

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
TECT Aerospace Group Holdings, Inc.,)	
<i>et al.</i> ,)	
)	
Debtors ¹ .)	Case No. 21-10670 (KBO)
)	
)	(Jointly Administered)
)	
_____)	
)	
UTICA EQUIPMENT FINANCE, LLC,)	
and UTICA REALTY WELLINGTON,)	
LLC,)	
)	
Plaintiffs,)	Adv. Proc. No. 21-51246-KBO
)	
v.)	Related Doc. No.: 1
)	
TECT AEROSPACE WELLINGTON,)	
INC, TECT AEROSPACE KANSAS)	
HOLDINGS, LLC, CENTRAL KANSAS)	
AEROSPACE MANUFACTURING, LLC)	
and THE BOEING COMPANY,)	
)	
Defendants.)	

**PLAINTIFFS’ MOTION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY
INJUNCTION AND POSSESSION PENDING FINAL JUDGMENT**

Plaintiffs Utica Equipment Finance, LLC (“**UEF**”) and Utica Realty Wellington, LLC (“**Utica Realty Wellington**” or the “**Landlord**”), by and through its undersigned counsel, hereby files this Emergency Motion for Temporary Restraining Order, Preliminary Injunction and Possession Pending Final Judgment (the “**Motion**”) against Defendants TECT Aerospace

¹ The Debtors are TECT Aerospace Group Holdings, Inc., TECT Aerospace Kansas Holdings, LLC, TECT Aerospace Holdings, LLC, TECT Aerospace Wellington Inc., TECT Aerospace, LLC, TECT Hypervelocity, Inc. and Sun Country Holdings, LLC.



Wellington, Inc. (“**TAW**”), TECT Aerospace Kansas Holdings, LLC (“**Holdings**”), Central Kansas Aerospace Manufacturing Company, LLC (“**CKAM**”) and The Boeing Corporation (“**Boeing**”) (collectively “**Defendants**”) and in support thereof represents as follows:

1. By and through this Motion, Plaintiffs seek entry of an Order of this Court authorizing Plaintiffs immediate access to the Kansas Facilities² to disassemble and remove the Equipment in an orderly manner.

2. Plaintiffs recognize the operational complexities of removing the Equipment from the Kansas Facilities and intend to do so in a commercially reasonable manner without any disruption to any operations of any of the Defendants.

3. Contemporaneously with the filing of this Motion, Plaintiffs filed the Brief in Support of the Motion (“**Brief in Support**”).

4. Plaintiffs hereby incorporate the Brief in Support by reference, as though such Brief in Support were set forth fully herein.

5. Plaintiffs rely upon the facts and law set forth in the Brief in Support for the approval of this Motion.

6. Plaintiffs respectfully request this Court enter the proposed order attached hereto as Exhibit “1”.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Complaint filed in the instant Adversary Proceeding at Adversary Proceeding No. 21-51246-KBO.

WHEREFORE, Plaintiffs respectfully requests that this Court enter a temporary restraining order and subsequent preliminary injunction enjoining Defendants from damaging, destroying or selling the Equipment and enjoin Defendants from preventing Plaintiffs or their designee(s) from removing the Equipment from the Kansas Facilities and grant such other and further relief as the Court deems just and proper under the circumstances.

Dated: November 5, 2021

Respectfully submitted,

CLARK HILL, PLC

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LLC and Utica Realty Wellington LLC*

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EXHIBIT 1

¹ The Debtors are TECT Aerospace Group Holdings, Inc., TECT Aerospace Kansas Holdings, LLC, TECT Aerospace Holdings, LLC, TECT Aerospace Wellington Inc., TECT Aerospace, LLC, TECT Hypervelocity, Inc. and Sun Country Holdings, LLC.

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**ORDER GRANTING MOTION FOR TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION AND POSSESSION PENDING FINAL JUDGMENT**

Upon consideration of the Motion for Temporary Restraining Order, Preliminary Injunction and Possession Pending Final Judgment (“Motion”), IT IS HEREBY ORDERED, ADJUDGED and DECREED that:

² The Debtors are TECT Aerospace Group Holdings, Inc., TECT Aerospace Kansas Holdings, LLC, TECT Aerospace Holdings, LLC, TECT Aerospace Wellington Inc., TECT Aerospace, LLC, TECT Hypervelocity, Inc. and Sun Country Holdings, LLC.

1. The Motion is GRANTED.
2. UEF and its agents are permitted to enter the Kansas Facilities³ immediately on times and dates mutually agreeable to UEF, Landlord, CKAM and Boeing.
3. UEF is permitted to remove the Equipment from the Kansas Facilities and take full and total possession of the Equipment.
4. UEF and its agents shall provide proof of insurance for any damage that may occur at the Kansas Facilities during the removal process of the Equipment in an amount of at least \$_____.
5. The Defendants shall not damage, destroy or sell the Equipment.
6. The Defendants are hereby enjoined from preventing UEF from implementing the terms of this Order.

³ Capitalized terms not otherwise defined herein shall have the meaning set forth in the Motion.