

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF DELAWARE**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS, INC., et al.,	:	Case No. 21-10670 (KBO)
	:	
Debtors.¹	:	Jointly Administered
	:	
	:	Obj. Deadline: April 4, 2024 at 4:00 p.m. (ET)
	:	Hearing Date: April 23, 2024 at 2:00 pm (ET)
-----	X	

**MOTION OF LIQUIDATION TRUST FOR ENTRY OF
 A FINAL DECREE (I) CLOSING CHAPTER 11 CASES AND
 (II) TERMINATING OFFICIAL CLAIMS AGENT SERVICES**

The Liquidation Trust,² as the representative of the Debtors’ estates pursuant to the Plan, hereby files this motion (the “**Motion**”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), pursuant to section 350(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 3022 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rule 3022-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), (i) closing the above captioned chapter 11 cases (the “**Chapter 11 Cases**”), and (ii) terminating the claims and noticing services (the “**Official Claims Agent Services**”) provided by Kurtzman Carson Consultants, LLC (“**KCC**”). In support of this motion, the Liquidation Trust respectfully represents as follows:

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: TECT Aerospace Group Holdings, Inc. (9338); TECT Aerospace Kansas Holdings, LLC (4241); TECT Aerospace Holdings, LLC (9112); TECT Aerospace Wellington Inc. (4768); TECT Aerospace, LLC (8650); TECT Hypervelocity, Inc. (8103); and Sun Country Holdings, LLC (6079). The Debtors’ mailing address is TECT Aerospace Group Holdings, Inc., c/o Riveron RTS, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Plan (as defined below).



JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Pursuant to Local Rule 9013-1(f), the Liquidation Trust consents to the entry of a final order by the Court in connection with this Motion to the extent it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

A. General Background

3. On April 5, 2021, the Debtors commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors were authorized to continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner was appointed in these Chapter 11 Cases. On April 20, 2021, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**Committee**”). *See* D.I. 76.³

4. The Debtors’ Chapter 11 Cases are being jointly administered for procedural purposes pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

³ On the Effective Date (as defined below), except for certain limited purposes that are not relevant to this Motion, the Committee dissolved. Plan § XI.A.

5. Additional information regarding the Debtors' businesses, capital structures, the circumstances leading to the commencement of these Chapter 11 Cases and the Chapter 11 Cases are set forth in the *Declaration of Shaun Martin in Support of Chapter 11 Petitions and First Day Pleadings* [D.I. 13] and the Disclosure Statement, which are incorporated herein by reference.

B. Background and Notable Case Events Relevant to this Motion

6. On April 7, 2021, the Court entered the *Order Authorizing the Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date* [D.I. 29] (the "**KCC Retention Order**"), authorizing the retention of KCC as the Debtors' claims and noticing agent to provide the Official Claims Agent Services.

7. On March 8, 2022, the Court entered the *Findings of Fact, Conclusions of Law and Order Confirming Chapter 11 Plan of Liquidation* [D.I. 812] (the "**Confirmation Order**"), confirming the *Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors* [D.I. 790] (the "**Plan**"). The Plan provided that the Liquidation Trust would be formed on the Effective Date for the purposes of "(1) liquidating the Liquidation Trust Assets; (2) reviewing, objecting to, and resolving all Disputed Claims, including Disputed Class 5 Claims but excluding Disputed Class 4 Claims; (3) making distributions to Holders of Allowed Claims, other than Holders of Allowed General Unsecured Claims in accordance with the terms of the Plan; and (4) otherwise implementing the Plan." Plan § IV.F.1.a. Pursuant to the Plan, "[t]he Liquidation Trust and the Liquidation Trustee will each be a 'representative' of the Estates under section 1123(b)(3)(B) of the Bankruptcy Code." *Id.* at § IV.F.1.f. In addition, pursuant to the Plan, on the Effective Date, the GUC Distribution Trust (together with the Liquidation Trust, collectively, the "**Trusts**") was also formed to, among other things, reconcile Class 4 Claims and make distributions to the Holders of Allowed Class 4 Claims. *See id.* at § IV.G.1.a.

8. The Plan became effective on March 11, 2022 (the “**Effective Date**”). *See* D.I. 822.

9. On June 13, 2022, the Court entered the *Omnibus Order Awarding Final Allowance of Compensation for Services Rendered and Reimbursement of Expenses* [D.I. 940] (the “**Final Fee Order**”), awarding final allowance of compensation for services rendered and for reimbursement of expenses for the Debtors’ professionals.

10. Since the Effective Date, the Trusts have been diligently carrying out their duties under the Plan and respectfully submit that closing the Chapter 11 Cases is appropriate for the following reasons. *First*, all distributions that were required to be made pursuant to the Plan have been made or will be made in accordance with the terms of the Plan or by agreement of the parties. *Second*, all expenses arising from the administration of the Debtors’ estates and the Chapter 11 Cases, including, without limitation, court fees, quarterly fees owed under 28 U.S.C. § 1930(a)(6) (the “**Section 1930 Fees**”), professional fees, and expenses, have been paid or will be paid as and when such fees and expenses come due. *Third*, all motions, contested matters, and other proceedings that were before this Court with respect to the Chapter 11 Cases have been resolved, dismissed, or withdrawn. After the Chapter 11 Cases are closed, the Liquidation Trust will take all action necessary to dissolve or terminate the existence of the Non-Debtor Subsidiaries under applicable law. Accordingly, the Trusts believe that substantially all of their duties under the Plan and in these Chapter 11 Cases have been completed, or will be completed as and when required under the Plan, and the Liquidation Trust respectfully submits that closing the Chapter 11 Cases is necessary and appropriate for those reasons set forth herein.

BASIS FOR RELIEF REQUESTED

A. Final Decree Closing the Chapter 11 Cases

11. Pursuant to section 350(a) of the Bankruptcy Code, Bankruptcy Rule 3022, and Local Rule 3022-1, the Liquidation Trust seeks entry of an order closing the Chapter 11 Cases.

12. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022. Local Rule 3022-1(a) provides that, “[u]pon written motion, a party in interest may seek the entry of a final decree at any time after the confirmed plan has been fully administered provided that all required fees due under 28 U.S.C. § 1930 have been paid.” Del. Bankr. L.R. 3022-1(a).

13. The term “fully administered” is not defined in either the Bankruptcy Code or the Bankruptcy Rules. The Advisory Committee Note to the 1991 amendments to Bankruptcy Rule 3022 (the “**Advisory Committee Note**”), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- (a) whether the order confirming the plan has become final;
- (b) whether deposits required by the plan have been distributed;
- (c) whether the property proposed by the plan to be transferred has been transferred;
- (d) whether the debtor or the successor to the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- (e) whether payments under the plan have commenced; and

- (f) whether all motions, contested matters, and adversary proceedings have been finally resolved.

Advisory Committee Note.

14. Bankruptcy courts in this District have adopted the view that “these factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, No. 02-12608, 2005 WL 1668396, at *2 (Bankr. D. Del. June 24, 2005) (citing *In re Mold Makers, Inc.*, 124 B.R. 766, 768 (Bankr. N.D. Ill. 1990)); *see also In re Ginko Assocs., L.P.*, No. 05-19436, 2009 WL 2916917, at *2 (Bankr. E.D. Pa. June 25, 2009) (stating Bankruptcy Rule 3022 “is intended to allow bankruptcy courts flexibility in determining whether an estate is fully administered,” and not all factors need to be present before closing a case) (quoting *In re Federated Dep’t Stores, Inc.*, 43 F. App’x 820, 822 (6th Cir. 2002)); *In re Kliegl Bros. Universal Elec. Stage Lighting Co., Inc.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999) (recognizing that bankruptcy courts weigh the factors contained in the Advisory Committee Note when deciding whether to close a case); *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 538-39 (Bankr. E.D. Ky. 1997) (same).

15. In addition to the factors set forth in the Advisory Committee Note, courts have considered whether the plan has been substantially consummated. *See In re Motors Liquidation Co.*, 625 B.R. 605, 615 (Bankr. S.D.N.Y. 2021) (stating that courts consider substantial consummation as a factor) (citations omitted); *see also In re Gates Cmty. Chapel of Rochester, Inc.*, 212 B.R. 220, 224 (Bankr. W.D.N.Y. 1997) (considering substantial consummation as a factor in determining whether to close a case).

16. The Advisory Committee Note also indicates that the entry of a final decree “should not be delayed solely because the payments required by the plan have not been completed,” and the Court “should not keep the case open only because of the possibility that the court’s jurisdiction

may be invoked in the future.” Advisory Committee Note. Additionally, “a final decree closing the case after the estate is fully administered does not deprive the court of jurisdiction to enforce or interpret its own orders and does not prevent the court from reopening the case for cause pursuant to § 350(b) of the [Bankruptcy] Code.” *Id.*

17. Indeed, Bankruptcy Rule 3022 was amended in order to:

set forth a flexible Rule to permit the court to determine that an estate is fully administered and should be closed even though payments or other activities involving the debtor and its creditors might continue. . . . As is evident by the Committee note, the Advisory Committee interprets “fully administered” very loosely and encourages courts to use substantially more discretion in deciding whether to close a [c]hapter 11 case th[a]n Code § 350 and the Rule literally read.

In re Gould, 437 B.R. 34, 37-38 (Bankr. D. Conn. 2010) (emphasis added) (citation omitted).

18. As of the date hereof, the Chapter 11 Cases have been “fully administered” within the meaning of section 350 of the Bankruptcy Code, making it appropriate for the Court to enter a final decree closing the Chapter 11 Cases. Among other things:

- a) the Confirmation Order has become final and is non-appealable;
- b) all property and Causes of Action of the Debtors and any property acquired by the Debtors under the Plan vested in the Liquidation Trust and the GUC Distribution Trust, as applicable;
- c) the transactions contemplated by the Plan have been consummated;
- d) the claims reconciliation process has been completed or will be completed before the hearing scheduled for April 23, 2024;
- e) substantially all of the distributions provided for under the Plan have been made and any remaining distributions will be made in accordance with the terms of the Plan or by agreement of the parties;
- f) the Final Fee Order has been entered; and
- g) no motions, contested matters, or adversary proceedings are pending before the Court.

19. The foregoing factors support closing the Chapter 11 Cases.

20. In addition, courts have also noted that entry of a final decree is appropriate to stop the accrual of Section 1930 Fees. *In re Junior Food Mart of Arkansas, Inc.*, 201 B.R. 522, 524 (Bankr. E.D. Ark. 1996) (closing case “in order that no further [Section 1930] [F]ees accrue”); *Jay Bee*, 207 B.R. at 539 (concluding that “it seems appropriate to close this case to stop the financial drain on the debtor” on account of the continuing accrual of Section 1930 Fees).

21. All expenses arising from the administration of the Chapter 11 Cases, including court fees, Section 1930 Fees, professional fees, and expenses, have been paid or will be paid as and when such fees and expenses come due, including Section 1930 Fees.

22. The Trusts have no need for the Chapter 11 Cases to remain open. The Court’s supervision is no longer required in the Chapter 11 Cases because the plan has been substantially consummated and the Chapter 11 Cases have been fully administered.

23. Accordingly, the Liquidation Trust submits that closing the Chapter 11 Cases complies with the Bankruptcy Code, Bankruptcy Rules and Local Rules and is otherwise appropriate under the circumstances and should be approved.

B. Termination of Claims and Noticing Services

24. In addition to the foregoing, the Liquidation Trust requests entry of an order terminating the Official Claims Agent Services provided by KCC pursuant to the KCC Retention Order. Upon termination of the Official Claims Agent Services, and except as otherwise provided herein, KCC will have no further obligations under the KCC Retention Order to the Court, the Trusts, or any other party in interest with respect to the Official Claims Agent Services in any of the Chapter 11 Cases.

25. Pursuant to Local Rule 2002-1(f)(ix), within twenty-eight days after this Court’s entry of the Proposed Order, KCC will (a) forward to the Clerk of the Court an electronic version

of all imaged claims; (b) upload the creditor mailing list into CM/ECF; and (c) docket in the Chapter 11 Cases a final claims register containing all the claims filed in the Chapter 11 Cases. The Liquidation Trust respectfully submits that the request to terminate the Official Claims Agent Services provided by KCC on the terms described in this Motion complies with the Local Rules and is otherwise appropriate under the circumstances and should be approved.

FINAL REPORT

26. In accordance with Local Rule 3022-1(c), a final report of the Chapter 11 Cases is attached hereto as **Exhibit B**.

NOTICE

27. Notice of this Motion will be provided to (i) the U.S. Trustee; and (ii) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Liquidation Trust respectfully submits that no further notice is required.

NO PRIOR REQUEST

28. No prior request for the relief sought herein has been made to this Court or any other Court.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Liquidation Trust respectfully request that the Court (a) enter an order granting the relief requested herein, substantially in the form attached hereto as **Exhibit A**; and (b) grant such other and further relief as the Court may deem just and proper.

Dated: March 21, 2024
Wilmington, Delaware

/s/ Huiqi Liu

RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi (No. 2732)

Paul N. Heath (No. 3704)

Zachary I. Shapiro (No. 5103)

Huiqi Liu (No. 6850)

One Rodney Square

920 N. King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

E-mail: defranceschi@rlf.com

heath@rlf.com

shapiro@rlf.com

liu@rlf.com

Attorneys for Liquidation Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS, INC., et al.,	:	Case No. 21–10670 (KBO)
	:	
Debtors.¹	:	Jointly Administered
	:	
	:	Obj. Deadline: April 4, 2024 at 4:00 p.m. (ET)
	:	Hearing Date: April 23, 2024 at 2:00 pm (ET)
-----	X	

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on March 21, 2024, the Liquidation Trust,² as the representative of the Debtors’ estates pursuant to the Plan, filed the *Motion of Liquidation Trust for Entry of a Final Decree (I) Closing Chapter 11 Cases and (II) Terminating Official Claims Agent Services* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections or responses to the relief requested in the Motion, if any, must be made in writing and filed with the Court on or before **April 4, 2024 at 4:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if any objections to the Motion are received, the Motion and such objections will be considered at a hearing before The Honorable Karen B. Owens, United States Bankruptcy Judge for the District of Delaware, at the Court, 824

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: TECT Aerospace Group Holdings, Inc. (9338); TECT Aerospace Kansas Holdings, LLC (4241); TECT Aerospace Holdings, LLC (9112); TECT Aerospace Wellington Inc. (4768); TECT Aerospace, LLC (8650); TECT Hypervelocity, Inc. (8103); and Sun Country Holdings, LLC (6079). The Debtors’ mailing address is TECT Aerospace Group Holdings, Inc., c/o Riveron RTS, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Plan (as defined in the Motion).

North Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801, on **April 23, 2024 at 2:00 p.m. (prevailing Eastern Time).**

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 21, 2024
Wilmington, Delaware

/s/ Huiqi Liu

RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi (No. 2732)

Paul N. Heath (No. 3704)

Zachary I. Shapiro (No. 5103)

Huiqi Liu (No. 6850)

One Rodney Square

920 N. King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

E-mail: defranceschi@rlf.com

heath@rlf.com

shapiro@rlf.com

liu@rlf.com

Attorneys for Liquidation Trust

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS, INC., et al.,	:	Case No. 21–10670 (KBO)
	:	
Debtors.¹	:	Jointly Administered
	:	
	:	Re: D.I. __
-----	X	

**FINAL DECREE (I) CLOSING CHAPTER 11 CASES
AND (II) TERMINATING OFFICIAL CLAIMS AGENT SERVICES**

Upon the motion (the “**Motion**”)² of the Liquidation Trust for entry of an order (i) closing the Chapter 11 Cases and (ii) terminating the Official Claims Agent Services provided by Kurtzman Carson Consultants, LLC (“**KCC**”), all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: TECT Aerospace Group Holdings, Inc. (9338); TECT Aerospace Kansas Holdings, LLC (4241); TECT Aerospace Holdings, LLC (9112); TECT Aerospace Wellington Inc. (4768); TECT Aerospace, LLC (8650); TECT Hypervelocity, Inc. (8103); and Sun Country Holdings, LLC (6079). The Debtors’ mailing address is TECT Aerospace Group Holdings, Inc., c/o Riveron RTS, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

thereon; and this Court having determined that there is good and sufficient cause for the relief granted in this Order, therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Chapter 11 Cases of TECT Aerospace Group Holdings, Inc., Case No. 21-10670 (KBO), TECT Aerospace Kansas Holdings, LLC, Case No. 21-10671 (KBO), TECT Aerospace Holdings, LLC, Case No. 21-10672 (KBO), TECT Aerospace Wellington Inc., Case No. 21-10673 (KBO), TECT Aerospace, LLC, Case No. 21-10674 (KBO), TECT Hypervelocity, Inc., Case No. 21-10675 (KBO), and Sun Country Holdings, LLC, Case No. 21-10676 (KBO), are hereby CLOSED pursuant to section 350(a) of the Bankruptcy Code, effective as of the date of the entry of this Order.
3. The Clerk of the Court shall enter this Order on the dockets of the Chapter 11 Cases, and thereafter, the dockets shall be marked as “Closed.”
4. The Official Claims Agent Services of KCC are terminated upon the completion of the services listed in paragraph 5, *infra*. Thereafter, KCC will have no further obligations to the Court, the Trusts, or any other party in interest with respect to the Official Claims Agent Services.
5. Pursuant to Local Rule 2002-1(f)(ix), within twenty-eight (28) days after the entry of this Order, KCC shall (a) forward to the Clerk of the Court an electronic version of all imaged claims; (b) upload the creditor mailing list into CM/ECF; and (c) docket in the Debtors’ Chapter 11 Cases a final claims register containing all the claims filed in the Chapter 11 Cases.
6. Within thirty (30) days of entry of this Order, the Liquidation Trust shall provide to the Office of the United States Trustee for the District of Delaware all quarterly reports not already filed, including reports for any partial quarter, and pay any Section 1930 Fees, including

Section 1930 Fees for disbursements up through the date of entry of this Order, even if for a partial quarter.

7. The Liquidation Trust and KCC are authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

8. Entry of this Order is without prejudice to the rights of the Liquidation Trust or any other party in interest to reopen the Chapter 11 Cases for cause pursuant to section 350(b) of the Bankruptcy Code.

9. Notwithstanding any provision of the Bankruptcy Rules to the contrary, the terms and conditions of this Order shall be effective and enforceable immediately upon its entry.

10. This Court shall retain jurisdiction over the Chapter 11 Cases to the extent permitted under the Plan and all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

EXHIBIT B

Final Report

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

-----	X	
<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS, INC., et al.,	:	Case No. 21-10670 (KBO)
	:	
Debtors.¹	:	Jointly Administered
-----	X	

FINAL REPORT IN CHAPTER 11 CASES

Pursuant to Local Rule 3022-1(c),² the following is a final report regarding the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”):

1. On April 5, 2021, the Debtors commenced with this Court voluntary cases under chapter 11 of title 11 of the United States Code.
2. On March 8, 2022, this Court entered the Confirmation Order, which confirmed and approved the Plan. The Plan was substantially consummated upon the Effective Date of the Plan, which occurred on March 11, 2022.
3. All expenses arising from the administration of the Debtors’ estates and the Chapter 11 Cases, including, without limitation, court fees, Section 1930 Fees, professional fees, and expenses, have been paid or will be paid as and when such fees and expenses come due.
4. The Plan has been substantially consummated and all distributions that were

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: TECT Aerospace Group Holdings, Inc. (9338); TECT Aerospace Kansas Holdings, LLC (4241); TECT Aerospace Holdings, LLC (9112); TECT Aerospace Wellington Inc. (4768); TECT Aerospace, LLC (8650); TECT Hypervelocity, Inc. (8103); and Sun Country Holdings, LLC (6079). The Debtors’ mailing address is TECT Aerospace Group Holdings, Inc., c/o Riveron RTS, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.

² This final report (this “Final Report”) is being filed contemporaneously with the *Motion of Liquidation Trust for Entry of a Final Decree (I) Closing Chapter 11 Cases and (II) Terminating Official Claims Agent Services* (the “**Motion**”). Capitalized terms used herein and not otherwise defined shall have the meanings given to them in the Motion.

required to be made pursuant to the Plan have been made or will be made in accordance with the terms of the Plan or by agreement of the parties.

5. On June 13, 2022, the Final Fee Order was entered.

6. All motions, contested matters, and other proceedings that were before this Court with respect to the Chapter 11 Cases have been resolved, dismissed, or withdrawn.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: March 21, 2024

/s/ Shaun Martin

Shaun Martin
Liquidation Trustee
Liquidation Trust