

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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<i>In re</i>	:	<b>Chapter 11</b>
	:	
TECT AEROSPACE GROUP HOLDINGS,	:	<b>Case No. 21-10670 (KBO)</b>
INC., <i>et al.</i> ,	:	
	:	<b>Joint Administration Requested</b>
<b>Debtors.</b> <sup>1</sup>	:	
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**NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST DAY MOTIONS SCHEDULED FOR APRIL 7, 2021 AT 2:00 P.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE KAREN B. OWENS, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DEALWARE<sup>2</sup>**

**THIS HEARING WILL BE HELD BY VIDEO VIA ZOOM. BOTH VIDEO AND AUDIO WILL BE THROUGH ZOOM. COURTCALL WILL NOT BE USED.**

**ALL PARTIES MUST REGISTER THEIR ZOOM APPEARANCE NO LATER THAN WEDNESDAY, APRIL 7, 2021 AT 12:00 P.M. (ET) USING THE LINK BELOW:**

<https://debuscourts.zoomgov.com/meeting/register/vJIsf-2gqzooEktZ37IUEGpIaV7IpsIbOfE>

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM.**

PLEASE TAKE NOTICE that on April 5, 2021, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the following voluntary petitions (collectively, the “**Petitions**”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

A. Voluntary Petitions:

1. TECT Aerospace Group Holdings, Inc. [[Case No. 21-10670 – D.I. 1](#)]
2. TECT Aerospace Kansas Holdings, LLC [[Case No. 21-10671 – D.I. 1](#)]

<sup>1</sup> 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 300 W. Douglas, Suite 100, Wichita, KS 67202.

<sup>2</sup> All motions and other pleadings referenced herein are available online at the following address: [www.kcellc.net/TECTAerospace](http://www.kcellc.net/TECTAerospace).



3. TECT Aerospace Holdings, LLC [[Case No. 21-10672 – D.I. 1](#)]
4. TECT Aerospace Wellington Inc. [[Case No. 21-10673 – D.I. 1](#)]
5. TECT Aerospace, LLC [[Case No. 21-10674 – D.I. 1](#)]
6. TECT Hypervelocity, Inc. [[Case No. 21-10675 – D.I. 1](#)]
7. Sun Country Holdings, LLC [[Case No. 21-10676 – D.I. 1](#)]

PLEASE TAKE FURTHER NOTICE that in addition to filing the Petitions, the Debtors filed the following first day motions and related documents (collectively, the “**First Day Motions**”):

B. First Day Declaration:

8. Declaration of Shaun Martin in Support of Chapter 11 Petitions and First Day Pleadings [[D.I. 13](#)]

C. First Day Motions:

9. Motion of Debtors Pursuant to Fed. R. Bankr. P. 1015(b) for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[D.I. 2](#)]
10. Application of Debtors Pursuant to 28 U.S.C. § 156(c) for Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent *Nunc Pro Tunc* to the Petition Date [[D.I. 6](#)]
11. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees; and (II) Granting Related Relief [[D.I. 9](#)]
12. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Maintain Their Insurance Policies and Programs, (B) Honor All Insurance Obligations, and (C) Maintain Their Premium Finance Agreement; and (II) Granting Related Relief [[D.I. 10](#)]
13. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[D.I. 4](#)]
14. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits, and Other Compensation, (B) Maintain Employee Benefit Programs and Pay Related

Obligations, and (C) Pay Prepetition Employee Expenses and (II) Granting Related Relief [\[D.I. 5\]](#)

15. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign Vendors, and (C) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority Status for Outstanding Prepetition Purchase Orders, and (III) Granting Related Relief [\[D.I. 7\]](#)
16. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Shippers and Other Lien Claimants and (II) Granting Related Relief [\[D.I. 8\]](#)
17. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue Their Shared Services and (II) Granting Related Relief [\[D.I. 11\]](#)
18. Motion of Debtors for Entry of Interim and Final Order (I) Authorizing Debtors to (A) Continue Existing Cash Management System, Bank Accounts, and Business Forms, (B) Make Ordinary Course Changes Thereto, (C) Honor Certain Prepetition Obligations Related to the Use Thereof, and (D) Continue Certain Intercompany Transactions, (II) Grant Administrative Expense Priority for Post-Petition Debtor Intercompany Claims; (III) Extending Time to Comply with 11 U.S.C. § 345(b); and (IV) Granting Related Relief [\[D.I. 3\]](#)
19. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing, and (B) Use Cash Collateral; (II) Granting Adequate Protection to Prepetition Secured Parties; and (III) Granting Related Relief [\[D.I. 12\]](#)

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the First Day Motions will be held via Zoom and is scheduled for April 7, 2021 at 2:00 p.m. (prevailing Eastern Time) before The Honorable Karen B. Owens, United States Bankruptcy Judge for the District of Delaware (the “**First Day Hearing**”). Parties who wish to participate in the First Day Hearing must register their Zoom appearance by 12:00 p.m. (ET) on April 7, 2021 via: <https://debuscourts.zoomgov.com/meeting/register/vJIsf-2gqzooEktZ37IUEGpIaV7IpsIbOfE>

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made prior to or at the First Day Hearing.

Dated: April 6, 2021  
Wilmington, Delaware

/s/ Paul N. Heath  
RICHARDS, LAYTON & FINGER, P.A.  
Daniel J. DeFranceschi (No. 2732)  
Paul N. Heath (No. 3704)  
Amanda R. Steele (No. 5530)  
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  
steele@rlf.com

*Proposed Attorneys for the Debtors  
and Debtors in Possession*