

**ENTERED**

September 11, 2023

Nathan Ochsner, Clerk

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

*In re*

**WESCO AIRCRAFT HOLDINGS, INC.,**

*et al.*<sup>1</sup>

Debtors.

Case No. 23-23-90611 (DRJ)

Chapter 11

(Jointly Administered)

**ORDER (I) SETTING  
BAR DATES FOR FILING  
PROOFS OF CLAIM, (II) APPROVING  
THE FORM OF PROOFS OF CLAIM AND THE  
MANNER OF FILING, (III) APPROVING NOTICE OF  
BAR DATES, AND (IV) GRANTING RELATED RELIEF**

(Docket No. 605)

<sup>1</sup> 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.kcellc.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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Upon the motion (the “*Motion*”),<sup>2</sup> of the above-captioned debtors (collectively, the “*Debtors*”), for entry of an order (this “*Bar Date Order*”) (a) establishing the General Bar Date; (b) establishing the Governmental Bar Date; (c) establishing the Rejection Damages Bar Date; (d) establishing the Amended Schedules Bar Date; (e) approving the form and manner for filing such claims, including requests for payment under section 503(b)(9) of the Bankruptcy Code; (f) approving notice of the Bar Dates; and (g) granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction to decide the Motion and to enter this Order pursuant to 28 U.S.C. § 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, such notice being adequate and appropriate under the circumstances; and after notice and a hearing, as defined in section 102 of the Bankruptcy Code; and this Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Order; and it appearing that entry of this Order is in the best interests of the Debtors’ estates; it is hereby **ORDERED** that:

#### **I. THE BAR DATES**

1. Each entity<sup>3</sup> that asserts a claim against any of the Debtors that arose before the Petition Date, including requests for payment under section 503(b)(9) of the Bankruptcy Code, shall be required to file an original, written proof of claim (a “*Proof of Claim*”), on Official Form 410 substantially in the form attached to this Order as **Exhibit 1** (the “*Proof of Claim Form*”) or electronically on the Claims Agent website at <https://epoc.kccllc.net/incora>.

<sup>2</sup> Capitalized terms used but not defined in this Order have the meanings ascribed to them in the Motion.

<sup>3</sup> Except as otherwise defined in this Order or in the Motion, all terms specifically defined in the Bankruptcy Code shall have those meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the term “claim” has the meaning given to it in section 101(5) of the Bankruptcy Code; (b) the term “entity” (including individuals, partnerships, corporations, joint ventures, and trusts) has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term “governmental unit” has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term “person” has the meaning given to it in section 101(41) of the Bankruptcy Code.

2. Except in the cases of governmental units and certain other exceptions explicitly set forth herein, **October 11, 2023, at 5:00 p.m. (CDT)** (the “**General Bar Date**”) is the deadline for each entity to file a Proof of Claim for any prepetition claim (including any request for payment under section 503(b)(9) of the Bankruptcy Code), other than a claim that is governed by a more specific Bar Date set forth below or that is exempt from filing a Proof of Claim pursuant to the Bar Date Order.

3. Except in the case of exceptions explicitly set forth herein, **November 28, 2023, at 5:00 p.m. (CST)** (the “**Governmental Bar Date**”) is the deadline for all governmental units to file a Proof of Claim for any prepetition claim (whether secured, unsecured priority, or unsecured non-priority), including requests for payment pursuant to section 503(b)(9) of the Bankruptcy Code, and including claims for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which any of the Debtors were a party, other than a claim that is governed by a more specific Bar Date set forth below or that is exempt from filing a Proof of Claim pursuant to the Bar Date Order.

4. Unless otherwise ordered, all entities asserting claims arising from the Debtors’ rejection of executory contracts or unexpired leases shall file a Proof of Claim on account of such rejection by the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, and (b) **5:00 p.m., prevailing Central Time**, on the date that is 30 days following entry of the order approving the Debtors’ rejection of the applicable executory contract or unexpired lease (the “**Rejection Damages Bar Date**”).

5. If any of the Debtors amend their schedules of assets and liabilities (the “**Schedules**”) after having given notice of the Bar Dates (as defined herein), the deadline for any entity adversely affected by the amendment, which has not then filed a proof of claim, to file a proof of claim for any prepetition claim (including any request for payment under section 503(b)(9) of the Bankruptcy Code) whose subject matter is related to the amendment, shall be 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 (such later date, the “*Amended Schedules Bar Date*” and, together with the General Bar Date, the Governmental Bar Date, and the Rejection Damages Bar Date, as applicable, the “*Bar Date*” or “*Bar Dates*”).

6. All Proofs of Claim must be filed or submitted so as to be *actually received* by the Claims and Noticing Agent on or before the applicable Bar Date. If Proofs of Claim are not received by the Claims and Noticing Agent on or before the applicable Bar Date, except in the case of certain exceptions explicitly set forth herein, the holders of the underlying claims shall be barred from asserting such claims against the Debtors and precluded from voting on any plans of reorganization filed in these chapter 11 cases and/or receiving distributions from the applicable Debtor on account of such claims in these chapter 11 cases.

7. The Bar Dates established by this Bar Date Order supersede any bar dates established, filed, noticed, or previously served in these chapter 11 cases.

## **II. PROOFS OF CLAIM**

### **A. Who Must File**

8. The following categories of claimants, in the capacities described below, shall be required to file a Proof of Claim by the Bar Date:

- 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).

9. The following categories of claimants, in the capacities described below, shall not be required to file a Proof of Claim by the Bar Date:

- 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 this 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 this 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 this Court;
- k. any entity holding a claim that this 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;
- 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.

## **B. Procedures for Filing**

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

- a. *Form.* Each proof of claim must be filed on 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. For the avoidance of doubt, to the extent the Prepetition Secured Parties file a Master Proof of Claim (each as defined in the DIP Order), pursuant to paragraph 26 of the DIP Order, the Master Proof of Claim shall not be required to attach any instruments, agreements or other documents evidencing the obligations owing by each of the Debtors to the applicable Prepetition Secured Parties, which instruments, agreements or other documents will be provided upon written request to counsel to the applicable Prepetition Secured Notes Trustee or the Prepetition ABL Agent, as applicable.
- 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. Notwithstanding anything to the contrary in this Bar Date Order, any provision of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any order of this Court, any Proof of Claim Form or any Bar Date Notice, ACE American Insurance Company, on its own behalf and on behalf of all of its U.S.-based affiliates and successors (collectively, the "**Chubb Companies**"), may file a single consolidated Proof of Claim based on the insurance policies issued by any of the Chubb Companies to (or providing coverage to) the Debtors (or their predecessors) and any agreements related to those insurance policies (the "**Chubb Consolidated Claim**") in the chapter 11 case of Wesco Aircraft Holdings, Inc., Case No. 23-90611 (the "**Lead Case**"), which shall be deemed filed by each of the Chubb Companies (to the extent specified in the Chubb Consolidated Claim) not only in the Lead Case, but also in the chapter 11 case of each of the Debtors specified in the Chubb Consolidated Claim. Nothing contained in this paragraph shall be construed as a waiver or modification of any rights, claims or defenses, including, without limitation, the right of the Chubb Companies to (i) assert joint and several liability against some or all of the

Debtors, (ii) modify the Debtor(s) against which the Chubb Consolidated Claim is asserted, or (iii) amend the amount or nature of the Chubb Consolidated Claim, and, for the avoidance of doubt, any amendments that the Chubb Companies may make to the Chubb Consolidated Claim may be filed by ACE American Insurance Company, on its own behalf and on behalf of all of the Chubb Companies and submitted only in the Lead Case (instead of in the chapter 11 cases of each or any of the other Debtors); *provided, however*, that the Chubb Consolidated Claim shall not be disallowed, reduced or expunged solely on the basis that the Chubb Consolidated Claim is filed (1) only in the Lead Case (instead of in the bankruptcy cases of each or any of the other Debtors that are specified in the Chubb Consolidated Claim), and/or (2) only by ACE American Insurance Company (instead of by each of the Chubb Companies that is specified in the Chubb Consolidated Claim). For the avoidance of doubt, nothing in this paragraph shall relieve the Chubb Companies of any requirement under the Bar Date Order that is not specifically modified by this paragraph, including the requirement to file a Proof of Claim at or before the applicable Bar Date.

- 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.
- h. *Master Proofs of Claim.* Notwithstanding anything herein to the contrary, BOKF, NA or any successor thereto (collectively, the “*Indenture Trustee*”), individually and in their capacity as Indenture Trustee under the indentures (as may be supplemented from time to time) dated as of: (i) November 27, 2019 (the “*2024 Indenture*”), pursuant to which Debtor Wesco Aircraft Holdings, Inc. (the “*Company*”) issued 8.50% Senior Notes Due 2024 (the “*2024 Notes*”); (ii) November 27, 2019, (the “*2026 Indenture*”), pursuant to which the Company issued 9.00% Senior Notes Due 2026 (the “*2026 Notes*”); and (iii) November 27, 2019 (the “*2027 Indenture*,” together with the 2024 Indenture and the 2026 Indenture, the “*Indentures*”) pursuant to which the Company issued 13.125% Senior Notes Due 2027 (the “*2027 Notes*,” together with the 2024 Notes and the 2026 Notes, the “*Notes*”), is hereby authorized, but not required, to file a single master Proof of Claim (the

“**Master Proof of Claim**”) in the case of Wesco Aircraft Holdings, Inc., Case No. 23-90611 (DRJ), which shall be deemed to constitute the filing of a Proof of Claim against all Debtors under each and/or any applicable Indenture on account of all holders of claims related to or arising under each and/or any of the Indentures and/or the Notes or as otherwise provided under the applicable Indentures and Notes or any ancillary or related document, instrument or agreement or otherwise under law or equity, whether under tort, contract or otherwise, for any and all claims whatsoever including but not limited to the repayment of principal, interest, fees, expenses, and any other amounts arising under or in connection with the applicable Indentures, the Notes, or otherwise; *provided however*, that any holder wishing to assert a claim not arising out of or relating to the applicable Indentures and/or the Notes must file a Proof of Claim with respect to such claim on or before the applicable Bar Date; *provided further* that in lieu of attaching voluminous documentation, including but not limited to the Indentures, the Notes, and/or documentation for compliance with Bankruptcy Rule 3001(d), the Indenture Trustee may include a summary of applicable Indentures and/or the Notes with respect to the Master Proof of Claim with regard to all of the claims thereunder. For the avoidance of doubt, the failure of the Indenture Trustee to file any Proof of Claim, including but not limited to any Master Proof of Claim, shall not affect the validity, priority, amount, extent, or enforceability of any of the applicable Indentures, the Notes, or any claims arising thereunder. In the event the resignation of BOKF, NA, as indenture trustee for the 2024 Notes and the 2026 Notes, and appointment of UMB Bank, NA, as successor indenture trustee for the 2024 Notes and the 2026 Notes, is not effective by September 20, 2023, then the General Bar Date for BOKF and the Ad Hoc Bondholder Group with respect to the 2024 Notes and the 2026 Notes shall be extended to November 1, 2023, or such later date as set by the Court or agreed to by the Debtors.

- i. *Ad Hoc Bondholder Group*. Each of the investment advisors or managers, or any affiliate of such investment advisors or managers, for the beneficial holders comprising the Ad Hoc Group of 2024 and 2026 Noteholders (the “**Ad Hoc Bondholder Group**”), as identified on the Verified Statement of the Ad Hoc Group of 2024 and 2026 Noteholders Pursuant to Bankruptcy Rule 2009 (the “**Verified Statement**”) [ECF No. 263] may, but shall not be required to, file a consolidated Proof of Claim on account of the claims of each of the beneficial holders managed, advised or controlled by such investment advisors or managers, or their affiliates, identified in Exhibit A to the Verified Statement (the “**Ad Hoc Group Bondholder Claims**”); provided, however, that the Ad Hoc Group Bondholder Claims shall set forth in reasonable detail the basis and amount of the claims asserted by each beneficial holder against each Debtor. The Ad Hoc Group Bondholder Claims shall be deemed valid Proofs of Claim against each Debtor described in each Ad Hoc Bondholder Claim and the members of the Ad Hoc Bondholder Group shall not be required to file a Proof of Claim in the separate case of each such Debtor; provided however, that in lieu of attaching voluminous documentation,

including but not limited to the Indentures, the Notes, and/or documentation for compliance with Bankruptcy Rule 3001(d), the members of the Ad Hoc Bondholder Group may include a summary of applicable Indentures and/or the Notes.

**C. Consequences of Failing to File**

11. Any person or entity that fails to file a timely proof of claim that is required by the Bar Date Order shall be barred, estopped and enjoined from asserting its claim against the Debtors or their estates (and from filing or amending a proof of claim to assert such a claim), and the Debtors and their property and estates shall be discharged from any indebtedness or liability with respect to or arising from such a claim, including with respect to any claims that would otherwise be entitled to priority under section 503(b)(9) of the Bankruptcy Code. Such a person or entity shall also be prohibited from voting to accept or reject any plan of reorganization in these Chapter 11 Cases on account of such a claim or participating in any distribution in these Chapter 11 Cases on account of such a claim, and shall not be entitled to receive further notices on account of such a claim. Such a person or entity shall not be treated as a creditor with respect to such a claim for any purpose in these Chapter 11 Cases.

**III. NOTICE PROCEDURES**

**A. Mailing of Bar Date Notices**

12. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors shall cause written notice of the Bar Dates to be mailed via first-class mail to the entities listed below (or their respective counsel, if known). The notice will be in substantially the form attached to the Bar Date Order as **Exhibit 2** (the “*Bar Date Notice*”) and will be accompanied by a Proof of Claim Form (together, the “*Bar Date Package*”).

- a. the U.S. Trustee;
- b. counsel to the official committee of unsecured creditors;
- c. Davis Polk & Wardwell LLP, as counsel to the First Lien Noteholder Group;
- d. the administrative and collateral agent under the Debtors’ prepetition ABL facility;

- e. the indenture trustees under each of the Debtors' prepetition indentures;
- f. all creditors and other known holders of claims or purported claims against the Debtors as of the date of entry of the Bar Date Order, including all entities listed in the Schedules as holding claims against the Debtors;
- g. all entities that have requested notice of proceedings in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002, as of the date of entry of the Bar Date Order;
- h. all entities that have filed proofs of claim in these Chapter 11 Cases as of the date of entry of the Bar Date Order;
- i. all known non-Debtor equity holders or interest holders of the Debtors as of the date of entry of the Bar Date Order;
- j. all entities that are party to executory contracts or unexpired leases with the Debtors
- k. all entities that are party to active litigation with the Debtors;
- l. all current and former employees (to the extent that contact information for former employees is available in the Debtors' records);
- m. all regulatory authorities that regulate the Debtors' businesses;
- n. the attorney general for the State of Texas and each other state in which the Debtors conduct business;
- o. the Office of the U.S. Attorney for the Southern District of Texas;
- p. the District Director of the Internal Revenue Service for the Southern District of Texas;
- q. all other taxing authorities for the jurisdictions in which the Debtors maintain or conduct business;
- r. all other entities listed on the Debtors' matrix of creditors; and
- s. the Securities and Exchange Commission.

13. The Debtors shall provide each Scheduled creditor with a personalized Proof of Claim Form that sets forth (a) which Debtor the creditor's claim has been Scheduled against, (b) the Scheduled amount of the claim, if any, (c) whether the claim is Scheduled as contingent, unliquidated or disputed, and (d) whether the claim is Scheduled as secured, unsecured priority, or unsecured non-priority. However, the Debtors' failure to provide any creditor with a personalized

Proof of Claim Form shall not excuse that creditor from filing a proof of claim, if required by the Bar Date Order. Each creditor that receives a personalized Proof of Claim Form may correct any information that it believes is missing, incorrect or incomplete.

**B. Supplemental Mailings**

14. After the initial mailing of the Bar Date Package, the Debtors may, in their discretion, make supplemental mailings of notices, including in the event that: (a) notices are returned by the post office with forwarding addresses;<sup>4</sup> (b) certain parties acting on behalf of parties in interest (*e.g.*, banks and brokers) decline to distribute notices to these parties and instead return their names and addresses to the Debtors for direct mailing; and (c) additional potential claimants or parties in interest become known to the Debtors. In this regard, the Debtors are permitted to make supplemental mailings of the Bar Date Package in these and similar circumstances at any time up to 14 days in advance of the applicable Bar Date, with any such mailings being deemed timely and the Bar Date being applicable to the recipient creditors.

**C. Publication Notice**

15. The Debtors shall cause notice of the General Bar Date and the Governmental Bar Date to be given by publication to creditors to whom notice by mail is impracticable, including creditors who are unknown or not reasonably ascertainable by the Debtors and creditors whose identities are known but whose addresses are unknown by the Debtors. Specifically, the Debtors shall cause the Bar Date Notice to be published as soon as reasonably practicable after entry of the Bar Date Order and in accordance with Bankruptcy Rule 2002(l), modified for publication in substantially the form attached hereto as **Exhibit 3** (the “**Publication Notice**”), on one occasion in the national edition of the *New York Times* and the *Financial Times* (global edition), and any such other local publications that the Debtors deem appropriate and disclose in the Claims and Noticing Agent’s affidavit of service.

<sup>4</sup> To the extent that any notices are returned as “return to sender” without a forwarding address, the Debtors request that they not be required to mail additional notices to such persons and that publication notice be deemed sufficient as to them.

**IV. MISCELLANEOUS ORDERS**

16. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, the terms of this Order shall be immediately effective and enforceable upon its entry.

17. The Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Order.

18. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation or enforcement of this Order.

**Signed: September 11, 2023.**

  
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**DAVID R. JONES**  
**UNITED STATES BANKRUPTCY JUDGE**

**EXHIBIT 1 TO BAR DATE ORDER**  
**PROOF OF CLAIM FORM**

United States Bankruptcy Court for the Southern District of Texas, Houston Division

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Wesco Aircraft Holdings, Inc. (Case No. 23-90611)            | <input type="checkbox"/> Haas TCM Industries LLC (Case No. 23-90689)     | <input type="checkbox"/> Wesco 1 LLP (Case No. 23-90675)                                   |
| <input type="checkbox"/> Adams Aviation Supply Company Ltd. (Case No. 23-90666)       | <input type="checkbox"/> Haas TCM of Israel Inc. (Case No. 23-90703)     | <input type="checkbox"/> Wesco 2 LLP (Case No. 23-90676)                                   |
| <input type="checkbox"/> Flintbrook Limited (Case No. 23-90695)                       | <input type="checkbox"/> Interfast USA Holdings Inc. (Case No. 23-90684) | <input type="checkbox"/> Wesco Aircraft Canada Inc. (Case No. 23-90694)                    |
| <input type="checkbox"/> Haas Chemical Management of Mexico, Inc. (Case No. 23-90696) | <input type="checkbox"/> NetMRO, LLC (Case No. 23-90685)                 | <input type="checkbox"/> Wesco Aircraft Canada, LLC (Case No. 23-90688)                    |
| <input type="checkbox"/> Haas Corporation of Canada (Case No. 23-90693)               | <input type="checkbox"/> Pattonair (Derby) Limited (Case No. 23-90668)   | <input type="checkbox"/> Wesco Aircraft EMEA, Ltd. (Case No. 23-90705)                     |
| <input type="checkbox"/> Haas Corporation of China (Case No. 23-90697)                | <input type="checkbox"/> Pattonair Europe Limited (Case No. 23-90669)    | <input type="checkbox"/> Wesco Aircraft Europe Limited (Case No. 23-90706)                 |
| <input type="checkbox"/> Haas Group Canada Inc. (Case No. 23-90698)                   | <input type="checkbox"/> Pattonair Group Limited (Case No. 23-90670)     | <input type="checkbox"/> Wesco Aircraft Hardware Corp. (Case No. 23-90677)                 |
| <input type="checkbox"/> Haas Group International SCM Limited (Case No. 23-90699)     | <input type="checkbox"/> Pattonair Holding, Inc. (Case No. 23-90686)     | <input type="checkbox"/> Wesco Aircraft International Holdings Limited (Case No.23-90707)  |
| <input type="checkbox"/> Haas Group International, LLC (Case No. 23-90691)            | <input type="checkbox"/> Pattonair Holdings Limited (Case No. 23-90671)  | <input type="checkbox"/> Wesco Aircraft SF, LLC (Case No. 23-90687)                        |
| <input type="checkbox"/> Haas Group, LLC (Case No. 23-90667)                          | <input type="checkbox"/> Pattonair Limited (Case No. 23-90672)           | <input type="checkbox"/> Wesco LLC 1 (Case No. 23-90678)                                   |
| <input type="checkbox"/> Haas Holdings, LLC (Case No. 23-90690)                       | <input type="checkbox"/> Pattonair USA, Inc. (Case No. 23-90604)         | <input type="checkbox"/> Wesco LLC 2 (Case No. 23-90679)                                   |
| <input type="checkbox"/> Haas International Corporation (Case No. 23-90700)           | <input type="checkbox"/> Pioneer Finance Corporation (Case No. 23-90682) | <input type="checkbox"/> Wolverine Intermediate Holding Corporation (Case No. 23-90680)    |
| <input type="checkbox"/> Haas of Delaware LLC (Case No. 23-90692)                     | <input type="checkbox"/> Pioneer Holding Corporation (Case No. 23-90704) | <input type="checkbox"/> Wolverine Intermediate Holding II Corporation (Case No. 23-90681) |
| <input type="checkbox"/> Haas TCM de Mexico, S. de R.L. de C.V. (Case No.23-90701)    | <input type="checkbox"/> Quicksilver Midco Limited (Case No. 23-90673)   | <input type="checkbox"/> Wolverine UK Holdco Limited (Case No. 23-90683)                   |
| <input type="checkbox"/> Haas TCM Group of the UK Limited (Case No. 23-90702)         | <input type="checkbox"/> UNISEAL, Inc. (Case No. 23-90674)               |  |

**Official Form 410  
Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	_____ Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
<b>2. Has this claim been acquired from someone else?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
<b>3. Where should notices and payments to the creditor be sent?</b>	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name _____	Name _____
	Number _____ Street _____	Number _____ Street _____
	City _____ State _____ ZIP Code _____	City _____ State _____ ZIP Code _____
	Country _____	Country _____
	Contact phone _____	Contact phone _____
	Contact email _____	Contact email _____
	Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	
<b>4. Does this claim amend one already filed?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. **Do you have any number you use to identify the debtor?**  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_ \_ \_ \_ \_

7. **How much is the claim?**  
 \$ \_\_\_\_\_ **Does this amount include interest or other charges?**  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?** Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
 Limit disclosing information that is entitled to privacy, such as health care information.  
 \_\_\_\_\_

9. **Is all or part of the claim secured?**  No  
 Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amount should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. **Is this claim based on a lease?**  No  
 Yes. **Amount necessary to cure any default as of the date of the petition.** \$ \_\_\_\_\_

11. **Is this claim subject to a right of setoff?**  No  
 Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

No

Yes. Check all that apply:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date \_\_\_\_\_  
MM / DD / YYYY

\_\_\_\_\_  
Signature

**Print the name of the person who is completing and signing this claim:**

Name \_\_\_\_\_  
First name Middle name Last name

Title \_\_\_\_\_

Company \_\_\_\_\_  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_  
Number Street

City State ZIP Code Country

Contact phone \_\_\_\_\_ Email \_\_\_\_\_

## Official Form 410

**Instructions for Proof of Claim**

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157 and 3571

**How to fill out this form**

- **Fill in all of the information about the claim as of the date the case was filed.**
- **Fill in the caption at the top of the form**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **Attach any supporting documents to this form.**  
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)  
Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **If the claim is based on delivery health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.**

**PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:**

Incora Claims Processing Center  
c/o KCC  
222 N. Pacific Coast Hwy., Ste. 300  
El Segundo, CA 90245

Alternatively, your claim can be filed electronically on KCC's website at <https://epoc.kccllc.net/incora>.

- **A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth.** See Bankruptcy Rule 9037.
- **For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.**  
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

**Confirmation that the claim has been filed**

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent's website at <http://www.kccllc.net/incora>

**Understand the terms used in this form**

**Administrative expense:** Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing that bankruptcy estate.  
11 U.S.C. § 503

**Claim:** A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

**Claim Pursuant to 11 U.S.C. §503(b)(9):** A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

**Creditor:** A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

**Debtor:** A person, corporation, or other entity to who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

**Evidence of perfection:** Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

**Information that is entitled to privacy:** A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

**Priority claim:** A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

**Proof of claim:** A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

**Redaction of information:** Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

**Do not file these instructions with your form.**

**Secured claim under 11 U.S.C. §506(a):** A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

**Setoff:** Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

**Uniform claim identifier:** An optional 24-character identifier that some creditors use to facilitate electronic payment.

**Unsecured claim:** A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

### **Offers to purchase a claim**

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

**EXHIBIT 2 TO BAR DATE ORDER**

**BAR DATE NOTICE**

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

*In re*

**WESCO AIRCRAFT HOLDINGS, INC.,  
*et al.*,<sup>1</sup>**

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

<sup>1</sup> 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.

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 [●], 2023 the Court entered an order [Docket No. [●]] (the “*Bar Date Order*”)<sup>2</sup> 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

<sup>2</sup> 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.txs.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: August 8, 2023

*/s/ Dennis F. Dunne*

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and Debtors in Possession*

**EXHIBIT 3 TO BAR DATE ORDER**  
**PUBLICATION NOTICE**

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

*In re*

**WESCO AIRCRAFT HOLDINGS, INC.,  
et al.,<sup>1</sup>**

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**

**The General Bar Date is  
October 11, 2023, at 5:00 p.m. (CDT)**

**The Governmental Bar Date is  
November 28, 2023, at 5:00 p.m. (CST)**

**PLEASE TAKE NOTICE:**

**Deadlines for Filing Proofs of Claim.** On [●], 2023, the United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) entered an order [Docket No. [●]] (the “*Bar Date Order*”) establishing certain deadlines for the filing of proofs of claim, including requests for payment under section 503(b)(9) of the Bankruptcy Code (“*Proofs of Claim*”), in these chapter 11 cases of the following debtors and debtors in possession (collectively, the “*Debtors*”):

DEBTOR	CASE NO.
Wesco Aircraft Holdings, Inc.	23-90611
Adams Aviation Supply Co. Ltd.	23-90666

<sup>1</sup> 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.kcellc.net/Incora>. The service address for each of the Debtors in these cases is 2601 Meacham Blvd., Ste. 400, Fort Worth, TX 76137.

DEBTOR	CASE NO.
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
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

**The Bar Dates.** Pursuant to the Bar Date Order, **all** entities (except governmental units), including individuals, partnerships, estates, and trusts that have a claim or potential claim against the Debtors that arose prior to June 1, 2023, no matter how remote or contingent such right to payment or equitable remedy may be, including requests for payment under section 503(b)(9) of the Bankruptcy Code, **must file a Proof of Claim** on or before **October 11, 2023, at 5:00 p.m. (CDT)** (the “*General Bar Date*”). Governmental entities that have a claim or potential claim against the Debtors that arose prior to June 1, 2023, no matter how remote or contingent such right to payment or equitable remedy may be, **must file a Proof of Claim** on or before **November 28, 2023, at 5:00 p.m. (CST)** (the “*Governmental Bar Date*”). All entities holding claims arising from the Debtors’ rejection of executory contracts and unexpired leases are required to file Proofs of Claim by **the date that is the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, and (b) the date that is 30 days following entry of the order approving the Debtors’ rejection of the applicable executory contract or unexpired lease** (the “*Rejection Damages Bar Date*”). All entities holding claims affected by an amendment to the Debtors’ schedules of assets and liabilities filed in these cases (the “*Schedules*”) are required to file Proofs of Claim, by **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 “*Amended Schedules Bar Date*”).

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.

**Any person or entity who fails to file a Proof of Claim, including any request for payment under section 503(b)(9) of the Bankruptcy Code, on or before the General Bar Date or the Governmental Bar Date, as applicable, will not be treated as a creditor with respect to such claim for the purposes of voting and distribution on any chapter 11 plan.**

**Filing a Proof of Claim.** Each proof of claim must be filed, including supporting documentation through one of the following methods: (a) through the Claims Agent’s electronic filing system at <https://epoc.kccllc.net/incora>; or (b) 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.

**Additional Information.** If you have any questions regarding the claims process and/or you wish to obtain a copy of the Bar Date Notice, a proof of claim form or related documents you may do so by: (a) calling the Debtors’ restructuring hotline at (888) 251-2937 (U.S./Canada toll-free); or +1 (310) 751-2613 (international); or (b) visiting the Debtors’ restructuring website at <https://www.kccllc.net/incora>.