

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

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

Debtors.

)
) Chapter 11
)
) Case No. 21-10670 (KBO)
)
) (Jointly Administered)
)
) Obj. Deadline: May 16, 2022 at 4:00 p.m. (ET)
)

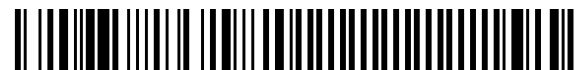
**NOTICE OF TWELFTH MONTHLY APPLICATION OF KILPATRICK
TOWNSEND & STOCKTON LLP FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES AS COUNSEL FOR THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD
FROM MARCH 1, 2022 THROUGH AND INCLUDING MARCH 11, 2022**

PLEASE TAKE NOTICE that, on April 22, 2022, Kilpatrick Townsend & Stockton LLP, lead counsel for the Official Committee of Unsecured Creditors (the “Committee”), filed the *Twelfth 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 of March 1, 2022 through March 11, 2022* (the “Application”).

If you object to the relief sought by the Application, you are required to file a response to the Application, on or before **May 16, 2022 at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the response upon Committee’s counsel:

Matthew P. Ward, Esq. (DE Bar No. 4471) Morgan L. Patterson, Esq. (DE Bar No. 5388) Lisa Bittle Tancredi, Esq. (DE Bar No. 4657) WOMBLE BOND DICKINSON (US) LLP 1313 North Market Street, Suite 1200 Wilmington, DE 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330	David M. Posner, Esq. Gianfranco Finizio, Esq. Kelly E. Moynihan, Esq. KILPATRICK TOWNSEND & STOCKTON LLP 1114 Avenue of the Americas New York, NY 10036 Telephone: (212) 775-8700 Facsimile: (212) 775-8800
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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.



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PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THEN 80% OF FEES AND 100% OF THE EXPENSES REQUESTED IN THE APPLICATION MAY BE PAID PURSUANT TO THE INTERIM COMPENSATION ORDER WITHOUT FURTHER HEARING OR ORDER OF THE COURT.

A HEARING ON THE APPLICATION WILL BE HELD ONLY IF OBJECTIONS ARE FILED, OR IF THE COURT DIRECTS OTHERWISE AT A DATE AND TIME TO BE SCHEDULED BY THE COURT.

Dated: April 25, 2022
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Morgan L. Patterson
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-and-

KILPATRICK TOWNSEND & STOCKTON LLP

David M. Posner (admitted *pro hac vice*)
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*Counsel to the Official Committee of
Unsecured Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT
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**SUMMARY OF TWELFTH 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
MARCH 1, 2022 THROUGH AND INCLUDING MARCH 11, 2022**

Name of Applicant:	Kilpatrick Townsend & Stockton LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Effective Date of Retention:	April 21, 2021 (Order entered May 20, 2021)
Period for which Compensation and Reimbursement is Sought:	March 1, 2022 – March 11, 2022
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$16,843.60 (80% of \$21,054.50)
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$0.00
This is an/a <u> X </u> monthly <u> </u> interim <u> </u> final application	

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Prior Monthly Fee Applications

Application	Date Filed	Period Covered	Requested Fees/Expenses	Approved Fees/ Expenses
1 st Application	05/27/2021	4/21/2021 – 4/30/2021	\$174,631.00/\$0.00	\$174,631.00/\$0.00
2 nd Application	06/28/2021	5/1/2021 – 5/31/2021	\$289,367.50/\$734.02	\$289,367.50/\$734.02
3 rd Application	7/19/2021	6/1/2021 – 6/30/2021	\$238,776.50/\$3,543.86	\$186,803.17/\$3,197.18
4 th Application	8/24/2021	7/1/2021 – 7/31/2021	\$114,668.50/\$153.63	\$114,668.50/\$153.63
5 th Application	9/22/2021	8/1/2021 – 8/31/2021	\$77,719.50/\$41.28	\$77,719.50/\$41.28
6 th Application	10/20/2021	9/1/2021 – 9/30/2021	\$136,700.00/\$773.52	\$136,700.00/\$773.52
7 th Application	11/22/2021	10/1/2021 – 10/31/2021	\$58,495.00/\$0.00	\$58,495.00/\$0.00
8 th Application	12/21/2021	11/1/2021 – 11/30/2021	\$36,665.00/\$35.53	\$29,332.00/\$35.53
9 th Application	1/20/2022	12/1/2021 – 12/31/2021	\$36,632.50/\$17.37	\$29,306.00/\$17.37
10 th Application	2/22/2022	1/1/2022 – 1/31/2022	\$80,933.50/\$21.50	\$64,746.80/\$21.50
11 th Application	3/21/2022	2/1/2022 – 2/28/2022	\$72,873.50/\$31.60	\$58,298.80/\$31.60

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COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM
MARCH 1, 2022 THROUGH AND INCLUDING MARCH 11, 2022**

Pursuant to sections 330 and 331 of title 11 of the United States Code §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), Kilpatrick Townsend & Stockton LLP (“Kilpatrick Townsend” or “Applicant”), lead counsel to the Official Committee of Unsecured Creditors (the “Committee”), hereby submits its twelfth monthly application (the “Application”) for compensation and reimbursement of expenses for the period from March 1, 2022 through and including March 11, 2022 (the “Application Period”). By this Application, Kilpatrick Townsend seeks a monthly interim allowance of compensation in the amount of \$21,054.50 and reimbursement of actual expenses necessarily incurred in the amount

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of \$0.00 for an aggregate total of \$21,054.50 in accordance with that certain *Order Authorizing the Employment and Retention of Kilpatrick Townsend & Stockton LLP as Attorneys for the Official Committee of Unsecured Creditors of TECT Aerospace Group Holdings, Inc., et al., Effective As of April 21, 2021* [D.I. 184] (the “Kilpatrick Townsend Retention Order”) and that certain *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* [D.I. 135] (the “Interim Compensation Order”). Kilpatrick Townsend seeks payment of \$16,843.60 (80% of the allowed fees) and reimbursement of \$0.00 (100% of the allowed expenses), for an aggregate total payment of \$16,843.60 for the Application Period. In support of the Application, Kilpatrick Townsend respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the above-captioned cases (the “Chapter 11 Cases”) and this Application in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Rule 2016 of the Bankruptcy Rules and Rule 2016-2 of the Local Rules.

BACKGROUND

3. On April 5, 2021 (the “Petition Date”), the Debtors filed voluntary petitions for relief with the Court under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). No request for the appointment of a trustee or examiner has been made in these Chapter 11 Cases.

4. On April 20, 2021, the Office of the United States Trustee for the District of Delaware formed the Committee. *See* D.I. 76.

5. On April 21, 2021, the Committee selected the undersigned counsel to serve as its lead counsel in these Chapter 11 Cases.

6. On May 20, 2021, the Court entered the Kilpatrick Townsend Retention Order.

7. The effective date of the *Joint Chapter 11 Plan of Liquidation for TECT Aerospace Group Holdings, Inc. and Its Affiliated Debtors* occurred on March 11, 2022. *See* Dkt. No 822.

PROFESSIONAL SERVICES RENDERED

8. Subject to Court approval, Kilpatrick Townsend seeks payment for compensation on an hourly basis, plus reimbursement of actual, necessary expenses incurred by Kilpatrick Townsend during the Application Period. The rates charged by Kilpatrick Townsend in these Chapter 11 Cases do not differ from the rates charged to Kilpatrick Townsend's non-bankruptcy clients.

9. A summary of the hours spent, the names of each professional and paraprofessional rendering services to the Committee during the Application Period, the regular customary billing rates and the total value of time incurred by each of the Kilpatrick Townsend attorneys rendering services to the Committee is attached hereto as **Exhibit A**.

10. During the Application Period, Kilpatrick Townsend rendered services related to, among other matters: (a) reviewing and providing comments on draft omnibus claims objections; (b) reviewing and providing comments to revised drafts of the chapter 11 plan and confirmation order; (c) reviewing the declaration of Shaun Martin in support of confirmation; (d) preparing for

and attending the confirmation hearing; and (e) regularly communicating with counsel to the Debtors and Boeing regarding the plan and confirmation.

11. A copy of the computer generated time entries reflecting the time recorded for these services, organized in project billing categories in accordance with the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 USC § 330 by Attorneys in Larger Chapter 11 Cases*, as well as a summary of time recorded by project billing category, is attached hereto as **Exhibit B**. All time entries and requested expenses are in compliance with Rule 2016-2 of the Local Rules.

12. On May 5, 2021, the Court entered the Interim Compensation Order. Pursuant to the Interim Compensation Order, Kilpatrick Townsend and other estate professionals retained in the Chapter 11 Cases are authorized to file and serve upon the Debtors and the parties identified in the Interim Compensation Order monthly fee applications (each, a “Monthly Fee Application”) for their fees and expenses. After the expiration of a twenty-one (21) day objection period, the Debtors are authorized to promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the relevant Monthly Fee Application, unless an objection has been filed to the requested fees and/or expenses or the Court orders otherwise.

13. In accordance with the Interim Compensation Order, Kilpatrick Townsend has filed and served upon the Debtors and the other notice parties identified in the Interim Compensation Order this Application regarding its fees and expenses incurred during the Application Period.

14. All services rendered for which compensation is requested and all costs incurred for which reimbursement is requested by Kilpatrick Townsend in this Application were

reasonable, necessary and appropriate and were performed for or incurred on behalf of the Committee during the Application Period. In addition, Kilpatrick Townsend worked closely with the Committee's Delaware counsel, Womble Bond Dickinson (US) LLP, and the Committee's financial advisor, Province, Inc., to ensure that there was no duplication of services and that all matters were appropriately and diligently handled for the Committee in a timely and efficient manner.

CONCLUSION

15. Applicant has necessarily and properly expended 88.2 hours of services in the performance of its duties as lead counsel to the Committee during the Application Period. Applicant respectfully requests an interim fee allowance for professional services rendered in the amount of \$16,843.60 (comprising 80% of \$21,054.50). Applicant has also necessarily incurred reasonable and necessary disbursements in the amount of \$0.00 in the performance of Applicant's duties to the Committee during the Application Period and respectfully requests reimbursement of such amount.

16. As stated in the Declaration of David M. Posner, annexed hereto as **Exhibit C**, Applicant has not agreed to share any compensation to be received herein with any other person.

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WHEREFORE, Applicant respectfully requests an interim award of compensation for professional services rendered as lead counsel to the Committee during the Application Period in the sum of \$16,843.60 (80% of \$21,054.50) together with reimbursement of disbursements in the amount of \$0.00 and for such other and further relief as the Court deems just and proper.

Dated: April 25, 2022

KILPATRICK TOWNSEND & STOCKTON LLP

/s/ David M. Posner

David M. Posner, Esq. (admitted *pro hac vice*)

Gianfranco Finizio, Esq. (admitted *pro hac vice*)

Kelly E. Moynihan, Esq. (admitted *pro hac vice*)

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*Counsel to the Official Committee of Unsecured
Creditors of TECT Aerospace Group Holdings, Inc.,
et al.*

EXHIBIT A**Summary of Billing by Professional**

Name of Attorney of Other Professional	Year Admitted to Practice	Hourly Rate	Hours Billed	Total Fees
Gianfranco Finizio	2009	\$895.00	13.8	\$12,351.00
David M. Posner	1989	\$1,295.00	3.4	\$4,403.00
Kelly Moynihan	2016	\$750.00	4.8	\$3,600.00
James R. Risener	2020	\$545.00	0.9	\$490.50
Jennipher Borey	Paralegal	\$300.00	0.7	\$210.00
TOTALS			23.6	\$21,054.50

Blended Hourly Rate: \$892.14

EXHIBIT B**Compensation by Project Category**

Project Category	Total Hours	Total Fees
Case Administration and Analysis	0.2	\$164.50
Claims Adm. and Objections	7.0	\$6,149.00
Fee/Employment Applications	0.9	\$642.50
Fee/Employment Objections	0.7	\$416.50
Financing	0.1	\$89.50
Meetings of Creditors	0.7	\$579.50
Plan and Disclosure Statement	14.0	\$13,013.00
TOTALS	23.6	\$21,054.50



ATTORNEYS AT LAW

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Fed I.D. 58-0511774

March 21, 2022

TECT OFFICIAL CREDITORS' COMMITTEE
1738 GENERAL GEORGE PATTON DRIVE
BRENTWOOD, TN 37027

Client: 107959
Matter: 1248726
Invoice #: 12613237

RE: TECT AEROSPACE BANKRUPTCY

For Professional Services Through March 11, 2022:

B130 - Case Administration and Analysis

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/07/2022	GF	Review MOR filings.	0.10	89.50
03/07/2022	KM	Email to J. Borey regarding hearing.	0.10	75.00
		Task Subtotal	0.20	164.50

B140 - Claims Adm. and Objections

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/01/2022	GF	Review drafts of first (.2) and second (.3) omnibus claim objections; and email to M. Patterson on same (.1); review summary of Mecadaq litigation claims (.3); review Mecadaq proof of claim (.2); review GUC summary after accounting for claim objections (.2).	1.30	1,163.50
03/02/2022	GF	Email to M. Patterson regarding claims reconciliation matters.	0.10	89.50
03/03/2022	GF	Review calculation of Boeing class 4 claim.	0.50	447.50
03/03/2022	KM	Review notices of satisfaction (.2); correspondence with G. Finizio regarding same (.1); correspondence with Z. Shapiro regarding same (.1).	0.40	300.00

Amounts are calculated per entry, rounding discrepancies may occur in summaries or totals as a result of prearranged discounts.

Due and Payable upon receipt. 1% interest per month charged on balances after 30 days.

When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

B140 - Claims Adm. and Objections

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/04/2022	GF	Emails with J. Risener on omnibus claim objections (.2); review L. Tancredi comments to omnibus claim objections (.3); email to Z. Shapiro on same (.1); review emails regarding status of Spirit claim stipulation (.2).	0.80	716.00
03/04/2022	KM	Review L. Tancredi comments to claims objections.	0.10	75.00
03/07/2022	GF	Review draft of claim stipulation with Spirit (.3); compare same with Spirit proof of claim (.8) and GUC pool claim summary (.2); email to Z. Shapiro regarding Spirit claim stipulation (.1); review emails from A. Gamliel and Z. Shapiro regarding Spirit matters (.2); call with Z. Shapiro on Spirit claim (.1); report to D. Posner on same (.1); review revised Spirit claim stipulation (.1).	1.90	1,700.50
03/08/2022	GF	Email to Womble team regarding class 4 claims reconciliation.	0.10	89.50
03/08/2022	KM	Correspondence from G. Finizio regarding claims objections.	0.10	75.00
03/09/2022	GF	Review proposed order approving Spirit claim stipulation.	0.10	89.50
03/11/2022	GF	Review Riveron analysis of Boeing class 4 claim (.2); compare analysis with proof of claim filings and prior GUC pool summary (1.1) email to Riveron regarding (.1).	1.40	1,253.00
03/11/2022	KM	Correspondence from G. Finizio and Z. Shapiro regarding Boeing GUC claim.	0.20	150.00
Task Subtotal			7.00	6,149.00

B160 - Fee/Employment Applications

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/04/2022	GF	Emails with K. Moynihan regarding necessity of third interim fee application.	0.10	89.50
03/04/2022	KM	Correspondence with G. Finizio regarding fee applications.	0.20	150.00
03/08/2022	JRR	Prepare draft of eleventh monthly fee application.	0.30	163.50
03/10/2022	KM	Correspondence from G. Finizio regarding fee applications.	0.10	75.00

B160 - Fee/Employment Applications

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/11/2022	GF	Review draft February monthly fee statement.	0.10	89.50
03/11/2022	KM	Correspondence with G. Finizio regarding fee estimates.	0.10	75.00
		<i>Task Subtotal</i>	0.90	642.50

B170 - Fee/Employment Objections

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/11/2022	GF	Emails with J. Risener on OCP quarterly statement filings.	0.10	89.50
03/11/2022	JRR	Review TECT Ordinary Course Professionals Reports (.5); correspondence with G. Finizio regarding same (.1).	0.60	327.00
		<i>Task Subtotal</i>	0.70	416.50

B180 - Financing

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/04/2022	GF	Review budget for final budgeted week per call with Z. Shapiro on same.	0.10	89.50
		<i>Task Subtotal</i>	0.10	89.50

B200 - Meetings of Creditors

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/02/2022	KM	Email to Committee regarding plan status.	0.30	225.00
03/02/2022	DMP	Review draft of email to Committee regarding confirmation.	0.10	129.50
03/08/2022	KM	Review email to committee regarding confirmation.	0.10	75.00
03/11/2022	KM	Email to Committee regarding effective date.	0.20	150.00
		<i>Task Subtotal</i>	0.70	579.50

B210 - Plan and Disclosure Statement

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/01/2022	GF	Review drafts of further revised plan (.4); emails with S. Kietlinski on same (.2); review draft confirmation order (.7); call with Z. Shapiro on plan status (.1); email to D. Posner and K. Moynihan regarding call with Z. Shapiro on plan updates (.2); emails with M. Patterson on draft confirmation order (.1); review emails from A. Smith on flow of funds (.1); review checklist of plan documents to be filed (.1).	1.90	1,700.50
03/01/2022	KM	Review confirmation order (.5); correspondence with G. Finizio regarding same (.2).	0.70	525.00
03/01/2022	DMP	Review revised plan to accommodate UST resolution (.1); correspondence with RLF, KTS and Perkins regarding same (.2); correspondence with Boeing counsel, Debtors and Committee counsel regarding confirmation order (.2); telephone call with A. Smith regarding Trust Agreements (.2).	0.70	906.50
03/02/2022	GF	Review draft email to committee regarding confirmation (.1) and prepare edits to same (.1).	0.20	179.00
03/02/2022	KM	Review updated trust agreements (.2); correspondence with D. Posner, RLF, A. Smith regarding same (.1); review Delaware trustee information (.1).	0.40	300.00
03/02/2022	DMP	Correspondence with G. Finizio, K. Moynihan and RLF regarding trust agreement modifications (.2) and confirmation order (.2).	0.40	518.00
03/03/2022	GF	Review draft Martin declaration (.5) and prepare redline with comments (.4); review further revised Martin declaration circulated by S. Martin (.2); review voting declaration (.2); review revised GUC Trust Agreement (.3); review revised Liquidation Trust Agreement (.3).	1.90	1,700.50
03/03/2022	KM	Review S. Martin declaration in support of confirmation (.5); correspondence with D. Posner and G. Finizio regarding same (.2); review revised S. Martin declaration (.1); email to D. Posner and G. Finizio regarding same (.1); review voting declaration (.2).	1.10	825.00
03/03/2022	DMP	Review draft of S. Martin declaration in support of confirmation (.4); review proposed comments to declaration (.1); review final version of S. Martin dec (.1); correspondence with KTS, RLF and Perkins Coie regarding same (.1).	0.80	1,036.00

B210 - Plan and Disclosure Statement

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/04/2022	GF	Emails with J. Risener on voting results (.1); call with Z. Shapiro on confirmation hearing (.2); email report to D. Posner and K. Moynihan on same (.1); review agenda for confirmation hearing (.1); emails with D. Posner regarding revised trust agreements (.1); review trust agreements regarding indemnity provisions (.5).	1.10	984.50
03/04/2022	KM	Correspondence from G. Finizio regarding effective date.	0.10	75.00
03/06/2022	KM	Email from Z. Shapiro regarding spirit confirmation order language.	0.10	75.00
03/07/2022	JB	Review bankruptcy pleadings regarding Chapter 11 Plan for calendar updates on critical dates (.4); calendar omnibus hearing date (.1); emails to and from K. Moynihan regarding same (.2).	0.70	210.00
03/07/2022	GF	Review confirmation order language from Spirit (.1); emails with D. Posner and M. Ward on same (.1); review latest draft of confirmation order (.3); review emails from A. Smith regarding Spirit matters (.1); email to D. Posner and Womble team regarding responses to A. Smith email on plan/Spirit matters (.2); email to Womble and Province teams regarding projected effective date (.1); review agenda for confirmation hearing (.1).	1.00	895.00
03/07/2022	KM	Correspondence regarding Spirit stipulation and confirmation order language.	0.20	150.00
03/07/2022	DMP	Review Spirit language for confirmation order (.1); correspondence with G. Finizio and K. Moynihan regarding same (.1); review email from A. Smith regarding Spirit stipulation and issues (.1); review correspondence between A. Smith and Z. Shapiro regarding Spirit issues and language (.2).	0.50	647.50
03/08/2022	GF	Participate in confirmation hearing (.4); prepare email report to committee on same (.2); emails with S. Kietlinski on trust professionals and effective date (.1).	0.70	626.50
03/08/2022	DMP	Prepare for confirmation hearing (.5); attend confirmation hearing (.4).	0.90	1,165.50
03/10/2022	GF	Emails with Z. Shapiro on status of effective date and report back to team on same.	0.10	89.50
03/10/2022	KM	Correspondence from G. Finizio regarding effective date.	0.10	75.00

B210 - Plan and Disclosure Statement

<i>Date</i>	<i>Initials</i>	<i>Description</i>	<i>Hours</i>	<i>Amount</i>
03/11/2022	GF	Review flow of funds from Z. Shapiro (.1); review and revise draft email to Committee regarding effective date (.1).	0.20	179.00
03/11/2022	KM	Correspondence from Z. Shapiro regarding effective date and funds flow (.1); correspondence from G. Finizio regarding same (.1).	0.20	150.00
Task Subtotal			14.00	13,013.00

Total Fees

\$21,054.50

Task Code Summary

<i>Task Code</i>	<i>Task Description</i>	<i>Amount</i>
B130	Case Administration and Analysis	164.50
B140	Claims Adm. and Objections	6,149.00
B160	Fee/Employment Applications	642.50
B170	Fee/Employment Objections	416.50
B180	Financing	89.50
B200	Meetings of Creditors	579.50
B210	Plan and Disclosure Statement	13,013.00
Total		\$21,054.50

<i>Summary</i>	<i>Timekeeper Name</i>	<i>Hours</i>	<i>Rate/Hour</i>	<i>Amount</i>
GF	Gianfranco Finizio	13.80	895.00	12,351.00
DMP	David Posner	3.40	1,295.00	4,403.00
KM	Kelly Moynihan	4.80	750.00	3,600.00
JRR	James Risener	0.90	545.00	490.50
JB	Jennipher Borey	0.70	300.00	210.00
Totals		23.60		\$21,054.50

TOTAL AMOUNT DUE THIS INVOICE

\$21,054.50

EXHIBIT C

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

In re:)	
)	Chapter 11
)	
TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 21-10670 (KBO)
)	
Debtors.)	(Jointly Administered)
)	

**DECLARATION OF DAVID M. POSNER IN SUPPORT OF
TWELFTH 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
MARCH 1, 2022 THROUGH AND INCLUDING MARCH 11, 2022**

I, David M. Posner, under penalty of perjury, declare as follows:

1. I am a partner in the firm of Kilpatrick Townsend & Stockton LLP (“Kilpatrick Townsend”), counsel to the Official Committee of Unsecured Creditors (the “Committee”).

2. I have read the foregoing *Twelfth 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 March 1, 2022 through and including March 11, 2022* and know the contents thereof. The same contents are true to the best of my knowledge, except as to matters therein alleged to be upon information and belief, and as to those matters, I believe them to be true. I have personally performed many of the legal

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.

services rendered by Kilpatrick Townsend and am thoroughly familiar with all other work performed on behalf of the Committee by the attorneys and paraprofessionals in Kilpatrick Townsend.

3. In accordance with Rule 2016(a) of the Federal Rules of Bankruptcy Procedure and Section 504 of the Title 11, United States Code, no agreement or understanding exists between Kilpatrick Townsend and any other person for the sharing of compensation to be received in connection with the above-captioned cases.

4. I have reviewed the requirements of Local Rule 2016-2 of the United States Bankruptcy Court for the District of Delaware, and to the best of my knowledge, information and belief, this Application complies with Local Rule 2016-2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 25, 2022

/s/ David M. Posner
David M. Posner