

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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| ----- | X | |
| <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. 10, 34 & 44 |
| ----- | X | |

CERTIFICATE OF NO OBJECTION REGARDING 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

The undersigned hereby certifies that he has received no answer, objection or any other responsive pleading with respect to the *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] (the “**Motion**”) filed by the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on April 6, 2021.

The undersigned further certifies that he has reviewed the Court’s docket in the above-referenced chapter 11 cases and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the *Interim Order (I) Authorizing Debtors to (A) Maintain Their Insurance Policies and Programs, (B) Honor All Insurance Obligations, and (C) Maintain*

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 300 W. Douglas, Suite 100, Wichita, KS 67202.



Their Premium Finance Agreement; and (II) Granting Related Relief [D.I. 34] entered on April 7, 2021 and *Notice of (1) Entry of Interim Order (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; and (2) Final Hearing Thereon* [D.I. 44] filed on April 8, 2021, objections or responses to the Motion were to be filed no later than April 29, 2021, at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”). The Objection Deadline was extended to May 3, 2021 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors (the “**Committee**”) and the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”). The Committee and the U.S. Trustee have informed counsel for the Debtors that they do not object to the relief requested.

WHEREFORE, the Debtors respectfully request that the proposed form of final order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: May 4, 2021
Wilmington, Delaware

/s/ Travis J. Cuomo

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*Proposed Attorneys for the Debtors
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EXHIBIT A

(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

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| <i>In re</i> | : | Chapter 11 |
| | : | |
| TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i> , | : | Case No. 21–10670 (KBO) |
| | : | |
| Debtors. ¹ | : | Re: D.I. 10, 34, 44 |
| ----- | X | |

**FINAL ORDER (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**

Upon the motion (the “**Motion**”)² of TECT Aerospace Group Holdings, Inc. and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), for entry of a final order (this “**Final Order**”) (i) authorizing, but not directing, the Debtors to (a) maintain, continue and renew their Insurance Policies and Programs, (b) honor their Insurance Obligations in the ordinary course of business during these chapter 11 cases, and (c) maintain, continue and renew their Premium Finance Agreement; and (ii) granting related relief, 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(a)–(b) and 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue

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 300 W. Douglas, Suite 100, Wichita, KS 67202.

² Capitalized terms used but not otherwise defined herein have the meanings given to those terms in the Motion.

being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the Notice Parties under the circumstances, and it appearing that no other or further notice need be provided; and this Court having held a hearing, if necessary, to consider the final relief requested in the Motion (the “**Hearing**”); and upon the First Day Declaration; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing, if any, establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted on a final basis to the extent set forth herein.
2. The Debtors are authorized, but not directed, to pay all Insurance Obligations owed in connection with the Insurance Policies and Premium Finance Agreement, including any Insurance Brokers Fees and Monthly PFA Payments, whether incurred prepetition or post-petition; *provided that* payments on account of prepetition Insurance Obligations shall not exceed \$150,000 in the aggregate without further order of this Court.
3. The Debtors are further authorized, but not directed, to maintain their Insurance Policies and Programs in accordance with practices and procedures that were in effect before the commencement of these chapter 11 cases.
4. The Debtors are further authorized, but not directed, to revise, extend, supplement, change, terminate, and/or replace insurance coverage or premium financing arrangements, as needed and to enter into new insurance policies or premium financing arrangements through renewal or purchase of new insurance policies or premium financing arrangements, in each case in the ordinary course of business and without further notice to, hearing before, or order from this

Court; *provided that*, absent further order of this Court upon notice, during the course of these chapter 11 cases, the Debtors shall not renew or enter into any new premium financing agreement upon any terms less favorable than those in the existing Premium Finance Agreement.

5. The Debtors shall promptly notify the DIP Agent in the event that any of the Insurance Policies or Programs are terminated.

6. Each of the Banks at which the Debtors maintain their accounts relating to the payment of the Insurance Obligations are authorized to (i) receive, process, honor, and pay all checks presented for payment and to honor all fund transfer requests made by the Debtors related thereto, to the extent that sufficient funds are on deposit in those accounts and (ii) accept and rely on all representations made by the Debtors with respect to which checks, drafts, wires, or automated clearing house transfers should be honored or dishonored in accordance with this or any other order of the Court, whether such checks, drafts, wires, or transfers are dated prior to, on, or subsequent to the Petition Date, without any duty to inquire otherwise.

7. Nothing contained in the Motion, the Interim Order, or this Final Order, nor any payment made pursuant to the authority granted by the Interim Order or this Final Order, is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors, (ii) a waiver of the Debtors' or any appropriate party in interest's rights to dispute the amount of, basis for, or validity of any claim against the Debtors, (iii) a waiver of any claims or causes of action which may exist against any creditor or interest holder, or (iv) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy between the Debtors and any third party under section 365 of the Bankruptcy Code.

8. Under the circumstances of these chapter 11 cases, notice of the Motion is adequate under Bankruptcy Rule 6004(a) and the Local Rules.

9. Notwithstanding Bankruptcy Rule 6004(h), this Final Order shall be immediately effective and enforceable upon its entry.

10. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Final Order.

11. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Final Order.