UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

Chapter 11 In re

TECT AEROSPACE GROUP Case No. 21-10670 (KBO)

HOLDINGS, INC., et al.,

Jointly Administered

Debtors.1

Re: D.I. 666 & 667

Objection Deadline: Jan. 18, 2022 at 4:00 p.m. (ET)

Hearing Date: Jan. 25, 2022 at 2:00 p.m. (ET)

NOTICE OF HEARING TO CONSIDER APPROVAL OF DISCLOSURE STATEMENT FOR JOINT CHAPTER 11 PLAN OF LIQUIDATION FOR TECT AEROSPACE GROUP HOLDINGS, INC. AND ITS AFFILIATED DEBTORS

TO ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE THAT on December 21, 2021, TECT Aerospace Group Holdings, Inc. and its debtor affiliates, as debtors and debtors in possession in the abovecaptioned chapter 11 cases (collectively, the "Debtors") filed the Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors [D.I. 666] (as may be amended, modified, or supplemented in accordance with the terms therein, the "Plan") and the proposed Disclosure Statement for Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors [D.I. 667] (as may be amended, modified, or supplemented, the "Disclosure Statement").2

PLEASE TAKE FURTHER NOTICE THAT:

A hearing (the "Hearing") will be held before the Honorable Karen B. Owens, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), 824 North Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801, on January 25, 2022 at 2:00 p.m. (prevailing Eastern Time), to consider entry of an order determining, among other things, that the Disclosure Statement contains "adequate information" within the meaning ascribed to such term in section 1125 of the

² Capitalized terms used but not defined herein have the meanings given to them in the Plan or the Disclosure Statement, as applicable.



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.

Bankruptcy Code and approving the Disclosure Statement. The Hearing may be conducted virtually, with instructions noted on the hearing agenda filed on the Bankruptcy Court's docket.

- 2. Any party in interest wishing to obtain a copy of the Disclosure Statement and the Plan should contact Kurtzman Carson Consultants LLC, the Debtors' solicitation agent, in writing at TECT Aerospace Group Holdings, Inc., c/o Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245, or by email at TECTAerospaceInfo@kccllc.com. Interested parties may also review the Disclosure Statement and the Plan free of charge at http://www.kccllc.net/tectaerospace. In addition, the Disclosure Statement and Plan are on file with the Bankruptcy Court and may be reviewed by accessing the Bankruptcy Court's website: www.deb.uscourts.gov. Note that a PACER password and login are needed to access documents on the Bankruptcy Court's website. A PACER password can be obtained at: www.pacer.psc.uscourts.gov. Copies of the Disclosure Statement and Plan may also be examined by interested parties during normal business hours at the office of the Clerk of the Bankruptcy Court.
- Objections, if any, to approval of the Disclosure Statement must: (a) be in writing, (b) comply with the Bankruptcy Rules, (c) set forth the name of the objector and the nature and amount of any claim or interest asserted by the objector against or in the Debtors, (d) state with particularity the legal and factual bases for the objection, and (e) be filed, contemporaneously with a proof of service, with the Bankruptcy Court no later than January 18, 2022 at 4:00 p.m. (prevailing Eastern Time), and served on: (i) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, Delaware 19801 (Attn: Linda Casey (Linda. Casey@usdoj.gov)); (ii) counsel for the Debtors, Richards, Layton & Finger, P.A. (Attn: Paul N. Heath (heath@rlf.com) and Zachary I. Shapiro (shapiro@rlf.com)); (iii) counsel to the Creditors' Committee, (A) Kilpatrick Townsend & Stockton LLP (Attn: David M. Posner (dposner@kilpatricktownsend.com) and Gianfranco Finizio (gfinizio@kilpatricktownsend.com)); and (B) Womble Bond Dickinson (US) LLP (Attn: Matthew P. Ward (matthew.ward@wbdus.com) and Morgan L. Patterson (morgan.patterson@wbd-us.com); and (iv) counsel to Boeing, as post-petition lender, (A) Perkins Coie LLP (Attn: Alan D. Smith (adsmith@perkinscoie.com) and Amir Gamliel (agamliel@perkinscoie.com); and (B) Young Conaway Stargatt & Taylor, LLP (Attn: Edmon L. Morton (emorton@ycst.com) and Kenneth J. Enos (kenos@ycst.com).
- 4. IF AN OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED STRICTLY AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE DISCLOSURE STATEMENT OR THE ADEQUACY THEREOF AND MAY NOT BE HEARD AT THE HEARING.
- 5. The Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Bankruptcy Court of such adjournment on the date scheduled for the Hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtors with the Bankruptcy Court. The Debtors may modify the Disclosure Statement, if necessary, prior to, during, or as a result of the Hearing without further notice.

Dated: December 21, 2021 Wilmington, Delaware

/s/ Zachary I. Shapiro

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