

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

In re:)	Chapter 11
)	
WESCO AIRCRAFT HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 23-90611 (MI)
)	
Debtors.)	(Jointly Administered)
)	

**LIMITED OBJECTION OF PARKER-HANNIFIN CORPORATION AND
ITS AFFILIATES TO DEBTORS' FIFTH AND EIGHTH OMNIBUS
NOTICE OF SATISFACTION OF CLAIMS**

Parker-Hannifin Corporation, Parker Hannifin GmbH, and Meggitt Aerospace Limited, trading as Meggitt Polymers & Composites (“Meggitt” and such entities and their various unincorporated divisions, collectively, “Parker”), by their undersigned attorneys, hereby submits this limited objection (this “Objection”) out of an abundance of caution to the *Fifth Omnibus Notice of Satisfaction of Claims* [Docket No. 1539] (the “Fifth Satisfaction Notice”) and the *Eighth Omnibus Notice of Satisfaction of Claims* [Docket No. 1542] (the “Eighth Satisfaction Notice” and collectively with the Fifth Satisfaction Notice, the “Satisfaction Notices”). In support of this Objection, Parker states the following:

I. Background

1. On June 1, 2023 (the “Petition Date”), the above-captioned debtors (the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

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 <http://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.



2. Prior to the Petition Date, Parker sold goods and products to various Debtors. Meggitt also provided goods and products to certain Rolls-Royce entities pursuant to a long-term supply contract which the Debtors administer on behalf of Rolls-Royce.

3. On or about August 16, 2023, Parker and the Debtors entered into a Vendor Payment Agreement wherein the parties agreed, *inter alia*, to pay certain mutual debts owing to each other, including certain prepetition debts.

4. Parker timely filed claims against the Debtors including claim Nos: 1477, 1480, 1482 and 1515 (collectively, the “Parker Claims”).

5. On March 13, 2024, the Debtors filed the Satisfaction Notices asserting that the Debtors satisfied certain of the Parker entities’ claims, including the Parker Claims.

II. Limited Objection

6. Parker’s mutual supply relationship with the Debtors is large and spans numerous Parker entities, affiliates and unincorporated divisions. This expansive relationship is with numerous Debtor entities, including Pattonair USA, Inc., Wesco Aircraft Hardware Corp., NetMRO, LLC, and Haas Group International, LLC. Parker is in the process of reviewing its books and records to reconcile the various payments received pursuant to the Vendor Payment Agreement and as asserted in the Satisfaction Notices. Parker does not dispute that certain payments were made by the Debtors as asserted. However, until all outstanding claims and payments received by the Parker entities are fully reconciled, Parker objects to the Satisfaction Notices.

7. Parker remains in steady contact with the Debtors who understand Parker is in the process of reconciling any outstanding amounts owed and payments received.

8. Parker reserves the right to amend this Objection.

WHEREFORE, for or the foregoing reasons and any additional reasons stated at a hearing on this matter, and the Court should hold in abeyance any effect the Satisfaction Notices may have on the Parker Claims and provide such other and further relief as is just and proper.

Dated: April 12, 2024

/s/ Sean A. Gordon

Sean A. Gordon

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its Affiliates*

CERTIFICATE OF SERVICE

I, Sean Gordon, hereby certify that, on this 12th day of April 2024, I caused a true and correct copy of the foregoing *Limited Objection of Parker-Hannifin Corporation and Its Affiliates to Debtors' Fifth and Eighth Omnibus Notice of Satisfaction of Claims* to be served via CM/ECF on all parties who have registered for electronic service in these cases.

Dated: April 12, 2024

/s/ Sean Gordon