

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
TECT AEROSPACE GROUP)	Case No. 21-10670 (KBO)
HOLDINGS, INC., <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	Obj. Deadline: November 10, 2021 at 4:00 p.m. (ET)
)	

**SUMMARY OF SIXTH MONTHLY APPLICATION OF KILPATRICK
TOWNSEND & STOCKTON LLP FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 1, 2021 THROUGH AND INCLUDING SEPTEMBER 30, 2021**

Name of Applicant:	Kilpatrick Townsend & Stockton LLP		
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors		
Effective Date of Retention:	April 21, 2021 (Order entered May 20, 2021)		
Period for which Compensation and Reimbursement is Sought:	September 1, 2021 – September 30, 2021		
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$109,360.00 (80% of \$136,700.00)		
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$773.52		
This is an/a	<u> X </u> monthly	<u> </u> interim	<u> </u> final application

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.



211067021102000000000001

Prior Monthly Fee Applications

Application	Date Filed	Period Covered	Requested Fees/Expenses	Approved Fees/ Expenses
1 st Application	05/27/2021	4/21/2021 – 4/30/2021	\$174,631.00/\$0.00	\$139,704.80/\$0.00
2 nd Application	06/28/2021	5/1/2021 – 5/31/2021	\$289,367.50/\$734.02	\$231,494.00/\$734.02
3 rd Application	7/19/2021	6/1/2021 – 6/30/21	\$238,776.50/\$3,543.86	\$191,021.20/\$3,543.86
4 th Application	8/24/2021	7/1/2021 – 7/31/2021	\$114,668.50/\$153.63	\$91,734.80/\$153.63
5 th Application	9/22/2021	8/1/2021 – 8/31/2021	\$77,719.50/\$41.28	\$62,175.60/\$41.28

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TECT AEROSPACE GROUP
HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 21-10670 (KBO)
)
) (Jointly Administered)
)
) **Obj. Deadline: November 10, 2021 at 4:00 p.m. (ET)**
)

**SIXTH MONTHLY APPLICATION OF KILPATRICK TOWNSEND &
STOCKTON LLP FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 1, 2021 THROUGH AND INCLUDING SEPTEMBER 30, 2021**

Pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), Kilpatrick Townsend & Stockton LLP (“Kilpatrick Townsend” or “Applicant”), lead counsel to the Official Committee of Unsecured Creditors (the “Committee”), hereby submits its sixth monthly application (the “Application”) for compensation and reimbursement of expenses for the period from September 1, 2021 through and including September 30, 2021 (the “Application Period”). By this Application, Kilpatrick Townsend seeks a monthly interim allowance of compensation in the amount of \$136,700.00 and reimbursement of actual expenses necessarily incurred in the

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.

amount of \$773.52 for an aggregate total of \$137,473.52 in accordance with that certain *Order Authorizing the Employment and Retention of Kilpatrick Townsend & Stockton LLP as Attorneys for the Official Committee of Unsecured Creditors of TECT Aerospace Group Holdings, Inc., et al., Effective As of April 21, 2021* [D.I. 184] (the “Kilpatrick Townsend Retention Order”) and that certain *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* [D.I. 135] (the “Interim Compensation Order”). Kilpatrick Townsend seeks payment of \$109,360.00 (80% of the allowed fees) and reimbursement of \$773.52 (100% of the allowed expenses), for an aggregate total payment of \$110,133.52 for the Application Period. In support of the Application, Kilpatrick Townsend respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the above-captioned cases (the “Chapter 11 Cases”) and this Application in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Rule 2016 of the Bankruptcy Rules and Rule 2016-2 of the Local Rules.

BACKGROUND

3. On April 5, 2021 (the “Petition Date”), the Debtors filed voluntary petitions for relief with the Court under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases.

4. On April 20, 2021, the Office of the United States Trustee for the District of Delaware formed the Committee. *See* D.I. 76.

5. On April 21, 2021, the Committee selected the undersigned counsel to serve as its lead counsel in these Chapter 11 Cases.

6. On May 20, 2021, the Court entered the Kilpatrick Townsend Retention Order.

PROFESSIONAL SERVICES RENDERED

7. Subject to Court approval, Kilpatrick Townsend seeks payment for compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by Kilpatrick Townsend during the Application Period. The rates charged by Kilpatrick Townsend in these Chapter 11 Cases do not differ from the rates charged to Kilpatrick Townsend's non-bankruptcy clients.

8. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Committee during the Application Period, the regular customary billing rates and the total value of time incurred by each of the Kilpatrick Townsend attorneys rendering services to the Committee is attached hereto as **Exhibit A**.

9. During the Application Period, Kilpatrick Townsend rendered services related to, among other matters: (a) preparing a motion to convert the Chapter 11 Cases to chapter 7; (b) negotiating with Boeing regarding a potential settlement and the resolution of these Chapter 11 Cases; (c) investigating the proposed sale of certain of the Debtors' equipment; (d) reviewing a draft standing motion and complaint related to estate causes of action; (e) reviewing and analyzing amendments to the Final DIP Order and the related extension of the DIP Budget and DIP maturity date; and (f) hosting Committee calls and preparing presentation materials for same.

10. A copy of the computer generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 USC § 330 by Attorneys in Larger Chapter 11 Cases*, as well as a summary of time recorded by project billing category, is attached hereto as **Exhibit B**. A statement of expenses incurred by Kilpatrick Townsend during the Application Period is attached hereto as **Exhibit C**. All time entries and requested expenses are in compliance with Rule 2016-2 of the Local Rules.

11. On May 5, 2021, the Court entered the Interim Compensation Order. Pursuant to the Interim Compensation Order, Kilpatrick Townsend and other estate professionals retained in the Chapter 11 Cases are authorized to file and serve upon the Debtors and the parties identified in the Interim Compensation Order monthly fee applications (each, a “Monthly Fee Application”) for their fees and expenses. After the expiration of a twenty-one (21) day objection period, the Debtors are authorized to promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the relevant Monthly Fee Application, unless an objection has been filed to the requested fees and/or expenses or the Court orders otherwise.

12. In accordance with the Interim Compensation Order, Kilpatrick Townsend has filed and served upon the Debtors and the other notice parties identified in the Interim Compensation Order this Application regarding its fees and expenses incurred during the Application Period.

13. All services rendered for which compensation is requested and all costs incurred for which reimbursement is requested by Kilpatrick Townsend in this Application were reasonable, necessary and appropriate and were performed for or incurred on behalf of the

Committee during the Application Period. In addition, Kilpatrick Townsend worked closely with the Committee's Delaware counsel, Womble Bond Dickinson (US) LLP, and the Committee's financial advisor, Province, Inc., to ensure that there was no duplication of services and that all matters were appropriately and diligently handled for the Committee in a timely and efficient manner.

CONCLUSION

14. Applicant has necessarily and properly expended 186.5 hours of services in the performance of its duties as lead counsel to the Committee during the Application Period. Applicant respectfully requests an interim fee allowance for professional services rendered in the amount of \$109,360.00 (comprising 80% of \$136,700.00). Applicant has also necessarily incurred reasonable and necessary disbursements in the amount of \$773.52 in the performance of Applicant's duties to the Committee during the Application Period and respectfully requests reimbursement of such amount.

15. As stated in the Declaration of David M. Posner, annexed hereto as **Exhibit D**, Applicant has not agreed to share any compensation to be received herein with any other person.

WHEREFORE, Applicant respectfully requests an interim award of compensation for professional services rendered as lead counsel to the Committee during the Application Period in the sum of \$109,360.00 (comprising 80% of \$136,700.00) together with reimbursement of disbursements in the amount of \$773.52 and for such other and further relief as the Court deems just and proper.

Dated: October 20, 2021

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ David M. Posner

David M. Posner, Esq. (admitted *pro hac vice*)

Gianfranco Finizio, Esq. (admitted *pro hac vice*)

Kelly E. Moynihan, Esq. (admitted *pro hac vice*)

1114 Avenue of the Americas

New York, NY 10036

Telephone: (212) 775-8700

Facsimile: (212) 775-8800

E-mail: dposner@kilpatricktownsend.com

gfinizio@kilpatricktownsend.com

kmoynihan@kilpatricktownsend.com

*Counsel to the Official Committee of Unsecured
Creditors of TECT Aerospace Group Holdings, Inc.,
et al.*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TECT AEROSPACE GROUP
HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 21-10670 (KBO)

) (Jointly Administered)

) **Obj. Deadline: November 10, 2021 at 4:00 p.m. (ET)**
)

**NOTICE OF SIXTH MONTHLY APPLICATION OF KILPATRICK
TOWNSEND & STOCKTON LLP FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 1, 2021 THROUGH AND INCLUDING SEPTEMBER 30, 2021**

PLEASE TAKE NOTICE that, on October 20, 2021, Kilpatrick Townsend & Stockton LLP, lead counsel for the Official Committee of Unsecured Creditors (the “Committee”), filed the *Sixth Monthly Application of Kilpatrick Townsend & Stockton LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period of September 1, 2021 through September 30, 2021* (the “Application”).

If you object to the relief sought by the Application, you are required to file a response to the Application, on or before **November 10, 2021 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon Committee’s counsel:

Matthew P. Ward, Esq.
Morgan L. Patterson, Esq.
Lisa Bittle Tancredi, Esq.
WOMBLE BOND DICKINSON (US) LLP
1313 North Market Street, Suite 1200
Wilmington, DE 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
E-mail: matthew.ward@wbd-us.com
morgan.patterson@wbd-us.com
lisa.tancredi@wbd-us.com

David M. Posner, Esq.
Gianfranco Finizio, Esq.
Kelly E. Moynihan, Esq.
KILPATRICK TOWNSEND & STOCKTON LLP
1114 Avenue of the Americas
New York, NY 10036
Telephone: (212) 775-8700
Facsimile: (212) 775-8800
E-mail: dposner@kilpatricktownsend.com
gfinizio@kilpatricktownsend.com
kmoynihan@kilpatricktownsend.com

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.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

A HEARING ON THE APPLICATION WILL BE HELD ONLY IF OBJECTIONS ARE FILED, OR IF THE COURT DIRECTS OTHERWISE AT A DATE AND TIME TO BE SCHEDULED BY THE COURT.

Dated: October 20, 2021
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Morgan L. Patterson

Matthew P. Ward (Del. Bar No. 4471)
Morgan L. Patterson (Del. Bar No. 5388)
Lisa Bittle Tancredi (Del. Bar No. 4657)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
Email: matthew.ward@wbd-us.com
morgan.patterson@wbd-us.com
lisa.tancredi@wbd-us.com

-AND-

KILPATRICK TOWNSEND & STOCKTON LLP

David M. Posner (admitted *pro hac vice*)
Gianfranco Finizio (admitted *pro hac vice*)
Kelly E. Moynihan (admitted *pro hac vice*)
The Grace Building
1114 Avenue of the Americas
New York, New York 10036
Telephone: (212) 775-8700
Facsimile: (212) 775-8800
Email: dposner@kilpatricktownsend.com
gfinizio@kilpatricktownsend.com
kmoynihan@kilpatricktownsend.com

*Counsel to the Official Committee of Unsecured
Creditors*

EXHIBIT A**Summary of Billing by Professional**

Name of Attorney of Other Professional	Year Admitted to Practice	Hourly Rate	Hours Billed	Total Fees
Gianfranco Finizio	2009	\$795.00	56.7	\$45,076.50
David M. Posner	1989	\$1,240.00	29.0	\$35,960.00
Danielle Barav-Johnson	2014	\$695.00	21.6	\$15,012.00
Kelly Moynihan	2016	\$590.00	53.1	\$31,329.00
James R. Risener	2020	\$375.00	23.0	\$8,625.00
Cynthia W. Baldwin	2008	\$335.00	3.1	\$697.50
TOTALS			186.5	\$136,700.00

Blended Hourly Rate: \$732.98

EXHIBIT B**Compensation by Project Category**

Project Category	Total Hours	Total Fees
Asset Disposition	3.5	\$2,759.00
Case Administration and Analysis	136.9	\$99,355.50
Lien Investigation	13.2	\$11,350.50
Fee/Employment Applications	11.40	\$6,805.50
Fee/Employment Objections	4.5	\$2,744.50
Financing	4.1	\$3,116.00
Meetings of Creditors	12.9	\$10,569.00
TOTALS	186.5	\$136,700.00



ATTORNEYS AT LAW

Please Remit Payments Only To:

P.O. Box 945614

Atlanta, Georgia 30394

Telephone (866) 244-4934

Payments Only: accountsreceivable@kilpatricktownsend.comBilling Inquiries: financialservices-billingrequests@kilpatricktownsend.com

Fed I.D. 58-0511774

October 8, 2021

TECT OFFICIAL CREDITORS' COMMITTEE
 1738 GENERAL GEORGE PATTON DRIVE
 BRENTWOOD, TN 37027

Client: 107959
 Matter: 1248726
 Invoice #: 12549244

RE: TECT AEROSPACE BANKRUPTCY

For Professional Services Through September 30, 2021:

B110 - Asset Disposition

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/01/2021	GF	Call with D. Posner, K. Moynihan, P. Heath, Z. Shapiro and C. DeLillo regarding possible equipment sale to CKAM (.5); follow up call with K. Moynihan on same (.2).	0.70	556.50
09/01/2021	KM	Call with RLF regarding sale of inventory (.5); call with G. Finizio regarding same (.2); email to C. DeLillo regarding assumed contracts (.2).	0.90	531.00
09/01/2021	DMP	Conference call with RLF regarding inventory disposition.	0.50	620.00
09/03/2021	KM	Review amended assumed contracts (.1); correspondence with C. DeLillo regarding same (.1); email to G. Finizio regarding same (.1).	0.30	177.00
09/08/2021	GF	Emails with C. DeLillo regarding TECT equipment up for auction (.1); diligence on same (.7); email to D. Posner and K. Moynihan regarding equipment diligence (.3).	1.10	874.50
Task Subtotal			3.50	2,759.00

Amounts are calculated per entry, rounding discrepancies may occur in summaries or totals as a result of prearranged discounts.

Due and Payable upon receipt. 1% interest per month charged on balances after 30 days.

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/01/2021	DB	Emails with G. Finizio, K. Moynihan regarding review of conversion motion (.2); review resources regarding conversion and applicable law (.8).	1.00	695.00
09/01/2021	GF	Review (.6) and revise draft motion to convert cases to chapter 7 (2.6); call with K. Moynihan on motion to convert (.1); emails with D. Barav-Johnson on motion to convert (.1).	3.40	2,703.00
09/01/2021	KM	Draft conversion motion (2.9); correspondence with G. Finizio regarding same (.1); correspondence with J. Risener regarding conversion research (.2); review same (.2); call with G. Finizio regarding conversion motion (.3); review revisions to conversion motion (.1); revise conversion motion (1.7); correspondence with G. Finizio regarding same (.4); correspondence with D. Barav-Johnson regarding conversion (.2).	6.10	3,599.00
09/01/2021	JRR	Research regarding courts' interpretation of gross mismanagement under section 1112(b).	5.00	1,875.00
09/02/2021	DB	Review and revise motion to convert case to chapter 7 (7.3); call with K. Moynihan regarding same (.7); emails with K. Moynihan, J. Risener regarding research for same (.6); review research for same (.5).	9.10	6,324.50
09/02/2021	GF	Calls with K. Moynihan regarding conversion motion (.3); review draft of conversion motion (.5) and prepare edits to same (1.6); emails with K. Moynihan and D. Barav-Johnson on same (.1).	2.50	1,987.50
09/02/2021	KM	Correspondence with D. Barav-Johnson regarding conversion motion (.6); correspondence with J. Risener regarding same (.4); call with D. Barav-Johnson regarding same (.7); review D. Barav-Johnson revisions to same (.3); call with G. Finizio regarding same (.2); research regarding conversion (.9); call with G. Finizio regarding conversion motion (.1); draft conversion motion (.2).	3.40	2,006.00
09/02/2021	JRR	Research regarding substantial or continuing loss under section 1112(b) (1.4); assist further in drafting (.3), editing (.2), and researching (3.4) for conversion motion.	5.30	1,987.50
09/03/2021	DB	Review and revise motion to convert case to chapter 7 (2.2); call with G. Finizio regarding same (.3); emails with K. Moynihan, J. Risener regarding same (.5); emails with G. Finizio regarding same (.2); email with D. Posner regarding same (.1).	3.30	2,293.50

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/03/2021	GF	Prepare additional revisions to draft conversion motion (.9); call with K. Moynihan on same (.1); call with D. Barav-Johnson on same (.3).	1.30	1,033.50
09/03/2021	KM	Review revisions to conversion motion (.4); correspondence with G. Finizio, D. Barav-Johnson and J. Risener regarding same (.8); draft revisions to same (.8); call with J. Risener regarding conversion motion issues (.5); call with G. Finizio regarding same (.1); review and analyze J. Risener MOR analysis (.1).	2.70	1,593.00
09/03/2021	JRR	Review Debtors' monthly operating reports (2.1); prepare cash flow and income spreadsheet based on same for conversion motion purposes (1.2); call with K. Moynihan on conversion motion (.5).	3.80	1,425.00
09/05/2021	GF	Email to D. Posner and K. Moynihan on case strategy/next step.	0.30	238.50
09/05/2021	KM	Revise conversion motion (.6); correspondence with D. Posner and G. Finizio regarding case status (.1).	0.70	413.00
09/05/2021	DMP	Correspondence with G. Finizio and K. Moynihan regarding pending matters and case strategy (.2); review and edit draft of conversion motion (.7).	0.90	1,116.00
09/06/2021	GF	Review D. Posner edits to conversion motion (.3); prepare additional updates to motion (1.4); email to D. Posner and K. Moynihan regarding draft motion and next steps (.2); review further revised draft of conversion motion (.2).	2.10	1,669.50
09/06/2021	KM	Revise conversion motion (.1); email to D. Posner and G. Finizio regarding same (.2); review revisions to conversion motion (.2); email to Womble and Province regarding same (.4); correspondence with G. Finizio regarding settlement (.1).	1.00	590.00
09/06/2021	DMP	Review revised conversion motion (.2); correspondence with G. Finizio, K. Moynihan and D. Barav-Johnson regarding same (.2).	0.40	496.00
09/07/2021	CWB	Prepare cite check for conversion motion.	3.10	697.50
09/07/2021	DB	Review comments from M. Patterson to TECT conversion motion (.1); email with G. Finizio and K. Moynihan regarding same (.1); review emails from Committee professionals regarding conversion motion (.1).	0.30	208.50

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/07/2021	GF	Call with D. Posner on case strategy (.1); review M. Patterson edits to conversion motion (.2); review further revised motion to convert (.4); emails with Province on data needed for conversion motion (.2); review additional cases to add for conversion motion (.4).	1.30	1,033.50
09/07/2021	KM	Correspondence with D. Posner and G. Finizio regarding conversion strategy (.1); review Womble conversion motion edits (.1); correspondence with G. Finizio, D. Barav-Johnson and J. Risener regarding same (.3); revise conversion motion (.2); review revisions to same (.2).	0.90	531.00
09/07/2021	DMP	Review WBD comments to conversion motion (.1); call with G. Finizio on case strategy (.1).	0.20	248.00
09/07/2021	JRR	Revise conversion motion to address comments from Womble and D. Barav-Johnson.	0.90	337.50
09/08/2021	DB	Review emails from H. Foard, G. Finizio regarding conversion motion (.1); email with G. Finizio regarding same (.1); review edits to conversion motion from G. Finizio (.8); review and revise same (1.2); email with G. Finizio, K. Moynihan regarding same (.5); analyze proposed budget to inform same (.2).	2.90	2,015.50
09/08/2021	GF	Call with D. Posner on case strategy (.3); call with K. Moynihan on strategy (.3); prepare updates to motion to convert following committee call (1.3); review email from H. Foard with data points for conversion motion (.2); review D. Barav-Johnson email with comments to conversion motion (.2) and respond to same (.2); emails with D. Barav-Johnson regarding contract assumptions and revisions to conversion motion to address same (.1); review J. Risener analysis of operating reports regarding negative cash flow argument in conversion motion (.3).	2.80	2,226.00
09/08/2021	KM	Correspondence with G. Finizio and H. Foard regarding conversion motion (.5); review Final DIP Order regarding effects of conversion on chapter 7 trustee (.2); email to G. Finizio regarding same (.1); call with D. Posner and G. Finizio regarding case status (.3); call with G. Finizio regarding conversion motion (.3); correspondence with G. Finizio and D. Barav-Johnson regarding conversion motion (.3); review revisions (.3).	2.00	1,180.00

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/08/2021	DMP	Telephone call with P. Heath regarding case issues and trajectory (.5); conference call with G. Finizio and K. Moynihan regarding same (.3).	0.80	992.00
09/09/2021	DB	Review emails from G. Finizio, D. Posner, H. Foard regarding conversion motion and administrative expenses (.4); review edits to same (.4); review and revise same (1.1); email with G. Finizio regarding same (.3); email with G. Finizio, D. Posner regarding same (.2).	2.40	1,668.00
09/09/2021	GF	Emails with M. Patterson and D. Posner on hearing date for conversion motion (.1); review D. Barav-Johnson edits to conversion motion (.3); prepare revisions to motion to convert (1.7); review citation edits to motion to convert (.1); emails with H. Foard and S. Kietlinski regarding comments to conversion motion (.3) correspondence with D. Posner and K. Moynihan on conversion motion (.1); emails with J. Mullen regarding case status (.2).	2.80	2,226.00
09/09/2021	KM	Review and analysis of conversion motion with G. Finizio (.4); correspondence with J. Risener regarding conversion motion revisions (.2); research regarding conversion motion (.5); review and analysis of case status with D. Posner and G. Finizio (.4); correspondence regarding conversion hearing (.1); correspondence from G. Finizio, S. Kietlinski and H. Foard regarding conversion motion (.2).	1.80	1,062.00
09/09/2021	DMP	Review and edit conversion motion (.5); review and analysis with G. Finizio and K. Moynihan of issues with respect to conversion motion (.4); correspondence with Province regarding data and issues for conversion motion (.4).	1.30	1,612.00
09/09/2021	JRR	Update citations in conversion motion (1.3); review negative treatment of cited cases (2.2).	3.50	1,312.50

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/10/2021	DB	Review conversion motion filed in similar case to inform Committee's conversion motion (.4); emails with J. Risener regarding research for same (.3); emails with G. Finizio regarding same (.2); review and revise Committee's conversion motion (.7); review emails from G. Finizio, D. Posner, Province regarding same (.3); email with D. Posner, G. Finizio regarding same (.1); review email from Committee member regarding same (.1); review emails from G. Finizio, M. Patterson, M. Ward regarding filing of same and hearing on same (.2).	2.30	1,598.50
09/10/2021	GF	Review final draft of conversion motion prior to filing same (.8); review final citation additions from D. Barav-Johnson (.3); call with D. Posner and K. Moynihan regarding conversation with A. Smith (.3); review D. Posner edits to latest draft of motion (.2); prepare email to committee regarding filing of motion (.3); emails with D. Posner and S. Kietlinski regarding redaction of confidential information in motion (.2); follow up email to H. Retra on same (.1); emails with Womble Bond team regarding filing of conversion motion (.1).	2.30	1,828.50
09/10/2021	KM	Correspondence regarding conversion motion (.3); revise conversion motion (.2); call with G. Finizio and D. Posner regarding conversion motion (.3); review conversion motion (.7).	1.50	885.00
09/10/2021	DMP	Review and edit conversion motion (.5); correspondence between and among committee professionals regarding conversion motion (.9); telephone call with A. Smith regarding settlement and conversion motion (.5); telephone call with G. Finizio and K. Moynihan regarding conversion motion (.3); telephone call with P. Heath regarding conversion motion (.2).	2.40	2,976.00
09/10/2021	JRR	Review cited case law to confirm support for conversion motion arguments (.9); research regarding unusual circumstances under section 1112 of the Bankruptcy Code (.2).	1.10	412.50
09/13/2021	GF	Prepare edits to draft email from creditor regarding conversion motion.	0.20	159.00
09/13/2021	KM	Draft email to creditor regarding claim payment (.3); review revised email (.1).	0.40	236.00

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/14/2021	GF	Call with P. Heath and D. Posner regarding conversion motion resolution possibilities (.3); confer with D. Posner and K. Moynihan regarding update on conversion motion (.1); prepare update to Womble and Province teams on conversion motion (.3).	0.70	556.50
09/14/2021	DMP	Conference call with P. Heath and G. Finizio regarding conversion motion and settlement construct (.3); follow-up call with P. Heath regarding same (.1).	0.40	496.00
09/15/2021	DB	Review emails from G. Finizio, D. Posner regarding status of negotiations with Boeing and Debtors.	0.10	69.50
09/15/2021	GF	Call with D. Posner regarding status call with P. Heath (.2); email to Womble and Province teams regarding P. Heath proposal (.2).	0.40	318.00
09/15/2021	KM	Review and analyze emails from D. Posner and G. Finizio regarding case status call with P. Heath.	0.20	118.00
09/15/2021	DMP	Telephone call with P. Heath regarding settlement (.2); telephone call with G. Finizio regarding same (.2); correspondence with Committee professionals regarding same (.2).	0.60	744.00
09/16/2021	DB	Review emails from Committee professionals regarding communications with Committee regarding status of negotiations.	0.20	139.00
09/16/2021	GF	Review draft email to committee regarding settlement discussions (.1) and email to D. Posner with suggestions to same (.1); review draft email to P. Heath regarding settlement matters (.2).	0.40	318.00
09/16/2021	KM	Review correspondence from P. Heath and D. Posner regarding settlement.	0.10	59.00
09/16/2021	DMP	Correspondence with Womble team, A. Smith and RLF regarding conversion motion, settlement and challenge extension.	0.60	744.00
09/17/2021	DMP	Telephone call with P. Heath regarding conversion motion and settlement.	0.30	372.00
09/20/2021	KM	Call with D. Posner regarding adjournment of conversion motion (.1); review email from A. Smith regarding same (.1); correspondence with L. Tancredi regarding same (.2); correspondence with D. Posner regarding same (.1).	0.50	295.00

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/20/2021	DMP	Correspondence with A. Smith regarding adjournments and meeting (.1); telephone call with K. Moynihan regarding adjourning conversion motion (.1).	0.20	248.00
09/21/2021	GF	Correspondence with D. Posner regarding settlement meeting logistics (.2); emails to S. Kietlinski and Womble team regarding meeting logistics (.2).	0.40	318.00
09/21/2021	KM	Correspondence with D. Posner, G. Finizio, and S. Kietlinski regarding settlement conference.	0.10	59.00
09/21/2021	DMP	Telephone call with A. Smith regarding settlement meeting (.2); telephone call with G. Finizio regarding same (.2); correspondence with G. Finizio and K. Moynihan regarding same (.2).	0.60	744.00
09/22/2021	GF	Email to Womble and Province teams regarding settlement meeting on September 29 (.2); email to D. Posner regarding meeting logistics (.1); review emails regarding deadlines related to settlement meeting (.1); review prior settlement term materials to prepare for 9/29 settlement meeting (.5).	0.90	715.50
09/22/2021	KM	Correspondence from D. Posner, G. Finizio, M. Ward and S. Kietlinski regarding settlement conference.	0.30	177.00
09/22/2021	DMP	Correspondence with Committee professionals regarding settlement meeting.	0.10	124.00
09/23/2021	GF	Correspondence with D. Posner regarding settlement meeting matters (.3); emails with D. Posner and K. Moynihan regarding SPEF request for extended objection deadline (.1); analysis of potential settlement constructs (.9); review upcoming case deadlines (.1).	1.40	1,113.00
09/23/2021	KM	Correspondence with G. Finizio regarding NWI conversion objection deadline.	0.20	118.00
09/23/2021	DMP	Telephone call with P. Heath regarding settlement and conversion motion (.4); correspondence with B. Price regarding conversion motion and objection deadline (.2); correspondence with G. Finizio and K. Moynihan regarding same (.2).	0.80	992.00
09/23/2021	JRR	Update critical dates calendar.	0.10	37.50
09/24/2021	GF	Emails with D. Posner and C. DeLillo regarding 9/29 meeting logistics (.1); email to D. Posner and K. Moynihan regarding settlement constructs (.1).	0.20	159.00
09/24/2021	KM	Calendar upcoming dates.	0.10	59.00

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/24/2021	KM	Correspondence from D. Posner and G. Finizio regarding settlement conference.	0.20	118.00
09/27/2021	GF	Emails with Womble and Province teams regarding 9/29 settlement meeting preparations (.1); review budget through 12/31 regarding settlement meeting analyses (.3); review challenge complaint regarding settlement meeting prep (.3).	0.70	556.50
09/27/2021	KM	Correspondence with UCC professionals and RLF regarding settlement meeting.	0.30	177.00
09/28/2021	GF	Prepare for September 29 settlement meeting (.5); review RLF presentation materials for settlement meeting (.3).	0.80	636.00
09/28/2021	KM	Review settlement materials (.3); correspondence with G. Finizio regarding same (.1).	0.40	236.00
09/28/2021	DMP	Review and analysis of financial analysis received from RLF.	0.30	372.00
09/29/2021	GF	Prepare for settlement meeting with Debtors and Boeing (.4); strategy call with Province, Womble, D. Posner and K. Moynihan to prepare for settlement meeting (.8); participate in settlement meeting (7.5); emails to D. Posner and K. Moynihan regarding report to committee on settlement status (.2).	8.90	7,075.50
09/29/2021	KM	Review Boeing term sheet (.2); settlement strategy call with committee professionals (.8); attend settlement conference (7.5).	8.50	5,015.00
09/29/2021	DMP	Review and analysis of debtors' spreadsheet to prepare for settlement meeting (.5); committee professionals call to prepare for settlement meeting (.8); attend settlement meeting with Boeing and the Debtors (7.5).	8.80	10,912.00
09/30/2021	GF	Analysis of Boeing counter-proposal (.5); call with S. Kietlinski on same (.1); calls with D. Posner (.3) and K. Moynihan (.2) on same; emails to D. Posner and K. Moynihan regarding Boeing treatment of professional fees (.3); review marked term sheet from K. Moynihan (.2) and prepare updates to same (.3).	1.90	1,510.50
09/30/2021	KM	Review Boeing revised settlement offer (.3); revise same (2.2); correspondence from D. Posner, G. Finizio and S. Kietlinski regarding same (.2); calls with G. Finizio regarding same (.6).	3.30	1,947.00

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/30/2021	DMP	Review Boeing settlement proposal (.3); review and analysis of settlement positions and possible counters (.8); telephone call with P. Heath regarding settlement (.3); telephone calls (x2) with A. Smith regarding settlement (.6); telephone calls (x3) with G. Finizio regarding settlement (1.2); telephone call with S. Kietlinski regarding settlement (.2).	3.40	4,216.00
Task Subtotal			136.90	99,355.50

B141 - Lien Investigation

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/08/2021	DMP	Review equipment for auction against equipment that is subject of lien challenge (.3); correspondence with G. Finizio and K. Moynihan regarding lien challenge (.4); correspondence with WBD regarding lien challenge and legal issues regarding same (.3).	1.00	1,240.00
09/09/2021	KM	Email from L. Tancredi regarding complaint.	0.10	59.00
09/09/2021	DMP	Correspondence with L. Tancredi, G. Finizio and K. Moynihan regarding lien challenge and legal strategy therewith.	0.30	372.00
09/10/2021	KM	Correspondence from D. Posner, M. Ward and L. Tancredi regarding standing complaint.	0.10	59.00
09/10/2021	DMP	Review draft of challenge complaint (.4); correspondence with G. Finizio regarding complaint (.2).	0.60	744.00
09/11/2021	GF	Preliminary review of complaint for unencumbered equipment (.8); and email to L. Tancredi with comments on same (.4).	1.20	954.00
09/11/2021	KM	Correspondence form G. Finizio regarding standing motion.	0.10	59.00
09/13/2021	GF	Prepare additional revisions to draft lien challenge complaint.	2.40	1,908.00
09/14/2021	GF	Review draft standing motion (.7); prepare revisions to same (2.0); emails with M. Patterson and L. Tancredi on same (.1).	2.80	2,226.00
09/14/2021	DMP	Review draft of standing motion (.4); correspondence with G. Finizio, K. Moynihan and Womble team regarding conversion motion (.2).	0.60	744.00

B141 - Lien Investigation

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/15/2021	GF	Analysis of updated standing motion (.5); prepare additional revisions to draft standing motion (.8) and complaint (.4); emails with M. Ward on same (.1); review revised standing motion (.3).	2.10	1,669.50
09/15/2021	KM	Review standing motion (.5); review revisions to same (.2); revise same (.2); correspondence with D. Posner, G. Finizio and L. Tancredi regarding same (.2).	1.10	649.00
09/15/2021	DMP	Review standing motion.	0.30	372.00
09/16/2021	KM	Review challenge stipulation (.2); correspondence with D. Posner and L. Tancredi regarding same (.2); correspondence from L. Tancredi, P. Heath and A. Smith regarding same (.1).	0.50	295.00
Task Subtotal			13.20	11,350.50

B160 - Fee/Employment Applications

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/06/2021	GF	Emails with K. Moynihan on interim fee applications.	0.10	79.50
09/06/2021	KM	Correspondence with G. Finizio regarding interim fee apps (.3); email to J. Risener regarding same (.1); email to Province regarding same (.1); revise interim fee application (3.3).	3.80	2,242.00
09/07/2021	GF	Call with K. Moynihan on interim fee application.	0.20	159.00
09/07/2021	KM	Correspondence with G. Finizio regarding interim fee application (.2); revise same (.1); call with G. Finizio regarding same (.3); draft email to Womble regarding interim fee applications (.1); correspondence with S. Kietlinski regarding same (.1).	0.80	472.00
09/07/2021	DMP	Review draft of First Interim Application.	0.30	372.00
09/09/2021	GF	Correspondence with K. Moynihan regarding interim fee applications.	0.10	79.50
09/09/2021	KM	Correspondence with G. Finizio regarding interim fee applications (.2); email to J. Mullen and B. Lacey regarding same (.1); correspondence with M. Patterson regarding same (.1); review Womble interim fee application (.1); revise KTS interim fee application (.2)	0.70	413.00
09/13/2021	KM	Email to Province regarding interim fee applications.	0.10	59.00

B160 - Fee/Employment Applications

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/14/2021	KM	Review Province interim fee application (.4); correspondence with S Kietlinski regarding same (.1); correspondence with M. Patterson regarding interim fee applications (.1); revise KTS interim fee application (.2).	0.80	472.00
09/16/2021	KM	Correspondence with L. Casey regarding interim fee applications (.2); correspondence from G. Finizio regarding monthly fee statement (.1).	0.30	177.00
09/16/2021	JRR	Draft August monthly fee application.	2.00	750.00
09/17/2021	GF	Review draft of August monthly statement.	0.10	79.50
09/17/2021	KM	Correspondence with J. Risener regarding fee applications (.1); correspondence with G. Finizio regarding August fee app (.1).	0.20	118.00
09/20/2021	DMP	Correspondence with K. Moynihan regarding interim fee applications adjournment and objection deadline.	0.10	124.00
09/21/2021	GF	Review proposed revisions to Province monthly fee application.	0.10	79.50
09/21/2021	KM	Revise Province fee application (.3); revise KTS fee application (.2).	0.50	295.00
09/22/2021	GF	Review KTS August monthly (.1) and prepare revisions to same (.1); review Womble fee statement for August (.1).	0.30	238.50
09/22/2021	KM	Finalize 5th monthly fee statement (.4); emails with D. Posner, G. Finizio and M. Patterson regarding same (.2); review Province prior fee statements (.2).	0.80	472.00
09/22/2021	DMP	Review draft of fifth monthly application.	0.10	124.00
		Task Subtotal	11.40	6,805.50

B170 - Fee/Employment Objections

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/02/2021	KM	Call with G. Finizio regarding Province fee analysis (.2); review same (.2).	0.40	236.00
09/03/2021	GF	Overview of Boeing analysis of professional fees.	0.30	238.50
09/05/2021	KM	Email from G. Finizio regarding Province fees.	0.10	59.00

B170 - Fee/Employment Objections

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/09/2021	GF	Call with D. Posner regarding Imperial final fee application.	0.10	79.50
09/14/2021	GF	Emails with D. Posner regarding Imperial final fee application.	0.10	79.50
09/15/2021	GF	Emails with J. Risener regarding Imperial final fee application (.2) and emails with S. Kietlinski on same (.2); review J. Risener analysis of Imperial fees (.1).	0.50	397.50
09/15/2021	KM	Correspondence from D. Posner, G. Finizio, J. Risener and S. Kietlinski regarding Imperial final fee app.	0.30	177.00
09/15/2021	JRR	Review Imperial final fee application.	1.30	487.50
09/20/2021	GF	Email to D. Posner and S. Kietlinski regarding Imperial final fee request.	0.10	79.50
09/20/2021	KM	Correspondence from D. Posner and S. Kietlinski regarding Imperial's fees.	0.20	118.00
09/21/2021	GF	Review Imperial retention order regarding final fee request (.2); revise draft email to Heath regarding Imperial final fee application (.2).	0.40	318.00
09/21/2021	KM	Email to P. Heath regarding Imperial fees.	0.30	177.00
09/22/2021	GF	Emails with K. Moynihan regarding Province August monthly.	0.10	79.50
09/27/2021	GF	Emails with D. Posner regarding status of Imperial final fees (.1); review UCC professional fee analysis from K. Moynihan (.1).	0.20	159.00
09/27/2021	KM	Correspondence from G. Finizio regarding Imperial fee application objection.	0.10	59.00
		Task Subtotal	4.50	2,744.50

B180 - Financing

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/08/2021	GF	Call with L. Tancredi regarding challenge period provision in DIP order and impact of conversion (.2); review DIP order on same (.5); analysis of DIP budgets regarding arguments for conversion motion (.3).	1.00	795.00
09/21/2021	GF	Review Interim DIP budget maturity.	0.10	79.50

B180 - Financing

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/22/2021	GF	Review status of next interim DIP budget and email to D. Posner on same.	0.10	79.50
09/24/2021	GF	Review K. Moynihan email regarding extended DIP documentation (.1); emails to D. Posner, K. Moynihan and C. DeLillo regarding DIP maturity date (.2); call with Z. Shapiro regarding DIP maturity date (.1); email to D. Posner regarding call with Z. Shapiro (.1); report to Womble team regarding DIP maturity date (.2); review DIP budget through 12/31 (.5) and email to Province regarding same (.1); review as-filed certification of counsel for DIP maturity date (.1).	1.30	1,033.50
09/24/2021	KM	Review CoC and DIP amendment order (.2); correspondence with D. Posner and G. Finizio regarding same (.2); email from G. Finizio regarding dip budget (.1).	0.50	295.00
09/25/2021	GF	Continue review of long term DIP budget regarding questions for 9/29 settlement meeting.	0.30	238.50
09/26/2021	KM	Email from S. Kietlinski regarding DIP.	0.10	59.00
09/27/2021	GF	Review budget analysis from Province (.4); prepare email response to S. Kietlinski regarding same (.2).	0.60	477.00
09/27/2021	KM	Email from S. Kietlinski regarding DIP budget.	0.10	59.00
Task Subtotal			4.10	3,116.00

B200 - Meetings of Creditors

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/01/2021	GF	Emails with H. Retra regarding next committee call.	0.10	79.50
09/05/2021	KM	Draft 9/8 agenda.	0.20	118.00
09/06/2021	GF	Review draft agenda and email to K. Moynihan on same.	0.10	79.50
09/06/2021	KM	Revise agenda (.1); correspondence with D. Posner and G. Finizio regarding same (.1).	0.20	118.00
09/06/2021	DMP	Review draft of agenda for committee meeting (.1); correspondence with G. Finizio and K. Moynihan regarding same (.1).	0.20	248.00

B200 - Meetings of Creditors

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/07/2021	GF	Emails with K. Moynihan on presentation materials for September 8 committee call (.2); review draft committee email (.1); review final draft of conversion motion for committee (.6).	0.90	715.50
09/07/2021	KM	Correspondence with D. Posner and G. Finizio regarding agenda (.2); revise agenda (.2); prepare materials for 9/8 call (.1); email to committee regarding 9/8 call (.2).	0.70	413.00
09/07/2021	DMP	Review revised agenda (.1); correspondence with G. Finizio and K. Moynihan regarding draft of agenda (.1).	0.20	248.00
09/08/2021	GF	Prepare for committee call (.3); participate on committee call (.7).	1.00	795.00
09/08/2021	KM	Committee call (.7); correspondence from D. Posner and G. Finizio regarding same (.2); draft minutes (.2).	1.10	649.00
09/08/2021	DMP	Prepare for Committee meeting (.3); committee meeting (.7).	1.00	1,240.00
09/09/2021	GF	Review (.1) and revise (.1) minutes from September 8 committee call.	0.20	159.00
09/13/2021	GF	Emails with D. Posner regarding necessity for September 15 committee call.	0.10	79.50
09/13/2021	KM	Correspondence from D. Posner and G. Finizio regarding 9/15 call.	0.10	59.00
09/14/2021	GF	Review committee email on case update (.1) and prepare revisions to same (.2).	0.30	238.50
09/14/2021	KM	Draft email to the committee regarding 9/15 call (.3); revise same (.1).	0.40	236.00
09/14/2021	DMP	Review and edit draft of report to Committee regarding conversion motion and standing motion.	0.20	248.00
09/15/2021	KM	Email to committee regarding new filings.	0.10	59.00
09/16/2021	KM	Email to committee regarding settlement (.2); review email from D. Posner to committee (.1); correspondence from G. Finizio and S. Kietlinski regarding same (.1).	0.40	236.00
09/16/2021	DMP	Draft and edit email to Committee regarding settlement posture.	0.50	620.00

B200 - Meetings of Creditors

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
09/21/2021	KM	Email to committee regarding 9/29 call (.1); correspondence from G. Finizio regarding same (.1).	0.20	118.00
09/22/2021	GF	Email to committee regarding next Committee call (.2); review scheduling matters for next call (.1).	0.30	238.50
09/22/2021	KM	Email to committee regarding 9/29 call.	0.10	59.00
09/24/2021	GF	Review agenda matters for 9/29 call.	0.10	79.50
09/24/2021	KM	Correspondence from D. Posner and G. Finizio regarding committee call.	0.10	59.00
09/27/2021	GF	Emails with K. Moynihan regarding next committee call.	0.10	79.50
09/27/2021	KM	Email to Committee regarding 9/29 call (.1); correspondence with G. Finizio regarding same (.1).	0.20	118.00
09/30/2021	GF	Pre-committee call with Committee professionals (.3); participate on committee call (.7); follow up call with committee chairperson (.1); email report regarding call with chairperson (.2); revise 9/30 minutes (.1).	1.40	1,113.00
09/30/2021	KM	Correspondence with UCC professionals regarding prep call (.1); email to Committee regarding 9/30 call (.1); prep call with UCC professionals for committee call (.3); committee call (.7); draft minutes (.1); email from G. Finizio regarding call with J. Mullen (.1).	1.40	826.00
09/30/2021	DMP	Professionals call to prepare for committee meeting (.3); committee meeting (.7).	1.00	1,240.00
		Task Subtotal	12.90	10,569.00
Total Fees				\$136,700.00

Task Code Summary

<i>Task Code</i>	<i>Task Description</i>	<i>Amount</i>
B110	Asset Disposition	2,759.00
B130	Case Administration and Analysis	99,355.50
B141	Lien Investigation	11,350.50
B160	Fee/Employment Applications	6,805.50

Task Code Summary

<i>Task Code</i>	<i>Task Description</i>	<i>Amount</i>
B170	Fee/Employment Objections	2,744.50
B180	Financing	3,116.00
B200	Meetings of Creditors	10,569.00
Total		\$136,700.00

<i>Summary</i>	<i>Timekeeper Name</i>	<i>Hours</i>	<i>Rate/Hour</i>	<i>Amount</i>
GF	Gianfranco Finizio	56.70	795.00	45,076.50
DMP	David Posner	29.00	1,240.00	35,960.00
DB	Danielle Barav-Johnson	21.60	695.00	15,012.00
KM	Kelly Moynihan	53.10	590.00	31,329.00
JRR	James Risener	23.00	375.00	8,625.00
CWB	Cynthia W. Baldwin	3.10	225.00	697.50
Totals		186.50		\$136,700.00

Other Charges:

09/01/2021	Westlaw On-Line Legal Research	258.96
09/02/2021	Westlaw On-Line Legal Research	20.64
09/02/2021	Westlaw On-Line Legal Research	135.12
09/08/2021	Westlaw On-Line Legal Research	38.16
09/10/2021	Westlaw On-Line Legal Research	294.00
09/10/2021	Westlaw On-Line Legal Research	20.64
09/22/2021	Travel and Ground Transportation - Internet Expense of Gianfranco Finizio on 09/22/21 - Gogo Receipt - In-Flight Wifi to Attend to Time Sensitive Emails.	6.00
Total Other Charges		\$773.52

TOTAL AMOUNT DUE THIS INVOICE

\$137,473.52

EXHIBIT C

Expense Summary

Expense Category	Total Expenses
Westlaw On-Line Legal Research	\$767.52
Travel and Ground Transportation - In-Flight Wifi to Attend to Time Sensitive Emails	\$6.00
TOTALS	\$773.52

EXHIBIT D

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

TECT AEROSPACE GROUP
HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 21-10670 (KBO)
)
) (Jointly Administered)
)
) **Obj. Deadline: November 10, 2021 at 4:00 p.m. (ET)**

**DECLARATION OF DAVID M. POSNER IN SUPPORT OF SIXTH
MONTHLY APPLICATION OF KILPATRICK TOWNSEND & STOCKTON
LLP FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES AS COUNSEL FOR THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR THE PERIOD FROM
SEPTEMBER 1, 2021 THROUGH AND INCLUDING SEPTEMBER 30, 2021**

I, David M. Posner, under penalty of perjury, declare as follows:

1. I am a partner in the firm of Kilpatrick Townsend & Stockton LLP (“Kilpatrick Townsend”), counsel to the Official Committee of Unsecured Creditors (the “Committee”).

2. I have read the foregoing *Sixth Monthly Application of Kilpatrick Townsend & Stockton LLP for Allowance of Compensation and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from September 1, 2021 through and including September 30, 2021* and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally performed many of the legal services rendered by Kilpatrick Townsend and am thoroughly familiar with all other work

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.

performed on behalf of the Committee by the attorneys and paraprofessionals in Kilpatrick Townsend.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of the Title 11, United States Code, no agreement or understanding exists between Kilpatrick Townsend and any other person for the sharing of compensation to be received in connection with the above-captioned cases.

4. I have reviewed the requirements of Local Rule 2016-2 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief, this Application complies with Local Rule 2016-2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 20, 2021

/s/ David M. Posner

David M. Posner

CERTIFICATE OF SERVICE

I, Christopher A. Lewis, certify that I am not less than 18 years of age, and that on October 20, 2021, a copy of the foregoing document was electronically filed via CM/ECF and served via CM/ECF upon all parties registered to receive CM/ECF notices in these cases, and I caused copies to be served upon the following persons via U.S. first-class mail, postage fully pre-paid:

TECT AEROSPACE GROUP HOLDINGS, INC.
c/o Conway MacKenzie, LLC
Attn: Shaun Martin
265 Franklin Street, Suite 1004
Boston, MA 02110

PERKINS COIE LLP
Attn: Alan D. Smith, Esq.
1201 Third Avenue, Suite 4900
Seattle, Washington 98101

RICHARDS, LAYTON & FINGER, P.A.
Attn: Daniel DeFranceschi, Esq.
Attn: Paul N. Heath, Esq.
Attn: Amanda R. Steele, Esq.
One Rodney Square
910 N. King Street
Wilmington, Delaware 19801

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Attn: Kenneth J. Enos, Esq.
1000 North King Street
Wilmington, Delaware 19801

OFFICE OF THE UNITED STATES TRUSTEE
FOR THE DISTRICT OF DELAWARE
Attn: Linda Casey, Esq.
844 King Street, Suite 2207, Lockbox #35
Wilmington, Delaware 19801

Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: October 20, 2021

/s/ Christopher A. Lewis
Christopher A. Lewis