UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

Chapter 11 In re

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

INC., et al.,

Jointly Administered

Debtors.1

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON AUGUST 25, 2021 AT 2:00 P.M. (PREVAILING EASTERN TIME)²

AS NO MATTERS ARE GOING FORWARD, THE HEARING HAS BEEN CANCELLED WITH THE PERMISSION OF THE COURT.

I. **CONTINUED MATTER:**

1. Debtors' Motion for Entry of Orders (I) (A) Establishing Bidding Procedures for the Sale of the Debtors' Everett, WA Assets, (B) Authorizing Entry into the Stalking Horse Agreement and Granting Bid Protections, (C) Scheduling an Auction and Sale Hearing, (D) Approving the Form and Manner of Notice Thereof, (E) Approving Assumption and Assignment Procedures, and (F) Granting Related Relief, and (II) (A) Approving Sale of the Debtors' Everett, WA Assets Free and Clear of all Liens, Claims, Interests, and Encumbrances, (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases and (C) Granting Related Relief (REDACTED) [D.I. 152 – filed May 7, 2021]

Cure Objection/Response Deadline: June 10, 2021 at 4:00 p.m. (ET)

Supplemental Cure Objection/Response Deadline: June 21, 2021 at 4:00 p.m. (ET)

Remaining Cure Objections/Responses Received:

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



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 300 W. Douglas, Suite 100, Wichita, KS 67202.

A. Limited Objection of Magparts, Consolidated Foundries, Inc., Onamac Industries, Inc., Cast Parts, Inc., PAC Foundries, Inc. and PAC-Rancho, Inc. to the Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale of Debtors' Everett, WA Assets [D.I. 271 – filed June 10, 2021]

Related Documents:

- i. Debtors' Motion for Entry of Orders (I) (A) Establishing Bidding Procedures for the Sale of the Debtors' Everett, WA Assets, (B) Authorizing Entry into the Stalking Horse Agreement and Granting Bid Protections, (C) Scheduling an Auction and Sale Hearing, (D) Approving the Form and Manner of Notice Thereof, (E) Approving Assumption and Assignment Procedures, and (F) Granting Related Relief, and (II) (A) Approving Sale of the Debtors' Everett, WA Assets Free and Clear of all Liens, Claims, Interests, and Encumbrances, (B) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases, and (C) Granting Related Relief (SEALED) [D.I. 151– filed May 7, 2021]
- ii. Order (I) Establishing Bidding Procedures for the Sale of the Debtors' Everett, WA Assets, (II) Authorizing Entry into the Stalking Horse Agreement and Granting Bid Protections, (III) Scheduling an Auction and Sale Hearing, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Assumption and Assignment Procedures, and (VI) Granting Related Relief [D.I. 206 entered May 25, 2021]
- iii. Notice of Proposed Sale, Bidding Procedures, Auction and Sale Hearing [D.I. 214 filed May 27, 2021]
- iv. Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale of Debtors' Everett, WA Assets [D.I. 215 filed May 27, 2021]
- v. Affidavit of Publication of the Notice of Proposed Sale, Bidding Procedures, Auction and Sale Hearing in The Wall Street Journal [D.I. 222 filed June 1, 2021]
- vi. Affidavit of Publication of the Notice of Proposed Sale, Bidding Procedures, Auction and Sale Hearing in The Seattle Times [D.I. 223 filed June 1, 2021]
- vii. Notice of (I) Cancellation of Auction and (II) Designation of the Stalking Horse Bidder as the Successful Bidder [D.I. 275 filed June 11, 2021]
- viii. Supplemental Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale of Debtors' Everett, WA Assets [D.I. 276 filed June 11, 2021]
- ix. Order (I) Approving the Sale of the Debtors' Everett, WA Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (II) Approving the Assumption

and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [D.I. 313 – entered June 24, 2021]

<u>Status</u>: The Debtors are working to resolve the remaining cure objection. The unresolved cure objection will be continued by agreement to the next omnibus hearing.

II. RESOLVED MATTERS:

2. Debtors' First Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Unexpired Equipment Leases Effective as of the Rejection Date [D.I. 406 – filed July 31, 2021]

Objection/Response Deadline: August 16, 2021 at 4:00 p.m. (ET)

Objections/Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Debtors' First Omnibus Motion for Entry of an Order Authorizing the Debtors' to Reject Certain Unexpired Equipment Leases Effective as of the Rejection Date [D.I. 423 filed August 17, 2021]
- ii. Order Authorizing the Debtors to Reject Certain Unexpired Equipment Leases Effective as of the Rejection Date [D.I. 424 entered August 18, 2021]

Status: On August 18, 2021, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

3. Motion of Debtors for an Order (I) Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and (II) Granting Related Relief [D.I. 408 – filed August 3, 2021]

Objection/Response Deadline: August 17, 2021 at 4:00 p.m. (ET)

Objections/Responses Received:

A. Limited Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for an Order (I) Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and (II) Granting Related Relief [D.I. 422 – filed August 17, 2021]

Related Documents:

i. Certification of Counsel Regarding Order Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and Granting Related Relief [D.I. 440 – filed August 23, 2021]

ii. Order Extending the Exclusivity Periods to File and Solicit Acceptances of a Chapter 11 Plan and Granting Related Relief [D.I. 442 – entered August 23, 2021]

Status: On August 23, 2021, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

Dated: August 23, 2021 Wilmington, Delaware

/s/ Christopher M. De Lillo

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