

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

TECT AEROSPACE GROUP  
HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)  
) Case No. 21-10670 (KBO)  
)  
) (Jointly Administered)  
)  
) Related Docket No.: 548

JOINDER OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS TO 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

The Official Committee of Unsecured Creditors (the “Committee”) of TECT Aerospace Group Holdings, Inc., and its affiliated debtors and debtors-in-possession in the above captioned chapter 11 cases (collectively, the “Debtors”), by and through its undersigned counsel, hereby submits this joinder (the “Joinder”) in support of the *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] (the “Motion”). In support of this Joinder, the Committee respectfully states as follows:

**JOINDER**

1. The Committee joins in the relief sought by the Debtors in the Motion to extend the Debtors time to assume or reject unexpired leases of nonresidential real property through and including January 30, 2022.

<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 TECT Aerospace Group Holdings, Inc., c/o Conway MacKenzie, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.



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2. The assets associated with the Debtors' Kansas operations are currently being operated by Central Kansas Aerospace Manufacturing, LLC ("CKAM"), which purchased the assets as part of a sale that was previously approved by this Court on July 13, 2021 [D.I. 372]. CKAM currently operates the Debtors' Kansas assets out of two manufacturing facilities located in Park City and Wellington, Kansas (the "Facilities"), which are subject to unexpired leases (the "Unexpired Leases") with lessors Utica Realty Park City, LLC and Utica Realty Wellington, LLC.

3. In part due to CKAM's operations of the Facilities, the Debtors have been able to convert owned inventory into cash for the estates, and are continuing to do so. Absent the continued operation of the Facilities, the Debtors' remaining raw inventory would have little to no value. An extension of the Debtors' time to determine whether to assume or reject the Unexpired Leases will allow the Debtors to, among other things, continue to convert its remaining assets into cash, which proceeds can be used to pay down the prepetition secured claims and DIP financing claims held by The Boeing Company (in accordance with the Final DIP Order), thereby bringing unsecured creditors closer to a recovery in these cases. Any interference with the Unexpired Leases or disruption of operations at the Facilities will impede the Debtors' ability to convert inventory into cash and, as a result, cause harm to the creditor body.

4. In addition, the relief sought in the Motion will provide the Debtors' estates with (i) additional time to market the Unexpired Leases (if the leases are rejected), which efforts, if successful, could result in additional cash proceeds for the estates; and (ii) flexibility in potentially continuing operations at the Facilities long term.

**CONCLUSION**

5. For the foregoing reasons, the Committee respectfully requests that the Court grant the Motion.

Dated: October 21, 2021  
Wilmington, Delaware

Respectfully submitted,

/s/ Morgan L. Patterson

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