

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

*In re*

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

Case No. 23-90611 (MI)

Chapter 11

(Jointly Administered)

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

Adv. Pro. No. 23-03091

**SSD INVESTMENTS LTD., et al.,**  
  
Defendants.

**SSD INVESTMENTS LTD., et al.,**

Counterclaim Plaintiffs,

v.

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

Counterclaim Defendants.

**2024/2026 HOLDERS' JOINDER IN SUPPORT OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS' OBJECTION TO PLATINUM'S  
EMERGENCY MOTION TO EXCLUDE THE TESTIMONY OF JOSEPH DENHAM**

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



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The 2024/2026 Holders hereby join the Official Committee of Unsecured Creditors' ("Committee") Objection (ECF #1234, the "Objection") to Platinum's Emergency Motion to Exclude the Testimony of Joseph Denham (ECF #1208, the "Motion") and state as follows:

1. On January 23, 2024, the Parties entered into the *Stipulation as to Scope of Adversary Proceeding Trial and Resolution of the 2024/2026 Holders' Standing Motion*, which provided that the Court may consider evidence relating to, among other things, the 2024/2026 Holders' fraudulent transfer claims included in their proposed Second Amended Counterclaims. ECF #541 ¶ 3(b). Consistent with that order, the parties thus met and conferred "regarding an expedited schedule for the identification of such additional evidence, including expert evidence concerning solvency." ECF #541 at 7 n.7. And, on the February 29, 2024, date agreed upon by the parties, the Committee disclosed the expert report of Joseph Denham and the 2024/2026 Holders informed the parties that they also intended to rely upon the report of Mr. Denham and to call him as a witness at trial.

2. Accordingly, the 2024/2026 Holders expressly adopt, join, and incorporate by reference all arguments and positions set forth in the Committee's Objection.

Dated: May 2, 2024  
New York, New York

**KOBRE & KIM LLP**

By: /s/ Darryl G. Stein

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*Counsel to the 2024/2026 Holders*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2024, a copy of the foregoing Opposition was served through the Court's CM/ECF notification system to all parties who have appeared in this case through counsel or who have submitted a request for service by CM/ECF.

/s/ Darryl G. Stein  
Darryl G. Stein