

**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.

**ARROW ELECTRONICS, INC.,**

Plaintiff,

v.

**WESCO AIRCRAFT HOLDINGS, INC., et al.,**

Defendants.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

Adv. No. 24-03010 (MI)

**Emergency relief has been requested. Relief is requested not later than 5:00 p.m. (Central Time) on April 17, 2024.**

**If you object to the relief requested or you believe that emergency consideration is not warranted, you must either appear at the hearing or file a written response prior to the hearing. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

**A hearing will be conducted on this matter on April 17, 2024 at [•]:00 a.m./p.m. (Central Time) in Courtroom 400, 4th Floor, 515 Rusk, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.**

**Audio communication will be by use of the Court’s dial-in facility. You may access the facility at 1 (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Isgur’s conference room number is 954554. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Isgur’s home page. The meeting code “Judge Isgur”. Click the settings icon in the upper right corner and enter your name under the personal information setting.**

**Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the “Electronic Appearance” link on Judge Isgur’s home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.**

<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.kccllc.net/Incora/>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.



**JOINT AGREED EMERGENCY MOTION TO DEFER PRETRIAL  
CONFERENCE AND SCHEDULING DEADLINES**

Wesco Aircraft Holdings, Inc., and its debtor affiliates, as debtors and debtors in possession (collectively, the “*Debtors*” or “*Incora*”) in the above-captioned chapter 11 cases (these “*Chapter 11 Cases*”) and Arrow Electronics, Inc. (“*Arrow*” and together with the Debtors, the “*Parties*”) file this Joint Agreed Emergency Motion to Defer Pretrial Conference and Scheduling Deadlines (the “*Motion*”) and would respectfully show this Court as follows:

1. On January 23, 2024, Arrow filed an adversary complaint (the “*Adversary Complaint*”) commencing the above-captioned adversary proceeding against the Debtors (the “*Adversary Proceeding*”).

2. On January 24, 2024, the Court signed its *Order Setting Rule 7016 Conference, Requiring Rule 7026 Meeting, Establishing Procedures for Discovery Disputes, and Emphasizing Applicability of Certain Federal Rules of Civil Procedure as Made Applicable to the Federal Rules of Bankruptcy Procedure* [Docket No. 4] (the “*Scheduling Order*”).

3. On March 25, 2024, the Court signed an *Order Granting Joint Agreed Emergency Motion to Defer Pretrial Conference and Scheduling Deadlines* [Docket No. 11] (the “*First Order Deferring Deadlines*”), which postponed the dates established in the Scheduling Order, including (i) the deadline to respond to the Adversary Complaint, (ii) the Rule 26(f)(3) Report, and (iii) the conduct of the Rule 7016 Pretrial Conference.

4. The Parties have continued to confer regarding the matters in this Adversary Proceeding. However, those discussions have been delayed due to an unforeseen emergency absence on the part of certain critical personnel on the plaintiff’s side. Accordingly, the Parties believe it is appropriate to further postpone the dates established in the Scheduling Order and deferred in the First Order Deferring Deadlines, including (i) the deadline to respond to the

Adversary Complaint, (ii) the Rule 26(f)(3) Report, and (iii) the conduct of the Rule 7016 Pretrial Conference. The parties have agreed to extend the answer deadline and Rule 26(f)(3) Report currently due April 15, 2024. Because of the imminent deadlines, the Parties request expedited consideration of this Motion.<sup>2</sup>

5. The Parties respectfully request an extension extended the deadline to respond to the Adversary Complaint to April 30, 2024, and for the Parties to submit the Rule 26(f)(3) report three days before the Pretrial Conference.

6. The Parties respectfully request that the Pretrial Conference currently set for May 1, 2024, at 10:00 a.m. CT be postponed until on or after May 15, 2024.

**WHEREFORE**, the Parties pray that this Court grant this Motion and for such other and further relief as the Court deems just and proper.

*[Remainder of page intentionally left blank]*

---

<sup>2</sup> See Section K of the Procedures for Complex Cases in the Southern District of Texas (Effective October 18, 2023).

Dated: April 15, 2024

Respectfully submitted,

/s/ Charles A. Beckham, Jr

Charles A. Beckham, Jr. (TX Bar No. 02016600)  
Patrick L. Hughes (TX Bar No. 10227300)  
Martha Wyrick (TX Bar No. 24101606)  
Re’Necia Sherald (TX Bar No. 24121543)  
HAYNES AND BOONE, LLP  
1221 McKinney Street, Suite 4000  
Houston, TX 77010  
Telephone: 1 (713) 547-2000  
Email: Charles.Beckham@HaynesBoone.com  
Patrick.Hughes@HaynesBoone.com  
Martha.Wyrick@HaynesBoone.com  
ReNecia.Sherald@HaynesBoone.com

- and -

Dennis F. Dunne (admitted *pro hac vice*)  
Samuel A. Khalil (admitted *pro hac vice*)  
Benjamin M. Schak (admitted *pro hac vice*)  
MILBANK LLP  
55 Hudson Yards  
New York, NY 10001  
Telephone: 1 (212) 530-5000  
Email: DDunne@Milbank.com  
SKhalil@Milbank.com  
BSchak@Milbank.com

*Counsel to the Debtors and  
Debtors in Possession*

- and -

/s/ Jeffrey M. Galen

Jeffrey M. Galen, Esq.  
GALEN & DAVIS LLP  
2945 Townsgate Road, Suite 200  
Westlake Village, CA 91361  
818-986-5685 Telephone  
818-986-1859 Facsimile

*Attorneys for Plaintiff, Arrow Electronics, Inc.*

### CERTIFICATE OF SERVICE

I certify that, on April 15, 2024, a true and correct copy of the foregoing document was served through the Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas and will be served as set forth in the Affidavit of Service to be filed by the Debtors' proposed noticing agent.

/s/ Charles A. Beckham, Jr  
Charles A. Beckham, Jr.

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

<p><i>In re</i> <b>WESCO AIRCRAFT HOLDINGS, INC., et al.,<sup>1</sup></b> Debtors.</p> <hr/> <p><b>ARROW ELECTRONICS, INC.,</b> Plaintiff,</p> <p>v.</p> <p><b>WESCO AIRCRAFT HOLDINGS, INC., et al.,</b> Defendants.</p>	<p>Case No. 23-90611 (MI) Chapter 11 (Jointly Administered)</p>  <p>Adv. No. 24-03010 (MI)</p>
---	--

**Emergency relief has been requested. Relief is requested not later than 5:00 p.m. (Central Time) on April 17, 2024.**

**If you object to the relief requested or you believe that emergency consideration is not warranted, you must either appear at the hearing or file a written response prior to the hearing. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

**A hearing will be conducted on this matter on April 17, 2024 at [•]:00 a.m./p.m. (Central Time) in Courtroom 400, 4th Floor, 515 Rusk, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.**

**Audio communication will be by use of the Court’s dial-in facility. You may access the facility at 1 (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Isgur’s conference room number is 954554. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Isgur’s home page. The meeting code “Judge Isgur”. Click the settings icon in the upper right corner and enter your name under the personal information setting.**

**Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the “Electronic Appearance” link on Judge Isgur’s home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.**

---

<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.kccllc.net/Incora/>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

**JOINT AGREED EMERGENCY MOTION TO DEFER PRETRIAL  
CONFERENCE AND SCHEDULING DEADLINES**

Wesco Aircraft Holdings, Inc., and its debtor affiliates, as debtors and debtors in possession (collectively, the “*Debtors*” or “*Incora*”) in the above-captioned chapter 11 cases (these “*Chapter 11 Cases*”) and Arrow Electronics, Inc. (“*Arrow*” and together with the Debtors, the “*Parties*”) file this Joint Agreed Emergency Motion to Defer Pretrial Conference and Scheduling Deadlines (the “*Motion*”) and would respectfully show this Court as follows:

1. On January 23, 2024, Arrow filed an adversary complaint (the “*Adversary Complaint*”) commencing the above-captioned adversary proceeding against the Debtors (the “*Adversary Proceeding*”).

2. On January 24, 2024, the Court signed its *Order Setting Rule 7016 Conference, Requiring Rule 7026 Meeting, Establishing Procedures for Discovery Disputes, and Emphasizing Applicability of Certain Federal Rules of Civil Procedure as Made Applicable to the Federal Rules of Bankruptcy Procedure* [Docket No. 4] (the “*Scheduling Order*”).

3. On March 25, 2024, the Court signed an *Order Granting Joint Agreed Emergency Motion to Defer Pretrial Conference and Scheduling Deadlines* [Docket No. 11] (the “*First Order Deferring Deadlines*”), which postponed the dates established in the Scheduling Order, including (i) the deadline to respond to the Adversary Complaint, (ii) the Rule 26(f)(3) Report, and (iii) the conduct of the Rule 7016 Pretrial Conference.

4. The Parties have continued to confer regarding the matters in this Adversary Proceeding. However, those discussions have been delayed due to an unforeseen emergency absence on the part of certain critical personnel on the plaintiff’s side. Accordingly, the Parties believe it is appropriate to further postpone the dates established in the Scheduling Order and deferred in the First Order Deferring Deadlines, including (i) the deadline to respond to the

Adversary Complaint, (ii) the Rule 26(f)(3) Report, and (iii) the conduct of the Rule 7016 Pretrial Conference. The parties have agreed to extend the answer deadline and Rule 26(f)(3) Report currently due April 15, 2024. Because of the imminent deadlines, the Parties request expedited consideration of this Motion.<sup>2</sup>

5. The Parties respectfully request an extension extended the deadline to respond to the Adversary Complaint to April 30, 2024, and for the Parties to submit the Rule 26(f)(3) report three days before the Pretrial Conference.

6. The Parties respectfully request that the Pretrial Conference currently set for May 1, 2024, at 10:00 a.m. CT be postponed until on or after May 15, 2024.

**WHEREFORE**, the Parties pray that this Court grant this Motion and for such other and further relief as the Court deems just and proper.

*[Remainder of page intentionally left blank]*

---

<sup>2</sup> See Section K of the Procedures for Complex Cases in the Southern District of Texas (Effective October 18, 2023).



Dated: April 15, 2024

Respectfully submitted,

/s/ Charles A. Beckham, Jr

Charles A. Beckham, Jr. (TX Bar No. 02016600)  
Patrick L. Hughes (TX Bar No. 10227300)  
Martha Wyrick (TX Bar No. 24101606)  
Re’Necia Sherald (TX Bar No. 24121543)  
HAYNES AND BOONE, LLP  
1221 McKinney Street, Suite 4000  
Houston, TX 77010  
Telephone: 1 (713) 547-2000  
Email: Charles.Beckham@HaynesBoone.com  
Patrick.Hughes@HaynesBoone.com  
Martha.Wyrick@HaynesBoone.com  
ReNecia.Sherald@HaynesBoone.com

- and -

Dennis F. Dunne (admitted *pro hac vice*)  
Samuel A. Khalil (admitted *pro hac vice*)  
Benjamin M. Schak (admitted *pro hac vice*)  
MILBANK LLP  
55 Hudson Yards  
New York, NY 10001  
Telephone: 1 (212) 530-5000  
Email: DDunne@Milbank.com  
SKhalil@Milbank.com  
BSchak@Milbank.com

*Counsel to the Debtors and  
Debtors in Possession*

- and -

/s/ Jeffrey M. Galen

Jeffrey M. Galen, Esq.  
GALEN & DAVIS LLP  
2945 Townsgate Road, Suite 200  
Westlake Village, CA 91361  
818-986-5685 Telephone  
818-986-1859 Facsimile

*Attorneys for Plaintiff, Arrow Electronics, Inc.*

### CERTIFICATE OF SERVICE

I certify that, on April 15, 2024, a true and correct copy of the foregoing document was served through the Electronic Case Filing system of the United States Bankruptcy Court for the Southern District of Texas and will be served as set forth in the Affidavit of Service to be filed by the Debtors' proposed noticing agent.

/s/ Charles A. Beckham, Jr  
Charles A. Beckham, Jr.

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

<p><i>In re</i> <b>WESCO AIRCRAFT HOLDINGS, INC., et al.,<sup>3</sup></b> Debtors.</p> <hr/> <p><b>ARROW ELECTRONICS, INC.,</b> Plaintiff,</p> <p>v. <b>WESCO AIRCRAFT HOLDINGS, INC., et al.,</b> Defendants.</p>	<p>Case No. 23-90611 (MI) Chapter 11 (Jointly Administered)</p>  <p>Adv. No. 24-03010 (MI)</p>
--	--

**ORDER GRANTING JOINT AGREED EMERGENCY MOTION TO DEFER  
PRETRIAL CONFERENCE AND SCHEDULING DEADLINES**

This matter came before the Court on the Joint Agreed Emergency Motion to Defer Pretrial Conference Scheduling Deadlines (the “*Motion*”) filed jointly by Wesco Aircraft Holdings, Inc. and its affiliated debtors and debtors-in-possession (collectively, the “*Debtors*” or “*Incora*”) and Arrow Electronics, Inc. (“*Arrow*” and together with the Debtors, the “*Parties*”) and it is appearing that there having been prior agreement of the Parties to defer the Pretrial Conference and extend the deadlines for the Debtors to answer the Adversary Complaint and for the Parties to file a Joint Pretrial Statement, and no objection to such relief made, the Court may grant the requested relief.

**THEREFORE, IT IS ORDERED** that the Motion is hereby granted as follows: (a) The Pretrial Conference is postponed until May \_\_\_\_, 2024 at \_\_\_\_ a.m./p.m. (prevailing Central

---

<sup>3</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.kccllc.net/Incora/>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

Time); (b) the deadline to answer or otherwise respond to the Complaint is April 30, 2024; and (c) the deadline to file the Rule 26(f)(3) report is three days before the Pretrial Conference.

Signed: \_\_\_\_\_, 2024

---

Marvin Isgur  
United States Bankruptcy Judge