

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

-----	X	
<i>In re</i>	:	Chapter 11
	:	
TECT AEROSPACE GROUP HOLDINGS,	:	Case No. 21-10670 (KBO)
INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors. ¹	:	
	:	Re: D.I. 1103
-----	X	

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF LIQUIDATION
TRUST FOR ENTRY OF AN ORDER FURTHER EXTENDING THE
DEADLINE TO OBJECT TO CLAIMS UNDER THE PLAN**

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 the Deadline to Object to Claims Under the Plan* [D.I. 1103] (the “**Motion**”) filed by the Liquidation Trust,² 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 March 4, 2024.

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

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 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 March 18, 2024 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: March 19, 2024

/s/ Huiqi Liu
RICHARDS, LAYTON & FINGER, P.A.
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Zachary I. Shapiro (No. 5103)
Huiqi Liu (No. 6850)
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
shapiro@rlf.com
liu@rlf.com

Attorneys for the Liquidation Trust

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

<i>In re</i> TECT AEROSPACE GROUP HOLDINGS, INC., <i>et al.</i>, <p style="text-align: center;">Debtors.¹ </p>	X : : : : : : : : X	Chapter 11 Case No. 21–10670 (KBO) Jointly Administered Re: D.I. 1103
--	--	--

**ORDER FURTHER EXTENDING THE DEADLINE
TO OBJECT TO CLAIMS UNDER THE PLAN**

Upon the motion (the “**Motion**”)² of the Liquidation Trust for entry of an order extending the Claims Objection Bar Date, 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

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 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 Claims Objection Bar Date is extended by approximately 180 days, through and including September 3, 2024, without prejudice to the right of the Trusts to request further extensions of the Claims Objection Bar Date.
3. The Trusts are authorized to take all reasonable actions necessary or appropriate to implement the relief granted in this Order.
4. Notwithstanding anything to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon entry.
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.