

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS,	:	Case No. 21-10670 (KBO)
INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors. ¹	:	
	:	Re: D.I. 1109
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**CERTIFICATION OF COUNSEL REGARDING MOTION OF
LIQUIDATION TRUST FOR ENTRY OF A FINAL DECREE
(I) CLOSING CHAPTER 11 CASES AND (II) TERMINATING
OFFICIAL CLAIMS AGENT SERVICES**

The undersigned hereby certifies as follows:

1. 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* [Docket No. 1109] (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Bankruptcy Court**"). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the "**Original Order**").

2. Pursuant to the *Notice of Motion and Hearing* filed with the Motion, any objections or responses to the relief requested in the Motion, if any, must be made in writing and filed with

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 Motion (as defined herein).



the Court on or before April 4, 2024 at 4:00 p.m. (prevailing Eastern Time) (the “**Response Deadline**”).

3. Prior to the Response Deadline, the Liquidation Trust received an informal response from the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”). The Liquidation Trust has not otherwise received any other informal responses or objections to the Motion, and no responses or objections to the Motion appear on the docket in the Chapter 11 Cases.

4. The Liquidation Trust has prepared a revised proposed form of order (the “**Revised Order**”) resolving the informal response from the U.S. Trustee. A copy of the Revised Order is attached hereto as **Exhibit A**. For the convenience of the Court and all parties in interest, a blackline of the Original Order marked against the Revised Order is attached hereto as **Exhibit B**.

WHEREFORE, the Liquidation Trust respectfully requests that the Revised Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: April 5, 2024
Wilmington, Delaware

/s/ Ashly L. Riches
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Attorneys for Liquidation Trust

EXHIBIT A

Revised Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

<i>In re</i> TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i>, <p style="text-align: center;">Debtors.¹ </p>	X : : : : : : : : X	Chapter 11 Case No. 21–10670 (KBO) Jointly Administered Re: D.I. 1109
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**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

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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, including on the grounds that the final post-confirmation quarterly reports are deficient.

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

Blackline

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

<i>In re</i> TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i>, <p style="text-align: center;">Debtors.¹ </p>	X : : : : : : : : X	Chapter 11 Case No. 21–10670 (KBO) Jointly Administered Re: D.I. <u>1109</u>
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