

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

**WESCO AIRCRAFT HOLDINGS, INC.,
et al.,¹**

Debtors.

Case No. 23-90611 (DRJ)

Chapter 11

(Jointly Administered)

**NOTICE OF DEADLINES
FOR THE FILING OF PROOFS OF CLAIM,
INCLUDING REQUESTS FOR PAYMENT PURSUANT
TO SECTION 503(B)(9) OF THE BANKRUPTCY CODE**

To all persons and entities who may have claims against any of the following Debtor entities:

DEBTOR	CASE NO.
Wesco Aircraft Holdings, Inc.	23-90611
Adams Aviation Supply Co. Ltd.	23-90666
Flintbrook Ltd.	23-90695
Haas Chemical Management of Mexico, Inc.	23-90696
Haas Corp. of Canada	23-90693
Haas Corp. of China	23-90697
Haas Group Canada Inc.	23-90698
Haas Group International SCM Ltd.	23-90699
Haas Group International, LLC	23-90691
Haas Group, LLC	23-90667

¹ The Debtors operate under the trade name Incora and have previously used the trade names Wesco, Pattonair, Haas, and Adams Aviation. A complete list of the Debtors in these chapter 11 cases, with each one's federal tax identification number and the address of its principal office, is available on the website of the Debtors' noticing agent at <https://www.kccllc.net/Incora>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.



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DEBTOR	CASE NO.
Haas Holdings, LLC	23-90690
Haas International Corp.	23-90700
Haas of Delaware LLC	23-90692
Haas TCM de Mexico, S. de R.L. de C.V.	23-90701
Haas TCM Group of the UK Ltd.	23-90702
Haas TCM Industries LLC	23-90689
Haas TCM of Israel Inc.	23-90703
Interfast USA Holdings Inc.	23-90684
NetMRO, LLC	23-90685
Pattonair (Derby) Ltd.	23-90668
Pattonair Europe Ltd.	23-90669
Pattonair Group Ltd.	23-90670
Pattonair Holding, Inc.	23-90686
Pattonair Holdings Ltd.	23-90671
Pattonair Ltd.	23-90672
Pattonair USA, Inc.	23-90604
Pioneer Finance Corp.	23-90682
Pioneer Holding Corp.	23-90704
Quicksilver Midco Ltd.	23-90673
UNISEAL, Inc.	23-90674
Wesco 1 LLP	23-90675
Wesco 2 LLP	23-90676
Wesco Aircraft Canada Inc.	23-90694
Wesco Aircraft Canada, LLC	23-90688
Wesco Aircraft EMEA, Ltd.	23-90705
Wesco Aircraft Europe Ltd.	23-90706
Wesco Aircraft Hardware Corp.	23-90677
Wesco Aircraft International Holdings Ltd.	23-90707
Wesco Aircraft SF, LLC	23-90687
Wesco LLC 1	23-90678
Wesco LLC 2	23-90679
Wolverine Intermediate Holding Corp.	23-90680
Wolverine Intermediate Holding II Corp.	23-90681
Wolverine UK Holdco Ltd.	23-90683

PLEASE TAKE NOTICE THAT:

On June 1, 2023 (the “*Petition Date*”), Wesco Aircraft Holdings, Inc. and certain of its affiliates, as debtors and debtors in possession (collectively, the “*Debtors*”), each filed a voluntary petition for relief under title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the Southern District of Texas (the “*Court*”).

On September 11, 2023 the Court entered an order [Docket No. 750] (the “*Bar Date Order*”)² establishing certain dates by which parties holding prepetition claims against the Debtors must file proofs of claim, including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code (“*Proofs of Claim*”).

For your convenience, enclosed with this notice (this “*Notice*”) is a Proof of Claim form, which identifies on its face the amount, nature, and classification of your claim(s), if any, listed in the Debtors’ schedules of assets and liabilities filed in these cases (the “*Schedules*”). If the Debtors believe that you hold claims against more than one Debtor, you will receive multiple Proof of Claim forms, each of which will reflect the nature and amount of your claim as listed in the Schedules.

As used in this Notice, the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons, estates, trusts, governmental units, and the Office of the United States Trustee for the Southern District of Texas. In addition, the terms “persons” and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “claim” means, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

I. THE BAR DATES

1. The Bar Date Order establishes the following bar dates for filing Proofs of Claim in these chapter 11 cases (the “*Bar Dates*”).

- a. *General Bar Date.* Pursuant to the Bar Date Order, except as described below, all entities (except governmental units) holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date, **including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code, are required to file Proofs of Claim by October 11, 2023, at 5:00 p.m. (CDT).** Except as

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

expressly set forth in this Notice and the Bar Date Order, the General Bar Date applies to all types of claims against the Debtors that arose prior to the Petition Date, including secured claims, unsecured priority claims, and unsecured non-priority claims.

- b. *Governmental Bar Date.* Pursuant to the Bar Date Order, **all governmental units holding claims against the Debtors that arose or are deemed to have arisen prior to the commencement of these cases on the Petition Date are required to file Proofs of Claim by the Governmental Bar Date (i.e., by November 28, 2023, at 5:00 p.m. (CST)).** The Governmental Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to the Petition Date, including governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party.
- c. *Rejection Damages Bar Date.* Pursuant to the Bar Date Order, all entities holding claims arising from the Debtors' rejection of executory contracts or unexpired leases are required to file Proofs of Claim by the Rejection Damages Bar Date, (i.e., by the date that is **the later of (i) the General Bar Date or the Governmental Bar Date**, as applicable, and **(ii) 5:00 p.m., prevailing Central Time, on the date that is 30 days following entry of the order approving the rejection of the applicable executory contract or unexpired lease** of the Debtors).
- d. *Amended Schedules Bar Date.* Pursuant to the Bar Date Order, all entities holding claims affected by the amendment to the Debtors' Schedules are required to file Proofs of Claim by the Amended Schedules Bar Date (i.e., by the date that is **the later of (i) the General Bar Date or the Governmental Bar Date**, as applicable, and **(ii) 5:00 p.m., prevailing Central Time, on the date that is 30 days from the date on which the Debtors provide notice of the amendment to the Schedules**).

The Bar Dates established by the Bar Date Order and referenced in this notice supersede any Bar Dates established, filed, noticed, or previously served in these chapter 11 cases.

II. WHO MUST FILE A PROOF OF CLAIM

2. Except as otherwise set forth herein, the following entities holding claims against the Debtors that arose (or that are deemed to have arisen) prior to the Petition Date **must** file Proofs of Claim on or before the General Bar Date, the Governmental Bar Date, or any other applicable bar date set forth in the Bar Date Order, as applicable:

- a. any entity whose claim against a Debtor is not listed in the applicable Debtor's Schedules;

- b. any entity whose claim against a Debtor is listed as contingent, unliquidated, or disputed in the applicable Debtor's Schedules;
- c. any entity that desires to have its claim allowed in a different classification or amount from the classification or identified in the applicable Debtor's Schedules;
- d. any entity that desires to have its claim allowed against a Debtor other than the Debtor on whose Schedules its claim is identified;
- e. any entity that desires its claim to be given administrative status pursuant to section 503(b)(9) of the Bankruptcy Code; and
- f. any present or former officer, manager, director, employee or independent contractor whose claim relates to any severance under an agreement that arose prior to the Petition Date or relates to any grievance that arose prior to the Petition Date (including for wrongful termination, discrimination, harassment, hostile work environment or retaliation).

III. PARTIES WHO DO NOT NEED TO FILE PROOFS OF CLAIM BY THE GENERAL BAR DATE

3. Certain parties are not required to file Proofs of Claim. The Court may, however, enter one or more separate orders at a later time requiring creditors to file Proofs of Claim for some kinds of the following claims and setting related deadlines. If the Court does enter such an order, you will receive notice of it. The following entities holding claims that would otherwise be subject to the Bar Dates, in the capacities described below, need **not** file Proofs of Claims:

- a. the U.S. Trustee, on account of claims for fees payable pursuant to 28 U.S.C § 1930;
- b. any entity that has already filed a signed proof of claim against the applicable Debtor with the Claims Agent on a form substantially similar to Official Form 410;
- c. any entity whose claim is listed on the Schedules if (i) the claim is **not** scheduled by the Debtors as disputed, contingent, or unliquidated; (ii) the entity agrees with the amount, nature, and priority of the claim as set forth in the Schedules; and (iii) the entity does not dispute that its claim is an obligation only of the specific Debtor on whose Schedules the claim is listed;
- d. any entity whose claim has already been allowed by a final order of the Court;
- e. any Debtor having a claim against another Debtor;

- f. any entity whose claim is solely against a non-Debtor (including a non-Debtor that is an affiliate of a Debtor);
- g. any entity whose claim has been paid in full by a Debtor pursuant to the Bankruptcy Code or in accordance with a Court order;
- h. a person who is or was an officer, manager, director, employee or independent contractor of the Debtors on or after the Petition Date, if an order of the Court authorizes the Debtors to honor its claim in the ordinary course of business as wages, commissions, benefits or severance; *provided* that (i) such a person must file a timely proof of claim as to any other claim that arose before the Petition Date (including for wrongful termination, discrimination, harassment, hostile work environment or retaliation) and (ii) such person must file a timely proof of claim as to any claim that cannot be paid pursuant to section 503(c) of the Bankruptcy Code;
- i. any current officer, manager, director, or employee for claims based on indemnification, contribution, or reimbursement; *provided* that any such person that is an employee, partner or other affiliate of Platinum Equity Advisors, LLC must file a timely proof of claim with respect to any known, non-contingent claim based on indemnification, contribution, or reimbursement; *provided further* that if, at any time prior to the effective date of a chapter 11 plan or closing of the Chapter 11 Cases, any such person is no longer an officer, manager, director, or employee of the Debtors, then such person shall be required to file a proof of claim within 30 days after the date when he or she is no longer an officer, manager, director, or employee;
- j. any entity holding a claim for which a separate deadline is fixed by the Court;
- k. any entity holding a claim that the Court exempts from filing a proof of claim, including pursuant to the *Final Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief* [ECF No. 396] (the “**DIP Order**”), including, for the avoidance of doubt, the Prepetition Secured Parties and the DIP Secured Parties (as defined in the DIP Order), which may (but are not required to) file master proofs of claim in accordance with paragraph 26 of the DIP Order;
- l. any entity holding a claim for fees, expenses or other obligations arising or payable under the DIP Order; and
- m. any entity holding a claim that is allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an actual, necessary cost or expense of preserving the Debtors’ estates, to the extent of the administrative claim; *provided* that an entity whose claim is entitled to priority under section

503(b)(9) must assert its claim by filing a request for payment or a proof of claim on or before the applicable Bar Date; and

- n. Wolverine Top Holding Corp. with respect to its equity interest in Wolverine Intermediate Holding Corp.

IV. INSTRUCTIONS FOR FILING PROOFS OF CLAIM

4. The following requirements shall apply with respects to filing and preparing each Proof of Claim:

- a. *Form.* Each proof of claim must be filed on Official Form 410 in substantially the form attached as **Exhibit 1** to the Bar Date Order (the “**Proof of Claim Form**”) or filed electronically on the Claims Agent website at <https://epoc.kccllc.net/incora>. In preparing the Proof of Claim Form, the Debtors have modified Official Form 410 to allow creditors to request payment of claims under section 503(b)(9) of the Bankruptcy Code.
- b. *Signatures.* Only **original** proofs of claim are acceptable for purposes of claims administration. Each proof of claim must be signed—in ink for a physical proof of claim or by electronic signature for an electronic proof of claim—by the claimant or by an authorized agent or legal representative of the claimant on the claimant’s behalf.
- c. *Contents.* Each proof of claim must be written or printed in legible English. Any liquidated claim amount that is asserted must be denominated in U.S. dollars. Each proof of claim must include supporting documentation in accordance with Bankruptcy Rules 3001(c) and 3001(d), except that, with written consent of Debtors’ counsel, a proof of claim may include a summary of voluminous documentation. To the extent that voluminous documentation is summarized, the claimant shall transmit such documentation to counsel to the Debtors or any other party in interest within 5 business days upon request.
- d. *Contents of Section 503(b)(9) Claim.* Any proof of claim that asserts priority under section 503(b)(9) of the Bankruptcy Code must also (i) include the value of the goods delivered to and received by the Debtors in the 20 days prior to the Petition Date, (ii) attach the particular invoices for which such claim is asserted, and (iii) attach documentation of any reclamation demand made to the Debtors under section 546(c) of the Bankruptcy Code.
- e. *Identification of Debtor.* Each proof of claim must clearly identify one specific Debtor against which it is asserted, including the specific Debtor’s case number. A proof of claim that is filed without specifying a particular Debtor, or that is filed under the lead case number (No. 23-90611), or that is filed against multiple Debtors will be deemed as filed only against Wesco Aircraft Holdings, Inc.

- f. *Delivery.* Each proof of claim must be filed, including supporting documentation through one of the following methods: (i) through the Claims Agent's electronic filing system at <https://epoc.kccllc.net/incora>; or (ii) by first class mail, overnight mail or hand delivery, to the following address: Incora Claims Processing Center, c/o KCC, 222 N. Pacific Coast Hwy., Ste. 300, El Segundo, CA 90245. Proofs of claim submitted by fax or email will not be accepted. Claimants who deliver a physical proof of claim to the Claims Agent and wish to receive acknowledgement of the submission must also deliver to the Claims Agent a copy of the Proof of Claim Form (in addition to the original Proof of Claim Form) and a self-addressed stamped envelope.
- g. *Timing.* Each proof of claim must be delivered in the foregoing manner, either through the Claims Agent's electronic filing system or by physical delivery to the Claims Agent, so that the proof of claim is **actually received** by the Claims Agent on or before the applicable Bar Date.

V. CONSEQUENCES OF FAILING TO TIMELY FILE YOUR PROOF OF CLAIM

5. Pursuant to the Bar Date Order and in accordance with Bankruptcy Rule 3003(c)(2), **if you are required to file a Proof of Claim but fail to file a timely Proof of Claim in accordance with the Bar Date Order** with respect to any claim:

- a. **you will be forever barred, estopped and enjoined from asserting your claim against the Debtors (or filing a Proof of Claim with respect to your claim);**
- b. **the Debtors and their property will be forever discharged from any and all indebtedness or liability with respect to or arising from your claim;**
- c. **you will not receive any distribution in these Chapter 11 Cases on account of your claim; and**
- d. **you will not be permitted to vote on any plan or plans of reorganization an account of your claim, and you may not receive further notices regarding the Chapter 11 Cases.**

VI. RESERVATION OF RIGHTS

6. Nothing contained in this Notice is intended to or should be construed as a waiver of the Debtors' right to: (a) dispute, or assert offsets or defenses against, any filed claim or any claim listed or reflected in the Schedules as to the nature, amount, liability, or classification thereof; (b) subsequently designate any scheduled claim as disputed, contingent, or unliquidated; and (c) otherwise amend or supplement the Schedules.

VII. THE DEBTORS' SCHEDULES

7. You may be listed as the holder of a claim against one or more of the Debtor entities in the Debtors' Schedules. To determine if and how you are listed on the Schedules, please refer to the descriptions set forth on the enclosed Proof of Claim forms regarding the nature, amount, and status of your claim(s), if any. If the Debtors believe that you may hold claims against more than one Debtor entity, you will receive multiple Proof of Claim forms, each of which will reflect the nature and amount of your claim against one Debtor entity, as listed in the Schedules.

8. If you rely on the Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules. However, you may rely on the enclosed form, which: (a) sets forth the amount of your claim (if any) as scheduled; (b) identifies the Debtor entity against which it is scheduled; (c) specifies whether your claim is listed in the Schedules as disputed, contingent, or unliquidated; and (d) identifies whether your claim is scheduled as a secured, unsecured priority, or unsecured non-priority claim.

9. As described above, if you agree with the nature, amount, and status of your claim as listed in the Debtors' Schedules, and if you do not dispute that your claim is only against the Debtor entity specified by the Debtors, and if your claim is not described as "disputed," "contingent," or "unliquidated," you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice.

VIII. ADDITIONAL INFORMATION

10. Copies of the Debtors' Schedules, the Bar Date Order, and other information regarding these chapter 11 cases are available for inspection free of charge on the Debtors' website at <https://www.kccllc.net/incora>. The Schedules and other filings in these chapter 11 cases also are available for a fee at the Court's website at <https://ecf.txsb.uscourts.gov/>. A login identification and password to the Court's Public Access to Court Electronic Records ("**PACER**") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Copies of the Schedules and other documents filed in these

cases also may be examined between the hours of 8:00 a.m. and 5:00 p.m., prevailing Central Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of Texas, United States Courthouse, 515 Rusk Avenue, Houston, Texas 77002.

11. If you require additional information regarding the filing of a Proof of Claim, you may contact the Debtors' restructuring hotline at (888) 251-2937 (U.S./Canada toll-free) or +1 (310) 751-2613 (international) or submit an inquiry online at <http://www.kccllc.net/incora/inquiry>.

A holder of a possible claim against the Debtors should consult an attorney regarding any matters not covered by this notice, such as whether the holder should file a Proof of Claim.

Dated: September 11, 2023

/s/ Dennis F. Dunne

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