current and Former A&M Clients**<sup>3</sup>

MSC Industrial Supply Co.

**Professionals & Advisors**<sup>4</sup>

McDermott Will & Emery LLP  
Morrison & Foerster LLP  
Piper Sandler & Co.  
Province, LLC

**Significant Joint Venture Partners**<sup>5</sup>

Lanxess Corporation

**A&M Vendors**<sup>6</sup>

CDW Direct, LLC  
McDermott Will & Emery LLP  
Morrison & Foerster LLP

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<sup>2</sup> A&M and/ or an affiliate is currently providing or has previously provided certain consulting or interim management services to these parties or their affiliates (or, with respect to those parties that are investment funds or trusts, to their portfolio or asset managers or their affiliates) in wholly unrelated matters.

<sup>3</sup> These parties or their affiliates (or, with respect to those parties that are investment funds or trusts, their portfolio or asset managers or other funds or trusts managed by such managers) are significant equity holders of clients or former clients of A&M or its affiliates in wholly unrelated matters.

<sup>4</sup> These professionals have represented clients in matters where A&M was also an advisor (or provided interim management services) to the same client. In certain cases, these professionals may have engaged A&M on behalf of such client.

<sup>5</sup> These parties or their affiliates are significant joint venture partners of other clients or former clients of A&M or its affiliates in wholly unrelated matters.

<sup>6</sup> These parties or their affiliates provide or have provided products, goods and/or services (including but not limited to legal representation) to A&M and/or its affiliates.