

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

<p><i>In re</i></p> <p><b>TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i>,</b></p> <p style="text-align: center;"><b>Debtors.<sup>1</sup></b></p>	X : : : : : : : : X	<p><b>Chapter 11</b></p> <p><b>Case No. 21-10670 (KBO)</b></p> <p><b>Jointly Administered</b></p> <p><b>Re: D.I. 993</b></p>
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**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF LIQUIDATION  
TRUST FOR ENTRY OF AN ORDER FURTHER EXTENDING PERIOD WITHIN  
WHICH THE TRUSTS MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452  
AND FED. R. BANKR. P. 9027 AND GRANTING RELATED RELIEF**

The undersigned hereby certifies that she has received no answer, objection or any other responsive pleading with respect to the *Motion of Liquidation Trust for Entry of an Order Further Extending Period Within Which the Trusts May Remove Actions Pursuant to 28 U.S.C. § 1452 and Fed. R. Bankr. P. 9027 and Granting Related Relief* [D.I. 993] (the “**Motion**”) filed by the Liquidation Trust,<sup>2</sup> as the representative of the Debtors’ estates pursuant to the Plan, with the United States Bankruptcy Court for the District of Delaware (the “**Court**”) on November 2, 2022.

The undersigned further certifies that she has reviewed the Court’s docket in the above-referenced chapter 11 cases and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Motion and Hearing* filed contemporaneously

<sup>1</sup> 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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Plan (as defined in the Motion).



with the Motion, objections or responses to the Motion were to be filed no later than November 16, 2022 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”).

WHEREFORE, the Liquidation Trust respectfully requests that the proposed form of order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: November 17, 2022

/s/ Huiqi Liu  
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**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

<b><i>In re</i></b>  <b>TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i>,</b>  <p style="text-align: center;"><b>Debtors.<sup>1</sup></b> </p>	X : : : : : : X	<b>Chapter 11</b>  <b>Case No. 21–10670 (KBO)</b>  <b>Jointly Administered</b>  <b>D.I. 993</b>
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**ORDER FURTHER EXTENDING PERIOD WITHIN WHICH THE TRUSTS  
MAY REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND  
FED. R. BANKR. P. 9027 AND GRANTING RELATED RELIEF**

Upon the motion (the “**Motion**”)<sup>2</sup> of the Liquidation Trust for entry of an order extending the time by which the Trusts may file notices of removal under Bankruptcy Rule 9027 and granting related relief, all as more fully described in the Motion; and the Court having reviewed the Motion and having considered the statements of counsel with respect to the Motion at a hearing (if any) before the Court; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

necessary; and upon the record of all proceedings before the Court; and after due deliberation thereon; and the Court having determined that there is good and sufficient cause for the relief granted in this Order,

**IT IS HEREBY ORDERED THAT**

1. The Motion is granted to the extent set forth herein.
2. The time period provided under Bankruptcy Rule 9027(a)(2) and 9027(a)(3) within which the Trusts may file notices of removal of any and all civil actions is extended through and including March 2, 2023, to the extent that the time period for filing any such notices of removal expires on or before that date.
3. This Order shall be without prejudice to (a) any position the Trusts or their successors in interest may take regarding whether section 362 of the Bankruptcy Code applies to stay any pending civil action in which any Debtor is a party and (b) the rights of the Trusts or their successors in interest to seek from this Court further extensions of the period within which the Trusts may file notices of removal under Bankruptcy Rule 9027(a).
4. The Trusts are authorized to take all reasonable actions necessary or appropriate to implement the relief granted in this Order.
5. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.