

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON OCTOBER 19, 2021 AT 1:00 P.M. (PREVAILING EASTERN TIME)³**

**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
11:00 A.M. (ET) ON OCTOBER 19, 2021 USING THE LINK BELOW:**

<https://debuscourts.zoomgov.com/meeting/register/vJlsc-2grjstG2v5gQEVuvefTuCoOoyRy-M>

YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM.

I. WITHDRAWN MATTERS:

1. Motion of the Official Committee of Unsecured Creditors for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code Pursuant to 11 U.S.C. § 1112(b) [[D.I. 476](#) – filed September 10, 2021]

Objection/Response Deadline: September 24, 2021 at 4:00 p.m. (ET); extended to October 12, 2021 at 4:00 p.m. (ET) for the Debtors and The Boeing Company

Objections/Responses Received: None

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 Conway MacKenzie, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.

² Amended items appear in bold.

³ All motions and other pleadings referenced herein are available online at the following address: www.kcelc.net/TECTAerospace.



Related Documents:

- i. Amended Notice of Motion of the Official Committee of Unsecured Creditors for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code Pursuant to 11 U.S.C. § 1112(b) [[D.I. 504](#) – filed September 21, 2021]
- ii. Notice of Withdrawal of Motion of the Official Committee of Unsecured Creditors for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code Pursuant to 11 U.S.C. § 1112(b) [[D.I. 544](#) – filed October 13, 2021]

Status: On October 13, 2021, the movant withdrew this motion. Accordingly, a hearing regarding this matter is not required.

2. Motion of Utica Realty Park City, LLC and Utica Realty Wellington, LLC to Fix Deadline for Debtors to Assume or Reject Unexpired Leases of Real Property [[D.I. 514](#) – filed October 1, 2021]

Objection/Response Deadline: October 12, 2021 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Motion of Debtors for Entry of an Order (I) Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief [[D.I. 548](#) – filed October 14, 2021]

Related Documents:

- i. Notice of Withdrawal of Motion [[D.I. 556](#) – filed October 14, 2021]

Status: On October 14, 2021, the movants withdrew this motion. Accordingly, a hearing regarding this matter is not required.

II. RESOLVED MATTERS:

3. Motion of Debtors for Entry of an Order Further Extending Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief [[D.I. 517](#) – filed October 4, 2021]

Objection/Response Deadline: October 12, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of Debtors for Entry of an Order Further Extending Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief [[D.I. 545](#) – filed October 13, 2021]
- ii. Order Further Extending Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief [[D.I. 552](#) – entered October 14, 2021]

Status: On October 14, 2021, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

4. Motion of Debtors for an Order (I) Further Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and (II) Granting Related Relief [[D.I. 526](#) – filed October 4, 2021]

Objection/Response Deadline: October 12, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of Debtors for an Order (I) Further Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and (II) Granting Related Relief [[D.I. 546](#) – filed October 13, 2021]
- ii. Order Further Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and Granting Related Relief [[D.I. 553](#) – entered October 14, 2021]

Status: On October 14, 2021, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

5. Debtors' Fourth Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts, Effective as of the Rejection Date [[D.I. 531](#) – filed October 5, 2021]

Objection/Response Deadline: October 12, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Debtors' Fourth Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts, Effective as of the Rejection Date [[D.I. 547](#) – filed October 13, 2021]

- ii. Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date [[D.I. 554](#) – entered October 14, 2021]

Status: On October 14, 2021, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

III. CONTINUED MATTERS:

- 6. Interim Fee Applications

Status: All interim fee applications noticed for this hearing have been continued to the omnibus hearing scheduled for October 28, 2021 at 2:00 p.m. (ET).

IV. CONTESTED MATTER GOING FORWARD:

- 7. Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington, LLC to Remove Equipment from Debtors' Location [[D.I. 518](#) – filed October 4, 2021]

Objection/Response Deadline: October 12, 2021 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Objection of The Boeing Company and Central Kansas Aerospace Manufacturing, LLC to the Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington to Remove Equipment from the Debtor's Location [[D.I. 541](#) – filed October 12, 2021]
- B. Declaration of Edward J. Neveril in Support of Objection of The Boeing Company and Central Kansas Aerospace Manufacturing, LLC to the Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington to Remove Equipment from the Debtor's Location [[D.I. 542](#) – filed October 12, 2021]
- C. **Objection by The Boeing Company and Central Kansas Aerospace Manufacturing, LLC to Proposed Testimony Regarding Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington, LLC to Remove Equipment from Debtors' Location; Motion to Strike [[D.I. 560](#) – filed 10/18/21]**

Related Documents:

- i. Utica Movants' Motion for Entry of Order Scheduling an Expedited Hearing and Shortening Notice and Objection Periods for the Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington, LLC to Remove Equipment from Debtors' Location [[D.I. 527](#) – filed October 4, 2021]
- ii. Objection of The Boeing Company and Central Kansas Aerospace Manufacturing, LLC to Utica Movants' Motion for Entry of Order Scheduling an Expedited Hearing and Shortening Notice and Objection Periods for the Emergency Motion of Utica Equipment Finance LLC and Utica Realty

Wellington, LLC to Remove Equipment from Debtors' Location [[D.I. 529](#) – filed October 5, 2021]

- iii. Order Denying an Expedited Hearing, Shortening Notice and Objection Periods for Emergency Motion to Remove Equipment [[D.I. 532](#) – entered October 6, 2021]
- iv. Notice of Motions and Hearing [[D.I. 539](#) – filed October 8, 2021]
- v. Exhibit (to Notice of Hearing re: Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington, LLC to Remove Equipment from Debtors' Location) [[D.I. 540](#) – filed October 8, 2021]
- vi. Errata to Emergency Motion of Utica Equipment Finance LLC and Utica Realty Wellington, LLC to Remove Equipment from Debtors' Location [[D.I. 555](#) – filed October 14, 2021]
- vii. Declaration of Armin Walther in Support of Utica Equipment Finance LLC and Utica Realty Wellington, LLC's Emergency Motion to Remove Equipment from Debtors' Location [[D.I. 557](#) – filed October 14, 2021]
- viii. Declaration of Horace Jennings in Support of Utica Equipment Finance LLC and Utica Realty Wellington, LLC's Emergency Motion to Remove Equipment from Debtors' Location [[D.I. 558](#) – filed October 14, 2021]

Witnesses:

- A. The Boeing Company and Central Kansas Aerospace Manufacturing, LLC will offer the testimony by declaration of Edward J. Neveril, Vice President and Managing Director of Enterprise Corporate Development of The Boeing Company. If live testimony is needed, Mr. Neveril will testify from Chicago, Illinois.
- B. Utica Equipment Finance LLC and Utica Realty Wellington, LLC (together, "Utica") **will offer the testimony by declaration** of Armin Walther, CEO of bavus technologie gmbh. **If live testimony is needed, Mr. Walther will testify from Baienfurt, Germany.**
- C. **Utica will offer the testimony by declaration** of Horace Jennings, Vice President, Secretary and Treasurer of Utica Equipment Finance, LLC. **If live testimony is needed, Mr. Jennings will testify from Gainesville, Georgia.**
- D. **Utica will offer the testimony by proffer or live testimony of Scott Brown. If live testimony is needed, Mr. Brown will testify from Wichita, Kansas.**
- E. **Utica will offer the testimony by proffer or live testimony of John Storm. If live testimony is needed, Mr. Storm will testify from Wichita, Kansas.**

Status: The hearing regarding this matter will go forward on a contested basis.

Dated: October 18, 2021
Wilmington, Delaware

/s/ Christopher M. De Lillo
RICHARDS, LAYTON & FINGER, P.A.
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
Zachary I. Shapiro (No. 5103)
Christopher M. De Lillo (No. 6355)
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
shapiro@rlf.com
delillo@rlf.com

Attorneys for the Debtors and Debtors in Possession