

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

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<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS,	:	Case No. 21-10670 (KBO)
INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors. ¹	:	
-----	X	
UTICA EQUIPMENT FINANCE, LLC, AND	:	
UTICA REALTY WELLINGTON, LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Pro. No. 21-51246 (KBO)
	:	
TECT AEROSPACE WELLINGTON,	:	
INC, <i>et al.</i> ,	:	
	:	
Defendants.	:	
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON JANUARY 25, 2022 AT 2:00 P.M. (PREVAILING EASTERN TIME)²**

**THIS HEARING WILL BE HELD BY VIDEO VIA ZOOM. BOTH VIDEO AND
AUDIO WILL BE THROUGH ZOOM. COURTCALL WILL NOT BE USED.
ALL PARTIES MUST REGISTER THEIR ZOOM APPEARANCE
NO LATER THAN 12:00 P.M. (ET) ON JANUARY 25, 2022
USING THE LINK BELOW:**

https://debuscourts.zoomgov.com/meeting/register/vJIsceiuqTsuEwGoetnyypPXI1h6_6z_4xI

YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM.

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.

² All motions and other pleadings referenced herein are available online at the following address: www.kcellc.net/TECTAerospace.



I. WITHDRAWN MATTER:

1. Debtors' Motion for Entry of an Order Authorizing (I) Abandonment of Certain Property and (II) Granting Related Relief [[D.I. 634](#) – filed November 23, 2021]

Objection/Response Deadline: December 7, 2021 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Objection of Utica Realty Park City, LLC to Debtors' Motion for Entry of an Order Authorizing (I) Abandonment of Certain Property and (II) Granting Related Relief [[D.I. 638](#) – filed December 7, 2021]
- B. Response of Equity Bank in Opposition to Debtors' Motion for Entry of an Order Authorizing (I) Abandonment of Certain Property and (II) Granting Related Relief [[D.I. 639](#) – filed December 7, 2021]

Related Documents:

- i. Certification of Counsel [[D.I. 663](#) – filed December 17, 2021]
- ii. 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 [[D.I. 664](#) – entered December 17, 2021]

Status: This matter has been withdrawn. Accordingly, a hearing regarding this matter is not required.

II. RESOLVED MATTERS:

2. Motion of Debtors for an Order (I) Further Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and (II) Granting Related Relief [[D.I. 680](#) – filed December 30, 2021]

Objection/Response Deadline: January 13, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of Debtors for an Order (I) Further Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and (II) Granting Related Relief [[D.I. 713](#) – filed January 14, 2022]

- ii. Order Further Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and Granting Related Relief [[D.I. 717](#) – entered January 18, 2022]

Status: On January 18, 2022, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

3. Motion of Debtors for Entry of an Order Further Extending Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief [[D.I. 681](#) – filed December 30, 2021]

Objection/Response Deadline: January 13, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Motion of Debtors for Entry of an Order Further Extending Period Within Which the Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief [[D.I. 714](#) – filed January 14, 2022]
- ii. Order Further Extending Period Within Which Debtors May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief [[D.I. 718](#) – entered January 18, 2022]

Status: On January 18, 2022, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

III. INTERIM FEE APPLICATIONS:

4. Second Interim Fee Applications (*See Exhibit A*)

Related Documents:

- i. Certification of Counsel Regarding Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [[D.I. 722](#) – filed January 21, 2022]
- ii. Second Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [[D.I. 723](#) – entered January 21, 2022]

Status: On January 21, 2022, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

IV. STATUS CONFERENCE:

5. Plaintiffs' Motion for Temporary Restraining Order, Preliminary Injunction and Possession Pending Final Judgment [Adv. Pro. No. 21-51246 [D.I. 3](#) – filed November 5, 2021]

Responses Received:

- A. The Boeing Company and Central Kansas Aerospace Manufacturing, LLC's Opposition to Plaintiffs' Motion for Temporary Restraining Order, Preliminary Injunction and Possession Pending Final Judgment [Adv. Pro. No. 21-51246 [D.I. 5](#) – filed December 14, 2021]
- B. Joinder of Debtor Defendants to The Boeing Company and Central Kansas Aerospace Manufacturing, LLC's Opposition to Plaintiffs' Motion for Temporary Restraining Order, Preliminary Injunction and Possession Pending Final Judgment [Adv. Pro. No. 21-51246 [D.I. 6](#) – filed December 14, 2021]

Related Documents:

- i. Complaint [Adv. Pro. No. 21-51246 [D.I. 1](#) – filed November 4, 2021]
- ii. Brief in Support of Plaintiffs' Motion for Temporary Restraining Order, Preliminary Injunction and Possession Pending Final Judgment [Adv. Pro. No. 21-51246 [D.I. 4](#) – filed November 5, 2021]
- iii. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Adv. Pro. No. 21-51246 [D.I. 8](#) – filed December 16, 2021]
- iv. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Adv. Pro. No. 21-51246 [D.I. 9](#) – filed December 16, 2021]
- v. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Adv. Pro. No. 21-51246 [D.I. 10](#) – filed December 16, 2021]
- vi. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Adv. Pro. No. 21-51246 [D.I. 11](#) – filed December 16, 2021]
- vii. Plaintiffs' Request for Oral Argument [Adv. Pro. No. 21-51246 [D.I. 12](#) – filed December 22, 2021]
- viii. Notice of Completion of Briefing [Adv. Pro. No. 21-51246 [D.I. 13](#) – filed December 22, 2021]

Status: This status conference is going forward.

V. MATTER GOING FORWARD:

6. Motion of Debtors for Entry of Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation, Voting, and Related Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Plan, and (V) Granting Related Relief [[D.I. 685](#) – filed January 4, 2022]

Objection/Response Deadline: January 18, 2022 at 4:00 p.m. (ET); extended until January 19, 2022 at 4:00 p.m. (ET) for the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”)

Objections/Responses Received:

- A. Objection of Utica Park City, LLC, Utica Realty Wellington, LLC, Utica Realty Holdings V, LLC, SPEF Carriage Assembly, LLC, SPEF Monolithic, LLC, Office Support Services, LLC and Stony Point Group, Inc. to Motion of Debtors for Entry of Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation, Voting, and Related Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Plan, and (V) Granting Related Relief [[D.I. 716](#) – filed January 18, 2022]
- B. Informal comments from the U.S. Trustee

Related Documents:

- i. Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors [[D.I. 666](#) – filed December 21, 2021]
- ii. Disclosure Statement for Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors [[D.I. 667](#) – filed December 21, 2021]
- iii. 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 [[D.I. 669](#) – filed December 21, 2021]
- iv. Notice of Filing Changed Pages for (I) Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors and (II) the Disclosure Statement Therefor [[D.I. 672](#) – filed December 22, 2021]
- v. Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors [[D.I. 725](#) – filed January 21, 2022]

- vi. Disclosure Statement for Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors [[D.I. 726](#) – filed January 21, 2022]
- vii. Notice of Filing Blacklines of (I) Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors and (II) the Disclosure Statement Therefor [[D.I. 727](#) – filed January 21, 2022]
- viii. Notice of Filing of Revised Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation, Voting, and Related Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Plan, and (V) Granting Related Relief [[D.I. 728](#) – filed January 21, 2022]

Status: The informal comments of the U.S. Trustee have been resolved. The hearing will go forward with respect to the sole remaining objection.

Dated: January 21, 2022
Wilmington, Delaware

/s/ J. Zachary Noble
RICHARDS, LAYTON & FINGER, P.A.
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Attorneys for the Debtors and Debtors in Possession

Exhibit A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

<p><i>In re</i></p> <p>TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i>,</p> <p style="text-align: center;">Debtors.¹</p>	<p>X</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>X</p>	<p>Chapter 11</p> <p>Case No. 21-10670 (KBO)</p> <p>Jointly Administered</p>
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**AMENDED² INDEX OF INTERIM FEE APPLICATIONS SCHEDULED
FOR HEARING ON JANUARY 25, 2022 AT 2:00 P.M. (ET)**

I. INTERIM FEE APPLICATIONS:

1. Notice of Second Interim Fee Application Request of Richards, Layton & Finger, P.A. [[D.I. 655](#) – filed December 15, 2021]

Objection/Response Deadline: January 5, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: **Comments from the United States Bankruptcy Court for the District of Delaware**

Related Documents:

- A. Fifth Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from August 1, 2021 through August 31, 2021 [[D.I. 603](#) – filed October 29, 2021]
- B. Certificate of No Objection Regarding the Fifth Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from August 1, 2021 through August 31, 2021 (No Order Required) [[D.I. 627](#) – filed November 22, 2021]

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.

² Amended items appear in bold.

- C. Sixth Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from September 1, 2021 through September 30, 2021 [[D.I. 636](#) – filed December 3, 2021]
 - D. Certificate of No Objection Regarding the Sixth Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from September 1, 2021 through September 30, 2021 (No Order Required) [[D.I. 675](#) – filed December 28, 2021]
 - E. Seventh Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from October 1, 2021 through October 31, 2021 [[D.I. 637](#) – filed December 6, 2021]
 - F. Certificate of No Objection Regarding the Seventh Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Counsel to the Debtors and Debtors in Possession for the Period from October 1, 2021 through October 31, 2021 (No Order Required) [[D.I. 677](#) – filed December 28, 2021]
2. Second Interim Fee 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 August 1, 2021 Through and Including October 31, 2021 [[D.I. 657](#) – filed December 16, 2021]

Objection/Response Deadline: January 6, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: None to date

Related Documents:

- A. Fifth 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 August 1, 2021 Through and Including August 31, 2021 [[D.I. 507](#) – filed September 22, 2021]
- B. Certificate of No Objection Regarding Fifth Monthly Fee 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 August 1, 2021 Through and Including August 31, 2021 [[D.I. 549](#) – filed October 14, 2021]

- C. 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 [[D.I. 572](#) – filed October 20, 2021]
 - D. Certificate of No Objection Regarding Sixth Monthly Fee 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 [[D.I. 619](#) – filed November 15, 2021]
 - E. Seventh 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 October 1, 2021 Through and Including October 31, 2021 [[D.I. 629](#) – filed November 22, 2021]
 - F. Certificate of No Objection Regarding Seventh Monthly Fee 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 October 1, 2021 Through and Including October 31, 2021 [[D.I. 650](#) – filed December 14, 2021]
 - G. Certificate of No Objection Regarding Second Interim Fee 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 August 1, 2021 Through October 31, 2021 [[D.I. 711](#) – filed January 13, 2022]
3. Second Interim Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from August 1, 2021 through October 31, 2021 [[D.I. 658](#) – filed December 16, 2021]

Objection/Response Deadline: January 6, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: None to date

Related Documents:

- A. Fifth Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from August 1, 2021 through August 31, 2021 [[D.I. 508](#) – filed September 22, 2021]
- B. Certificate of No Objection Regarding Fifth Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial

Advisor to the Official Committee of Unsecured Creditors, for the Period from August 1, 2021 through August 31, 2021 [[D.I. 550](#) – filed October 14, 2021]

- C. Sixth Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from September 1, 2021 through September 30, 2021 [[D.I. 573](#) – filed October 20, 2021]
 - D. Certificate of No Objection Regarding Sixth Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from September 1, 2021 through September 30, 2021 [[D.I. 620](#) – filed November 15, 2021]
 - E. Seventh Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from October 1, 2021 through October 31, 2021 [[D.I. 632](#) – filed November 23, 2021]
 - F. Certificate of No Objection Regarding Seventh Monthly Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from October 1, 2021 through October 31, 2021 [[D.I. 653](#) – filed December 15, 2021]
 - G. Certificate of No Objection Regarding Second Interim Fee Application for Compensation and Reimbursement of Expenses of Province, LLC as Financial Advisor to the Official Committee of Unsecured Creditors, for the Period from August 1, 2021 through October 31, 2021 [[D.I. 710](#) – filed January 13, 2022]
4. Second Interim Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period August 1, 2021 through October 31, 2021 [[D.I. 659](#) – filed December 16, 2021]

Objection/Response Deadline: January 6, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: None to date

Related Documents:

- A. Fifth Monthly Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period August 1, 2021 through August 31, 2021 [[D.I. 509](#) – filed September 22, 2021]

- B. Certificate of No Objection Regarding Fifth Monthly Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period August 1, 2021 through August 31, 2021 [[D.I. 551](#) – filed October 14, 2021]
- C. Sixth Monthly Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period September 1, 2021 through September 30, 2021 [[D.I. 584](#) – filed October 25, 2021]
- D. Certificate of No Objection Regarding Sixth Monthly Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period September 1, 2021 through September 30, 2021 [[D.I. 624](#) – filed November 16, 2021]
- E. Seventh Monthly Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period October 1, 2021 through October 31, 2021 [[D.I. 652](#) – filed December 15, 2021]
- F. Certificate of No Objection Regarding Seventh Monthly Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period October 1, 2021 through October 31, 2021 [[D.I. 703](#) – filed January 10, 2022]
- G. Certificate of No Objection Regarding Second Interim Fee Application of Womble Bond Dickinson (US) LLP for Compensation for Services Rendered and Reimbursement of Expenses as Co-Counsel for the Official Committee of Unsecured Creditors for the Period August 1, 2021 through October 31, 2021 [[D.I. 709](#) – filed January 13, 2022]