

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

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**REORGANIZED DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING ON  
MAY 16, 2025, at 9:30 A.M. (CENTRAL TIME)**

The above-captioned reorganized debtor (the “*Reorganized Debtor*”<sup>2</sup> or “*Incora*” and, together with its affiliated former debtors and their successors, as applicable, the “*Reorganized Debtors*”) hereby file this *Reorganized Debtors' Witness and Exhibit List for Hearing on May 16, 2025, at 9:30 a.m. (Central Time)* (the “*Witness and Exhibit List*”) with respect to the matter set for hearing on **May 16, 2025, at 9:30 a.m. (Central Time)** (the “*Hearing*”) before the Honorable United States Bankruptcy Court Judge Marvin Isgur at the United States Bankruptcy Court for the Southern District of Texas, Houston Division, Courtroom 404, 515 Rusk Street, Houston, TX 77002 and respectfully designates the following potential witnesses and exhibits:

**WITNESSES**

1. Erin McKeighan, Managing Director, Alvarez & Marsal;
2. David Fawcett, Chief Commercial Officer, Incora;
3. Any witness designated by any other party; and

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

<sup>2</sup> A detailed description of the now-Reorganized Debtors and their businesses is set forth in the *Declaration of Raymond Carney in Support of Chapter 11 Petitions and First Day Motions* (the “*First Day Declaration*”) [Docket No. 13], filed with the Debtors’ voluntary petitions for relief filed under title 11 of the United States Code (the “*Bankruptcy Code*”), on June 1, 2023 (the “*Petition Date*”).



4. Any rebuttal or impeachment witnesses.

**EXHIBITS**

<b>Ex. No.</b>	<b>Description</b>	<b>Mkd.</b>	<b>Off.</b>	<b>Obj.</b>	<b>Adm.</b>	<b>Date</b>
1.	Airbus Canada Limited Partnership Proof of Claim #1429					
2.	Reorganized Debtors' Objection to Proof of Claim #1429 [Docket. No. 2765]					
3.	Kurtzman Carson Consultants LLC d/b/a Verita Global's Certificate of Service on the Reorganized Debtors' Objection to Proof of Claim #1429 [Docket No. 2785]					
4.	Certificate of No Response Regarding Reorganized Debtors' Objection to Proof of Claim #1429 [Docket. No. 2825]					
5.	Notice of Hearing at 9:30 a.m. (CT) on May 16, 2025 [Docket No. 2847]					

The Reorganized Debtors reserve the right to ask the Court to take judicial notice of pleadings, transcripts, and documents filed in or in connection with the Reorganized Debtors' Chapter 11 Cases; to offer rebuttal exhibits; and/or to offer any exhibit listed by any other party. The Reorganized Debtors further reserve the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. Designation of any exhibit above does not waive any objections the Reorganized Debtors may have to any exhibit offered by any other party including any exhibit listed on another party's exhibit list.

Dated: May 14, 2025

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 Reorganized Debtors*

**Certificate of Service**

I certify that on May 14, 2025, a true and correct copy of the foregoing document was served through the Electronic Case Filing System for 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 Reorganized Debtors' noticing agent.

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.

# EXHIBIT 1

**Fill in this information to identify the case:**

Debtor Wesco Aircraft EMEA, Ltd.

United States Bankruptcy Court for the: Southern District of Texas  
(State)

Case number 23-90705

## Official Form 410

## Proof of Claim

04/22

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

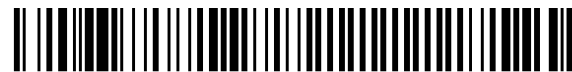
**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

**Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.**

**Part 1: Identify the Claim**

1. <b>Who is the current creditor?</b>	<u>Airbus Canada Limited Partnership</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor <u>Airbus Canada</u>	
2. <b>Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. <b>Where should notices and payments to the creditor be sent?</b>	<b>Where should notices to the creditor be sent?</b> Airbus Canada Limited Partnership Michael Leibov 13100 Boul. Henri-Fabre Mirabel, Quebec J7N 3C6, Canada  Contact phone <u>514-441-2645</u> Contact email <u>michael.leibov@airbus.com</u>	<b>Where should payments to the creditor be sent? (if different)</b> Airbus Canada Limited Partnership Accounts Receivable 13100 Boul. Henri Fabre Mirabel, Quebec J7N 3C6, Canada  Contact phone <u>514-441-2645</u> Contact email <u>michael.leibov@gmail.com</u>
	Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)  Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
4. <b>Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. <b>Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6.	<b>Do you have any number you use to identify the debtor?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____
7.	<b>How much is the claim?</b> \$ <u>850,000</u>	<b>Does this amount include interest or other charges?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8.	<b>What is the basis of the claim?</b> Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  <u>Contractual obligation</u>	
9.	<b>Is all or part of the claim secured?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature or property:</b> <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  <b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)  <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____  <b>Annual Interest Rate</b> (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10.	<b>Is this claim based on a lease?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of the petition.</b> \$ _____
11.	<b>Is this claim subject to a right of setoff?</b> <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Identify the property: <u>amounts payable under the Contract</u>	



## 12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No☐ Yes. Check all that apply:☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ \_\_\_\_\_

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

## 13. Is all or part of the claim pursuant to 11 U.S.C. § 503(b)(9)?

☒ No☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

## Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.☐ I am the creditor's attorney or authorized agent.☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/10/2023

MM / DD / YYYY

/s/Francis Lecomte

Signature

Print the name of the person who is completing and signing this claim:

Name

Francis Lecomte

First name

Middle name

Last name

Title

Vice President, Legal and Compliance and Corporate Secretary

Company

Airbus Canada Limited Partnership

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

Contact phone

Email





Case 23-90611 Document 2860-1 Filed in TXSB on 05/14/25 Page 5 of 14  
KCC ePOC Electronic Claim Filing Summary


For phone assistance: Domestic (888) 251-2937 | International (310) 751-2613

<b>Debtor:</b> 23-90705 - Wesco Aircraft EMEA, Ltd. <b>District:</b> Southern District of Texas, Houston Division		
<b>Creditor:</b> Airbus Canada Limited Partnership Michael Leibov 13100 Boul. Henri-Fabre  Mirabel, Quebec, J7N 3C6 Canada <b>Phone:</b> 514-441-2645 <b>Phone 2:</b>  <b>Fax:</b>  <b>Email:</b> michael.leibov@airbus.com	<b>Has Supporting Documentation:</b> Yes, supporting documentation successfully uploaded <b>Related Document Statement:</b>	
	<b>Has Related Claim:</b> No <b>Related Claim Filed By:</b>	
	<b>Filing Party:</b> Creditor	
<b>Disbursement/Notice Parties:</b> Airbus Canada Limited Partnership Accounts Receivable 13100 Boul. Henri Fabre  Mirabel, Quebec, J7N 3C6 Canada <b>Phone:</b> 514-441-2645 <b>Phone 2:</b>  <b>Fax:</b>  <b>E-mail:</b> michael.leibov@gmail.com <b>DISBURSEMENT ADDRESS</b>		
<b>Other Names Used with Debtor:</b> Airbus Canada	<b>Amends Claim:</b> No <b>Acquired Claim:</b> No	
<b>Basis of Claim:</b> Contractual obligation	<b>Last 4 Digits:</b> No	<b>Uniform Claim Identifier:</b>
<b>Total Amount of Claim:</b> 850,000	<b>Includes Interest or Charges:</b> No	
<b>Has Priority Claim:</b> No	<b>Priority Under:</b>	
<b>Has Secured Claim:</b> No <b>Amount of 503(b)(9):</b> No <b>Based on Lease:</b> No <b>Subject to Right of Setoff:</b> Yes, amounts payable under the Contract	<b>Nature of Secured Amount:</b> <b>Value of Property:</b>  <b>Annual Interest Rate:</b>  <b>Arrearage Amount:</b>  <b>Basis for Perfection:</b>  <b>Amount Unsecured:</b>	
<b>Submitted By:</b> Francis Lecomte on 10-Oct-2023 1:57:05 p.m. Eastern Time <b>Title:</b> Vice President, Legal and Compliance and Corporate Secretary <b>Company:</b> Airbus Canada Limited Partnership		

Fill in this information to identify the case:

Debtor 1 WESCO AIRCRAFT EMEA, LTD

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: Southern District of Texas 

Case number 23-90705

## Official Form 410

**Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor?	<u>Airbus Canada Limited Partnership</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor <u>Airbus Canada</u>	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>  <u>Airbus Canada LP c/o Michael Leibov</u> Name <u>13100 Boul. Henri-Fabre</u> Number Street <u>Mirabel</u> <u>QC</u> <u>J7N 3C6</u> City State ZIP Code Contact phone <u>514-441-2645</u> Contact email <u>michael.leibov@airbus.com</u>	<b>Where should payments to the creditor be sent? (if different)</b>  <u>Airbus Canada LP (accounts receivable/finance)</u> Name <u>13100 Boul. Henri Fabre</u> Number Street <u>Mirabel</u> <u>Qc</u> <u>J7N 3C6</u> City State ZIP Code Contact phone <u>514-441-2645</u> Contact email <u>michael.leibov@airbus.com</u>
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____	
	Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim?	\$ <u>850,000.00</u> . Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  <u>See Addendum Attached</u>
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property.  <b>Nature of property:</b> <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  <b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)  <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____  <b>Annual Interest Rate</b> (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Identify the property: <u>amounts payable under the contract</u>

**12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

**The person completing this proof of claim must sign and date it. FRBP 9011(b).**

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

**A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.**

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/06/2023

MM / DD / YYYY



Signature

**Print the name of the person who is completing and signing this claim:**

Name	Francis		Lecomte	
	First name	Middle name	Last name	
Title	Vice-President, Legal and Compliance and Corporate Secretary			
Company	Airbus Canada Limited Partnership			
	Identify the corporate servicer as the company if the authorized agent is a servicer.			
Address	13100	Boul. Henri-Fabre		
	Number	Street		
	Mirabel	Qc	J7N 3C6	
	City	State	ZIP Code	
Contact phone	514-502-7893		Email	francis.lecomte@airbus.com

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

In re:

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

**Debtors.**

Case No. 23-90705

Chapter 11

(Jointly Administered)

**ADDENDUM TO PROOF OF CLAIM OF  
AIRBUS CANADA LIMITED PARTNERSHIP**

Airbus Canada Limited Partnership (“**Claimant**”), by its authorized representative, hereby submits this proof of claim (this “**Claim**”) against Wesco Aircraft EMEA, Ltd. (“**Debtor**”).

**Background**

1. On June 1, 2023 (the “**Commencement Date**”), Debtor and certain of its affiliated entities filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (“**Bankruptcy Court**”), joining the above-captioned cases (the “**Chapter 11 Cases**”).

2. On September 11, 2023, the Bankruptcy Court entered an Order (I) Setting Bar Dates for Filing Proofs of Claim, (II) Approving the Form of Proofs of Claim and the Manner of Filing, (III) Approving Notice of Bar Dates, and (IV) Granting Related Relief (the “**Bar Date Order**”), which established, among other things, October 11, 2023, at 5:00 p.m. (CDT) as the bar date by which persons or entities holding claims that arose prior to the Commencement Date must file proofs of claim on account of such claims.

**The Claim**

3. The Debtor entered into a Procurement Frame Contract for the supply of standard aircraft parts on September 6, 2019 (the “**Supply Contract**”) with the parent company of the Claimant, Airbus S.A.S. The Supply Contract is governed by the laws of France.

4. The Debtor and Airbus SAS subsequently entered into Amendment No. 1 to the Supply Contract on January 1, 2021 (the “**Amendment**”), whereby the Claimant was added as a party (Purchaser) under the Supply Contract.

5. Pursuant to the Amendment, at Annex A9, the Debtor agreed that as a commercial consideration for the Claimant’s acceptance of more favorable payment terms, it obligated itself to issue a credit note to the Claimant in the amount of **EIGHT HUNDRED AND FIFTY THOUSAND U.S. DOLLARS (\$850,000 USD)** (the “**Credit Note**”). The Debtor was obligated to issue this Credit Note in three equal installments on January 15, 2021, June 15, 2021, and December 15, 2021.

6. During the 2021 calendar year and to this day, the Debtor failed to issues any part of the Credit Note, notwithstanding repeated requests by the Claimant.

7. Prior to the Commencement Date and continuing to the present day, the Claimant and the Debtor have been engaged in negotiations regarding a potential payment of the Credit Note in connection with an extension to the current Contract. As of the Commencement Date, however, such negotiations had not resulted in a finalized settlement or payment of such Credit Note.

8. In accordance with the Bar Date Order, Claimant asserts this claim against Debtor in an aggregate amount of not less than \$850,000 in respect of all amounts, liabilities, and obligations in favor of Claimant arising under the Supply Contract in relation to the Credit Note.

9. Claimant reserves the right to assert (i) any and all claims arising as a result of or in connection with Debtor's failure to comply with or perform any obligations in respect of the Supply Contract or upon any other breach thereof, including without limitation in connection with any assumption or rejection of the Supply Contract, and (ii) an administrative expense priority claim under sections 503(b) and 507(a) of the Bankruptcy Code in respect of any actions or obligations of the Debtor after the Commencement Date including, without limitation, for unpaid amounts owing in respect of the Supply Contract and post-petition interest accruing thereon.

10. This Claim is based upon the Supply Contract referenced above. Copies of the Supply Contract need not be annexed to this Claim because, with prior consent of Debtor's counsel, copies of the Supply Contract have been provided to Debtor's counsel concurrently with the filing of this Claim.

#### **Reservation of Rights**

11. Claimant does not waive, and expressly reserves, (i) all rights and remedies at law or in equity that Claimant has or may have against the Debtor, any of its affiliates and subsidiaries, or any other person or entity who may be liable for all or part of the Claim set forth herein; (ii) any obligation owed to Claimant or any right to any security that may be determined to be held by Claimant; (iii) Claimant's right to trial by jury, or a consent to trial by jury, in this or any other court; (iv) Claimant's right to have final orders in non-core matters, or core matters to which *Stern v. Marshall*, 564 U.S. 462 (2011) applies, entered only after *de novo* review by a

judge of the United States District Court; (v) any right to (a) seek to withdraw the reference or challenge the jurisdiction of the Bankruptcy Court with respect to the subject matter of the Claim, any objection thereto or any other proceeding commenced in these Chapter 11 Cases against or otherwise involving Claimant or (b) assert that the reference has already been withdrawn with respect to the subject matter of this Claim, any objection thereto or other proceeding commenced in these Chapter 11 Cases against or otherwise involving Claimant.

12. The filing of this Claim is not, nor shall it be deemed or construed to be: (i) a waiver or limitation of any procedural or substantive rights of Claimant or any procedural or substantive defenses to any claim that may be asserted against Claimant; (ii) an election of remedies or waiver of any past, present or future defaults or events of default; (iii) an admission by Claimant that any property held by the Debtor (or any subsidiaries or affiliates thereof) is property of the Debtor's bankruptcy estate; (iv) a waiver or release of, or any other limitation on, Claimant's right to assert that any portion of the Claim asserted herein or any other claims are entitled to priority, including, without limitation, under sections 503(b) and 507(a)(2) of the Bankruptcy Code; (v) a waiver of any right to claim specific assets; or (vi) a waiver or release of any lien or security interest. In addition, Claimant reserves the right to withdraw this Claim with respect to any of the claims set forth herein for any reason whatsoever.

13. Claimant expressly reserves the right to (i) amend, modify, update, or supplement this Claim at any time and in any respect, including, without limitation, as necessary or appropriate to amend, quantify, or correct amounts, to provide additional detail regarding the Claim set forth herein, to fix the amount of any disputed, contingent or unliquidated claim, or to assert any alternative theories or bases for recovery; (ii) file additional proofs of claim, administrative expense claims or requests for payment of any administrative expenses, or



pleadings for additional claims that may be based on the same or additional documents; and (iii) assert any and all other claims, actions, defenses, setoffs, recoupments, rights, right of action, causes of action, claims or remedies of whatever kind or nature that it currently has, or may have in the future against the Debtor and/or any of their respective affiliates and subsidiaries, or any other person or entity (including, without limitation, guarantors, partners, officers, directors, and other creditors of the Debtor), at law or in equity, including, without limitation, administrative or other priority claims, lien rights, interests, and the right to assert claims that are otherwise warranted in any related actions. This Claim is filed without prejudice to the filing by Claimant of additional proofs of claim or administrative expense claims with respect to any other liability or indebtedness of and/or equity interest in the Debtor.

14. Claimant does not waive or release any of their rights to amounts due for any claim asserted herein by not ascribing a specific dollar amount thereto at this time, and Claimant expressly reserves the right to amend or supplement this Claim if it deems it necessary or appropriate, to assert and state an amount for any such claim.

15. The Claim is not subject to objection, defense, setoff, recoupment, or counterclaim of any kind by the Debtor. Claimant expressly reserves and does not waive any objections, defenses, rights of set-off or recoupment, or counterclaims that it may possess. No judgment has been rendered on the Claim.

16. By filing this Claim, Claimant does not consent to or submit itself to the jurisdiction of the Bankruptcy Court for any purpose except in respect of the allowance of this Claim for any and all amounts due in connection therewith.

#### **Notices**

17. All notices, communications, and distributions in respect of this Claim should be delivered to:

Airbus Canada Limited Partnership  
Attn: Michael Leibov  
13100 Boul. Henri Fabre  
Mirabel, Quebec  
J7N 3C6, Canada

Email: [michael.leibov@airbus.com](mailto:michael.leibov@airbus.com)

# EXHIBIT 2

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

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**REORGANIZED DEBTORS'  
OBJECTION TO PROOF OF CLAIM #1429  
FILED BY AIRBUS CANADA LIMITED PARTNERSHIP**

**This is an objection to your claim. This objection asks the Court to disallow the claim that you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.**

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

The above-captioned reorganized debtor (the “*Reorganized Debtor*”<sup>2</sup> or “*Incora*” and, together with its affiliated former debtors and their successors, as applicable, the “*Reorganized Debtors*”) respectfully state as follows.

### RELIEF REQUESTED

1. By this objection (the “*Objection*”), Incora seeks entry of the proposed order (the “*Order*”), disallowing proof of claim number 1429 (the “*Claim*”) filed by Airbus Canada Limited Partnership.

2. The principal bases for this Objection are sections 105(a), 501(a), 502(a), and 502(b) of title 11 of the U.S. Code (the “*Bankruptcy Code*”), Rules 3001 and 3007 of the Federal Rules of Bankruptcy Procedures (the “*Bankruptcy Rules*”), and Rules 3007-1 and 9013-1 of the Bankruptcy Local Rules of the U.S. Bankruptcy Court for the Southern District of Texas (the “*Local Rules*”), and the Court’s *Order Approving Claim Objection and Settlement Procedures* [Dkt. No. 1354] (the “*Claims Procedures Order*”). This Objection is supported by the *Declaration of Christopher Kelly in Support of the Reorganized Debtors’ Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership* (the “*Kelly Declaration*”), attached to this Objection as **Exhibit A**.

3. If the claimant files and properly serves a timely response to this Objection, Incora will request the Court to schedule a hearing on that response.

### JURISDICTION AND VENUE

4. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. This Motion is a core proceeding under 28 U.S.C. § 157(b). Venue in the Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

<sup>2</sup> A detailed description of the now-Reorganized Debtors and their businesses is set forth in the *Declaration of Raymond Carney in Support of Chapter 11 Petitions and First Day Motions* (the “*First Day Declaration*”) [Dkt. No. 13], filed with the Debtors’ voluntary petitions for relief filed under title 11 of the United States Code (the “*Bankruptcy Code*”), on June 1, 2023 (the “*Petition Date*”).

## BASIS FOR RELIEF

5. Section 501(a) of the Bankruptcy Code provides, in pertinent part, that “[a] claim or interest, proof of which is filed under § 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502. Section 502(b)(1) provides that a court shall not allow a claim if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.” See 11 U.S.C. § 502(b)(1).

6. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes prima facie evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of prima facie validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

7. As set forth herein and in the Kelly Declaration, the Reorganized Debtors and their advisors have determined that there is no longer any liability owed in connection with the Claim. The proof of claim asserts a basis of a contractual obligation related to a credit note. The Reorganized Debtors and the claimant have engaged in negotiations and have since resolved the contractual obligations as it relates to the credit note. As such, there is no further outstanding liability related to the claimant’s assertion in the proof of claim form. However, the claimant has not responded to the Reorganized Debtors’ request that the claimant withdraw the Claim in light of the consensus that the credit note is no longer outstanding.

8. Accordingly, the Reorganized Debtors seek to disallow the Claim in its entirety.

## RESERVATION OF RIGHTS

9. Incora reserves the right to modify, supplement, or amend this Objection as it pertains to any portion of the Claim. Nothing in this Objection shall be understood as (a) an admission as to the validity of any claim against any of the Reorganized Debtors, (b) a waiver of the right of the Reorganized Debtors to dispute any claim against any of the Reorganized Debtors on any grounds whatsoever at a later date, (c) a promise by any of the Reorganized Debtors to pay any claim, or (d) a waiver of any rights of the Reorganized Debtors under the Bankruptcy Code or other applicable law.

## NOTICE

10. Pursuant to Article XII.C of the *Further Modified Second Amended Joint Chapter 11 Plan of Wesco Aircraft Holdings, Inc.* [D.I. 2517] (the “**Plan**”),<sup>3</sup> the Claims Procedures Order, and Rule 3007 of the Bankruptcy Rules, notice of this Objection will be provided (a) by filing on the Court’s Electronic Court Filing system, (b) by mail, to the Office of the U.S. Trustee, and (c) by email, to counsel to the General Unsecured Claims Observer, the First Lien Noteholder Group, and those parties that, following the Effective Date, have filed renewed requests for notices pursuant to Bankruptcy Rule 2002, and this Objection will be served on the claimant. The Reorganized Debtors respectfully submit that no further notice is required under the circumstances.

*[Remainder of page intentionally blank]*

<sup>3</sup> Capitalized terms used but not defined in this Objection have the meanings ascribed to them in the Plan.

Upon the foregoing Objection, the Reorganized Debtors respectfully request that the Court

(a) enter an order sustaining this Objection, substantially in the form attached to this Objection and

(b) grant such other relief as is just and proper.

Dated: April 4, 2025

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 Reorganized Debtor*



### **CERTIFICATE OF SERVICE**

I certify that, on April 4, 2025, 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 Reorganized Debtors' noticing agent.

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.

**EXHIBIT A**  
**TO THE REORGANIZED DEBTORS’**  
**OBJECTION TO PROOF OF CLAIM #1429**  
**FILED BY AIRBUS CANADA LIMITED PARTNERSHIP**  
**CHRISTOPHER KELLY DECLARATION**

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

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**DECLARATION OF CHRISTOPHER  
KELLY IN SUPPORT OF THE REORGANIZED  
DEBTORS' OBJECTION TO PROOF OF CLAIM #1429  
FILED BY AIRBUS CANADA LIMITED PARTNERSHIP**

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

I, Christopher Kelly, make this declaration pursuant to 28 U.S.C. § 1746 and state as follows:

### **BACKGROUND**

1. I am a Managing Director with Alvarez & Marsal North America, LLC (together with its wholly-owned subsidiaries and independent contractors and also with employees of its professional service provider affiliates, all of which are wholly-owned by its parent company and employees, “**A&M**”), a restructuring advisory services firm with multiple offices throughout the country. Since 1983, A&M has been a global provider of turnaround advisory services to companies in crisis or those in need of performance improvement in specific financial and operational areas. A&M’s debtor advisory services have encompassed a wide range of activities targeted at stabilizing and improving a company’s financial position, including developing and validating forecasts and business plans; monitoring and managing cash, cash flow, and supplier relationships; assessing and recommending cost reduction strategies; and designing and negotiating financial restructuring packages.

2. I received a Bachelor’s Degree in Commerce from the McIntire School of Commerce at the University of Virginia and a Masters of Business Administration from Columbia University. I have more than 17 years of restructuring experience. I specialize in the development, evaluation and execution of restructuring plans; cash flow forecasting and liquidity management; and operational performance improvement. I have assisted clients across a variety of industries, including financial services, government contracting, transportation and logistics, manufacturing, business services, and retail and apparel.

3. In addition to acting as the financial advisor to the Reorganized Debtors in these cases, some of my other most notable publicly disclosed restructuring assignments include Anna Holdings Inc. (Acosta), Arcapita Investments, Intelsat S.A., and Lehman Brothers Holdings Inc.

4. I am a senior member of the A&M team advising the Reorganized Debtors. I have worked closely with the Reorganized Debtors’ management and other professionals with respect to the Reorganized Debtors’ restructuring efforts, including assisting the Reorganized

Debtors in preparing cash flow projections, budgets, and other financial information. I am generally familiar with the Reorganized Debtors' day-to-day operations, financing arrangements, business affairs, and accounting records that reflect, among other things, the Reorganized Debtors' liabilities and the amount thereof owed to their creditors as of the Petition Date. I have read the *Reorganized Debtors' Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership* (the "**Objection**"),<sup>2</sup> and exhibits attached thereto and I submit this declaration in support thereof.<sup>3</sup>

5. To the best of my knowledge, information, and belief, and after investigation and review, the assertions made in the Objection are accurate.

### **CLAIM #1429 FILED BY AIRBUS CANADA LIMITED PARTNERSHIP**

6. I do not believe the Reorganized Debtors are liable for the Claim. Following a thorough review of the Reorganized Debtors' accounting records, the claims register, and the Claim, the Reorganized Debtors and their advisors have determined that there is no longer any liability owed in connection with the Claim. The proof of claim asserts a basis of a contractual obligation related to a credit note. The Reorganized Debtors and the claimant have engaged in negotiations and have since resolved the contractual obligations as it relates to the credit note. As such, there is no further outstanding liability related to the claimant's assertion in the proof of claim form.

7. For the foregoing reasons, I believe that disallowance of the Claim is appropriate.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Objection.

<sup>3</sup> Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at A&M and are based on information provided by them.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: April 4, 2025

/s/ Christopher Kelly

Christopher Kelly

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

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**ORDER SUSTAINING THE REORGANIZED  
DEBTORS' OBJECTION TO PROOF OF CLAIM #1429  
FILED BY AIRBUS CANADA LIMITED PARTNERSHIP**

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

Upon the *Reorganized Debtors' Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership* (the “**Objection**”);<sup>2</sup> and the Court having jurisdiction to decide the Objection and to enter this Order pursuant to 28 U.S.C. § 1334; and consideration of the Objection being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, such notice being adequate and appropriate under the circumstances; and after notice and a hearing, as defined in section 102 of the Bankruptcy Code; and the Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Order; and it appearing that entry of this Order is in the best interests of the Reorganized Debtors’ estates; it is hereby **ORDERED** that:

1. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on the merits.

2. The claim filed as proof of claim #1429 as filed by Airbus Canada Limited Partnership (the “**Claim**”) is disallowed in its entirety for all purposes in these chapter 11 cases.

3. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, the terms of this Order shall be immediately effective and enforceable upon its entry.

4. The Reorganized Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Order, which shall include an update of the claims register to reflect the relief granted by this Order.

5. Except as provided in this Order, nothing in this Order shall be deemed (a) a finding as to the validity of any claim against any of the Reorganized Debtors, (b) a waiver of the right of the Reorganized Debtors to dispute any claim against any of the Reorganized Debtors on any grounds whatsoever at a later date, (c) a requirement for any of the Reorganized Debtors to pay any claim, or (d) a waiver of any rights of the Reorganized Debtors under the Bankruptcy Code or other applicable law.

<sup>2</sup> Capitalized terms used but not defined in this Order have the meanings ascribed to them in the Objection.



6. The Court retains exclusive jurisdiction over all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: \_\_\_\_\_  
Houston, Texas

\_\_\_\_\_  
MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

# EXHIBIT 3

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

*In re*

**WESCO AIRCRAFT HOLDINGS, INC.,**<sup>1</sup>  
Reorganized Debtor.

Chapter 11

Case No. 23-90611 (MI)

**CERTIFICATE OF SERVICE**

I, Mikayla Cleary, depose and say that I am employed by Kurtzman Carson Consultants LLC dba Verita Global (“Verita”), the claims and noticing agent for the Debtor in the above-captioned case.

On April 4, 2025, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**:

- **Reorganized Debtors’ Objection to Proof of Claim #665 Filed by Andi Group Trucking Inc.** [Docket No. 2760]
- **Reorganized Debtors’ Objection to Proof of Claim #995 Filed by Briner Oil Co.** [Docket No. 2761]
- **Reorganized Debtors’ Objection to Proof of Claim #1080 Filed by Henmal S.C. Pytel Henry i Michalina** [Docket No. 2762]
- **Reorganized Debtors’ Objection to Proof of Claim #1267 Filed by ACE American Insurance Company** [Docket No. 2763]
- **Reorganized Debtors’ Objection to Proof of Claim #1325 Filed by Promotora y Distribuidora Farum SA de CV** [Docket No. 2764]
- **Reorganized Debtors’ Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership** [Docket No. 2765]
- **Reorganized Debtors’ Objection to Proof of Claim #1908 Filed by OneStream Software LLC** [Docket No. 2766]

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.



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- **Reorganized Debtors' Objection to Proof of Claim #1935 Filed by MCE Chemicals & Equipment Co. [Docket No. 2767]**
- **Reorganized Debtors' Objection to Proof of Claim #1992 Filed by Gastops Ltd. [Docket No. 2768]**
- **Reorganized Debtors' Objection to Proof of Claim #2069 Filed by Department of Treasury - Internal Revenue Service [Docket No. 2769]**
- **Reorganized Debtors' Objection to Proof of Claim #718 Filed by Kelly Freeman [Docket No. 2770]**

Furthermore, on April 4, 2025, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit B**; and via First Class Mail upon the service list attached hereto as **Exhibit C**. Applicable documents were served to each party as indicated on the attached exhibits. Individuals were served the following documents via Electronic Mail and First Class Mail but have been redacted from disclosure on this certificate of service.

- **Reorganized Debtors' Objection to Proof of Claim #665 Filed by Andi Group Trucking Inc. [Docket No. 2760]**
- **Reorganized Debtors' Objection to Proof of Claim #995 Filed by Briner Oil Co. [Docket No. 2761]**
- **Reorganized Debtors' Objection to Proof of Claim #1080 Filed by Henmal S.C. Pytel Henryk i Michalina [Docket No. 2762]**
- **Reorganized Debtors' Objection to Proof of Claim #1267 Filed by ACE American Insurance Company [Docket No. 2763]**
- **Reorganized Debtors' Objection to Proof of Claim #1325 Filed by Promotora y Distribuidora Farum SA de CV [Docket No. 2764]**
- **Reorganized Debtors' Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership [Docket No. 2765]**
- **Reorganized Debtors' Objection to Proof of Claim #1908 Filed by OneStream Software LLC [Docket No. 2766]**
- **Reorganized Debtors' Objection to Proof of Claim #1935 Filed by MCE Chemicals & Equipment Co. [Docket No. 2767]**
- **Reorganized Debtors' Objection to Proof of Claim #1992 Filed by Gastops Ltd. [Docket No. 2768]**

- **Reorganized Debtors' Objection to Proof of Claim #2069 Filed by Department of Treasury - Internal Revenue Service [Docket No. 2769]**
- **Reorganized Debtors' Objection to Proof of Claim #718 Filed by Kelly Freeman [Docket No. 2770]**

Dated: April 11, 2025

/s/ Mikayla Cleary

Mikayla Cleary

Verita

222 N Pacific Coast Highway,

3<sup>rd</sup> Floor

El Segundo, CA 90245

Tel 310.823.9000

## **Exhibit A**

## Exhibit A

Master Service List  
Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
Counsel for Rolls-Royce plc, Rolls-Royce Deutschland & Co KG, and Rolls-Royce Singapore (Pte) Ltd	Barnes & Thornburg LLP	Jonathan D. Sundheimer	jsundheimer@btlaw.com
Counsel for GKN, Rolls-Royce plc, Rolls-Royce Deutschland & Co KG, and Rolls-Royce Singapore (Pte) Ltd	Barnes & Thornburg LLP	Thomas Haskins	thomas.haskins@btlaw.com
Counsel for Thomas A. Pitta as General Unsecured Claims Observer	Emmet, Marvin & Martin, LLP	Thomas A. Pitta, Esq.	tpitta@emmetmarvin.com
Office of the U.S. Trustee for the Southern District of Texas	US Trustee for the Southern District of Texas (Houston Division)	Jayson B. Ruff, Christopher R. Travis, Hector Duran, and Andrew Jimenez	Jayson.B.Ruff@usdoj.gov; C.Ross.Travis@usdoj.gov; Hector.Duran.Jr@usdoj.gov; andrew.jimenez@usdoj.gov

## **Exhibit B**



**Affected Claimants Service List  
Served via Electronic Mail**

Document Served	CreditorName	CreditorNoticeName	Email
Docket No. 2763	ACE American Insurance Company on its Own Behalf and on Behalf of All of the Chubb Companies	Attn Wendy M. Simkulak, Esq.	WMSimkulak@duanemorris.com
Docket No. 2765	AIRBUS CANADA LIMITED PARTNERSHIP	Accounts Receivable	michael.leibov@gmail.com
Docket No. 2765	AIRBUS CANADA LIMITED PARTNERSHIP	Attn Michael Leibov	michael.leibov@airbus.com
Docket No. 2760	Andi Group Trucking Inc		andigroupclaims@gmail.com
Docket No. 2769	Department of Treasury - Internal Revenue Service	Internal Revenue Service	jordan.a.bowman@irs.gov
Docket No. 2768	GASTOPS LTD		mjovanovic@gastops.com
Docket No. 2770	Lubrication Engineers	Kelly Freeman	k.freeman@le-inc.com
Docket No. 2770	Lubrication Engineers	Kirsten Ratliff	arpayments@le-inc.com
Docket No. 2767	MCE CHEMICALS & EQUIPMENT CO.		orders.mce@gmail.com
Docket No. 2766	OneStream Software LLC	Attn Collection, Stephen L. Tupper	stupper@onestreamsoftware.com
Docket No. 2766	OneStream Software LLC	General Counsel	stupper@tupperfirm.com
Docket No. 2764	Promotora y Distribuidora Farum SA DE CV	Maria Norma Ruiz Mosqueda	gerardo.ruiz@wesser.mx; wesser.admon@wesser.mx

## Exhibit C

Affected Claimants Service List  
Served via First Class Mail

Document Served	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip	Country
Docket No. 2763	ACE American Insurance Company on its Own Behalf and on Behalf of All of the Chubb Companies	Attn Wendy M. Simkulak, Esq.	Duane Morris LLP	30 S. 17th Street	Philadelphia	PA	19103	
Docket No. 2763	ACE American Insurance Company on its Own Behalf and on Behalf of All of the Chubb Companies	Chubb	Adrienne Logan	436 Walnut Street	Philadelphia	PA	19106	
Docket No. 2765	AIRBUS CANADA LIMITED PARTNERSHIP	Accounts Receivable	13100 Boul. Henri Fabre		Mirabel	QC	J7N 3C6	Canada
Docket No. 2765	AIRBUS CANADA LIMITED PARTNERSHIP	Attn Michael Leibov	13100 HENRI-FABRE BOULEVARD		MIRABEL	QC	J7N 3C6	CANADA
Docket No. 2760	Andi Group Trucking Inc		13760 Buena Vista		Detroit	MI	48227	
Docket No. 2761	BRINER OIL CO.		325 BECK ST.	P.O. BOX 9	JONESVILLE	MI	49250	
Docket No. 2769	Department of Treasury - Internal Revenue Service	Internal Revenue Service	PO Box 7346		Philadelphia	PA	19101-7346	
Docket No. 2769	Department of Treasury - Internal Revenue Service	Internal Revenue Service	1919 Smith Street, M/S 5024 HOU		Houston	TX	77002	
Docket No. 2768	GASTOPS LTD		1011 POLYTEK ST		OTTAWA	ON	K1J 9J3	CANADA
Docket No. 2770	Lubrication Engineers	Kelly Freeman	1919 East Tulsa		Wichita	KS	67216	
Docket No. 2770	Lubrication Engineers	Kirsten Ratliff	PO Box 16025		Wichita	KS	67216	
Docket No. 2767	MCE CHEMICALS & EQUIPMENT CO.		100 SARATOGA VILLAGE BLVD.	SUITE 22A	MALTA	NY	12020	
Docket No. 2766	OneStream Software LLC	Attn Collection, Stephen L. Tupper	362 South Street		Rochester	MI	48307	
Docket No. 2766	OneStream Software LLC	General Counsel	191 Chester Street		Birmingham	MI	48009	
Docket No. 2764	Promotora y Distribuidora Farum SA DE CV	Maria Norma Ruiz Mosqueda	Av. Paseo De Los Alamos 1001 Col. Del Bosque		Celaya	Guanajuato	38085	Mexico

# EXHIBIT 4

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

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**CERTIFICATE OF NO RESPONSE  
REGARDING DEBTORS' OBJECTION TO PROOF OF  
CLAIM #1429**

**(RELATED TO DOCKET NO. 2765)**

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

1. Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned reorganized debtor (the “**Reorganized Debtor**”<sup>2</sup> or “**Incora**” and, together with its affiliated former debtors and their successors, as applicable, the “**Reorganized Debtors**”) certify as follows:

2. On April 4, 2025, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to Proof of Claim #1429* [Docket No. 2765] (the “**Objection**”)<sup>3</sup> which set forth the grounds for the Objection in addition to the supporting evidence in the Declaration of Christopher Kelly, Managing Director with Alvarez & Marsal North America, LLC, filed at Docket No. 2765-1. Attached to the Objection at Docket Number 2765-2 was a proposed form of order sustaining the Objection (the “**Proposed Order**”).

3. On April 4, 2025, the Reorganized Debtors’ Claims and Noticing Agent, Kurtzman Carson Consultants LLC d/b/a Verita Global (“**Verita**”) served the Objection via electronic mail on the parties registered to receive notice through the Court’s ECF system and electronic and First-Class mail on the affected claimant whose claim is the subject of the Objection. On April 12, 2025, Verita filed the certificate of service at Docket No. 2785 reflecting the aforementioned service efforts (the “**Certificate of Service**”).<sup>4</sup>

4. Pursuant to paragraph two of the Court’s *Order Approving Claim Objection and Settlement Procedures* [Docket No. 1354], responses were required to be filed on or prior to May 4, 2025 (the “**Response Deadline**”).<sup>5</sup>

<sup>2</sup> A detailed description of the now-Reorganized Debtors and their businesses is set forth in the *Declaration of Raymond Carney in Support of Chapter 11 Petitions and First Day Motions* (the “**First Day Declaration**”) [Docket No. 13], filed with the Debtors’ voluntary petitions for relief filed under title 11 of the United States Code (the “**Bankruptcy Code**”), on June 1, 2023 (the “**Petition Date**”).

<sup>3</sup> Capitalized terms used here but not otherwise defined shall have the meaning ascribed to them in the Objection.

<sup>4</sup> On May 6, 2025, Verita filed an amended certificate of service at Docket No. 2817.

<sup>5</sup> Pursuant to Bankruptcy Rule 9006(f), the Response Deadline for Parties served via first class mail April 7, 2025. Such deadline has passed. The Reorganized Debtors and their counsel have confirmed, upon review of the official docket in these Chapter 11 Cases, that there is no response to the Objection as of the date hereof.

5. In accordance with paragraph 44 of the Complex Case Procedures, the undersigned counsel files this Certificate of No Response and represents to the Court that: (a) the Response Deadline has passed; (b) the undersigned counsel is unaware of any unresolved response to the Objection; and (c) the undersigned counsel has reviewed the Court's docket and no response to the Objection appears thereon.

6. The Debtors respectfully request entry of the Proposed Order attached hereto and initially filed at Docket No. 2765-2.

Dated: May 8, 2025

Respectfully submitted,

/s/ Charles A. Beckham, Jr.

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*Counsel to the Reorganized Debtors*

### **CERTIFICATE OF SERVICE**

I certify that, on May 8, 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 Reorganized Debtors' 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**

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**ORDER SUSTAINING THE REORGANIZED  
DEBTORS' OBJECTION TO PROOF OF CLAIM #1429  
FILED BY AIRBUS CANADA LIMITED PARTNERSHIP**

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

Upon the *Reorganized Debtors' Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership* (the “**Objection**”);<sup>2</sup> and the Court having jurisdiction to decide the Objection and to enter this Order pursuant to 28 U.S.C. § 1334; and consideration of the Objection being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, such notice being adequate and appropriate under the circumstances; and after notice and a hearing, as defined in section 102 of the Bankruptcy Code; and the Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Order; and it appearing that entry of this Order is in the best interests of the Reorganized Debtors' estates; it is hereby **ORDERED** that:

1. Any response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on the merits.

2. The claim filed as proof of claim #1429 as filed by Airbus Canada Limited Partnership (the “**Claim**”) is disallowed in its entirety for all purposes in these chapter 11 cases.

3. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, the terms of this Order shall be immediately effective and enforceable upon its entry.

4. The Reorganized Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Order, which shall include an update of the claims register to reflect the relief granted by this Order.

5. Except as provided in this Order, nothing in this Order shall be deemed (a) a finding as to the validity of any claim against any of the Reorganized Debtors, (b) a waiver of the right of the Reorganized Debtors to dispute any claim against any of the Reorganized Debtors on any grounds whatsoever at a later date, (c) a requirement for any of the Reorganized Debtors to pay any claim, or (d) a waiver of any rights of the Reorganized Debtors under the Bankruptcy Code or other applicable law.

<sup>2</sup> Capitalized terms used but not defined in this Order have the meanings ascribed to them in the Objection.

6. The Court retains exclusive jurisdiction over all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: \_\_\_\_\_  
Houston, Texas

\_\_\_\_\_  
MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE

# EXHIBIT 5

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

*In re*

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

Reorganized Debtor.

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

**NOTICE OF HEARING AT 9:30 A.M. (CT) ON MAY 16,  
2025**

**(RELATED TO DOCKET NOS. 2765 AND 2825)**

<sup>1</sup> The captioned Reorganized Debtor is Incora Intermediate II LLC, the successor by merger to Wesco Aircraft Holdings, Inc. Its employer identification number is 33-2921953. Its principal office address and service address in this case is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

**PLEASE TAKE NOTICE THAT** on April 4, 2025, the above-captioned reorganized debtor (the “**Reorganized Debtor**”<sup>2</sup> or “**Incora**” and, together with its affiliated former debtors and their successors, as applicable, the “**Reorganized Debtors**”) filed the *Reorganized Debtors’ Objection to Proof of Claim #1429 Filed by Airbus Canada Limited Partnership* [Docket No. 2765] (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE THAT** on May 8, 2025, the Reorganized Debtors filed the Certificate of No Response Regarding Debtors’ Objection to Proof of Claim #1429 [Docket No. 2825] (the “**Certificate of No Response**”)

**PLEASE TAKE FURTHER NOTICE THAT** a hybrid in-person and virtual hearing on the Certificate of No Response will be held on **May 16, 2025, at 9:30 a.m. (Central Time)**, before the Honorable Marvin Isgur, at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 404, 515 Rusk, Houston, TX 77002 (the “**Hearing**”).

**PLEASE TAKE FURTHER NOTICE THAT** parties may appear at the Hearing in-person or by remote participation. For those parties who wish to participate remotely, the 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 (<https://www.txs.uscourts.gov/content/united-states-bankruptcy-judge-marvin-igsur>). The meeting code is “JudgeIsgur”. Click the settings icon in the upper right corner and enter your name under the personal information setting.

**PLEASE TAKE FURTHER NOTICE THAT** 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 homepage at <https://www.txs.uscourts.gov/content/united-states-bankruptcy-judge-marvin-igsur>. Select the case name, complete the required fields, and click “Submit” to complete your appearance.

**PLEASE TAKE FURTHER NOTICE THAT** copies of the Objection, Certificate of No Response, and all other documents filed in these Chapter 11 Cases are available free of charge by visiting the Reorganized Debtors’ restructuring website at <https://veritaglobal.net/incora>. You may also obtain copies of any documents filed in these Chapter 11 Cases for a fee via PACER at <http://www.txs.uscourts.gov>.

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<sup>2</sup> A detailed description of the now-Reorganized Debtors and their businesses is set forth in the *Declaration of Raymond Carney in Support of Chapter 11 Petitions and First Day Motions* (the “**First Day Declaration**”) [Docket No. 13], filed with the Debtors’ voluntary petitions for relief filed under title 11 of the United States Code (the “**Bankruptcy Code**”), on June 1, 2023 (the “**Petition Date**”).

Dated: May 12, 2025

/s/ Charles A. Beckham, Jr.

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*Counsel to the Reorganized Debtors*

**If you have any questions related to this notice, please call (888) 251-2937 (U.S./Canada) or +1 (310) 751-2613 (International) or visit <https://veritaglobal.net/incora>.**

### **CERTIFICATE OF SERVICE**

I certify that, on May 12, 2025, 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 Reorganized Debtors' noticing agent.

/s/ Charles A. Beckham, Jr.

Charles A. Beckham, Jr.