

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

In re:

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

Debtors.

EQUITY BANK,

Plaintiff,

vs.

TECT AEROSPACE GROUP HOLDINGS, INC.,
et al., THE BOEING COMPANY, CENTRAL
KANSAS AEROSPACE MANUFACTURING,
LLC and HALL INDUSTRIAL SERVICES, INC.,

Defendants.

Chapter 11

Case No. 21-10670 (KBO)

(Jointly Administered)

D.I. 634, 639

Adv. Pro. No. 21-51411 (KBO)

D.I. 1, 2, 6

CERTIFICATION OF COUNSEL

The undersigned counsel for Equity Bank hereby certifies as follows:

On November 23, 2021, the above captioned debtors (the “Debtors”) filed a motion to abandon [Bankr. Docket No. 634] (the “Motion to Abandon”), and on December 7, 2021, Equity Bank filed an objection to the Motion to Abandon [Bankr. Docket No. 639].

On December 16, 2021, the Equity Bank commenced the above-captioned adversary proceeding (the “Adversary Proceeding”) and a Motion for Temporary Restraining Order (the “TRO Motion”) against the Debtors, The Boeing Company, Central Kansas Aerospace Manufacturing, LLC (collectively, the “Purchaser”) and Hall Industrial Services, Inc. (together

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 Riveron RTS, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.



with the Debtors, Equity Bank and the Purchaser, the “Parties”). A hearing to consider the TRO Motion was scheduled for December 17, 2021 at 3:30 p.m.

The Parties have agreed upon a form of order (the “Proposed Order”), a copy of which is attached hereto as Exhibit A, which will (i) withdraw the Motion to Abandon, (ii) withdraw the TRO Motion, and (iii) dismiss Adversary Proceeding.

WHEREFORE, in light of the foregoing, Equity Bank respectfully requests that the Court enter the Proposed Order at the Court’s earliest convenience.

Dated: December 17, 2021

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman
Jeffrey R. Waxman (Bar No. 4159)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: Jwaxman@morrisjames.com

Counsel for Equity Bank

EXHIBIT A

Proposed Order

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

In re:

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

Debtors.

EQUITY BANK,

Plaintiff,

vs.

TECT AEROSPACE GROUP HOLDINGS, INC.,
et al., THE BOEING COMPANY, CENTRAL
KANSAS AEROSPACE MANUFACTURING,
LLC and HALL INDUSTRIAL SERVICES, INC.,

Defendants.

Chapter 11

Case No. 21-10670 (KBO)

(Jointly Administered)

D.I. 634, 639, ____

Adv. Pro. No. 21-51411 (KBO)

D.I. 1, 2, 6, ____

**AGREED UPON ORDER (I) WITHDRAWING DEBTORS' MOTION TO ABANDON,
(II) WITHDRAWING MOTION OF EQUITY BANK FOR ENTRY OF A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION OR ALTERNATIVELY,
FOR IMMEDIATE RELIEF FROM THE AUTOMATIC STAY, AND (III) DISMISSING
ADVERSARY PROCEEDING**

Upon the request of The Boeing Company and Central Kansas Aerospace Manufacturing LLC (collectively the "Purchaser"), TECT Aerospace Group Holdings, Inc., et al. (the "Debtors"), and Equity Bank (together with the Debtors and the Purchaser, the "Parties"), the Court finding that the relief herein is appropriate, it is hereby

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 Riveron RTS, LLC, Attn: Shaun Martin, 265 Franklin Street, Suite 1004, Boston, MA 02110.

ORDERED THAT the Debtors' Motion to Abandon [Bankruptcy Case Docket No. 634] shall be deemed withdrawn as moot, effective immediately, and the Debtors are deemed to have no interest in the Equipment (as such term is defined in the Debtors' Motion to Abandon); and it is further

ORDERED THAT the Motion of Equity Bank for Entry of a Temporary Restraining Order and Preliminary Injunction or Alternatively, for Immediate Relief from the Automatic Stay [Adv. Pro. Docket No. 2] shall be deemed withdrawn, effective immediately; and it is further

ORDERED THAT the above-captioned adversary proceeding shall be deemed dismissed, without prejudice, and the Clerk of the Court is authorized and directed to close the above-captioned adversary proceeding; and it is further

ORDERED THAT, to the extent applicable, the automatic stay is lifted pursuant to 11 U.S.C. § 362(d) to permit Equity Bank or the Purchaser to bring any action against any non-Debtor party related to the Equipment in another court of competent jurisdiction; and it is further

ORDERED THAT this Order shall be effective immediately upon entry.