

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

<p>In re:</p> <p>AVENGER FLIGHT GROUP, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 26-10183 ()</p> <p>(Joint Administration Requested)</p>
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**MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO
(A) FILE A CONSOLIDATED LIST OF THE DEBTORS’ THIRTY LARGEST
UNSECURED CREDITORS, AND (B) REDACT CERTAIN PERSONALLY
IDENTIFIABLE INFORMATION FOR INDIVIDUAL CREDITORS; (II) APPROVING
THE NOTICE OF COMMENCEMENT AND SERVICE THEREOF; AND
(III) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors-in-possession (the “Debtors”) file this motion (the “Motion”) for the entry of an order, substantially in the form attached hereto as **Exhibit A**: (i) authorizing the Debtors to (a) file a consolidated list of the Debtors’ thirty largest unsecured creditors in lieu of filing lists for each Debtor, and (b) redact certain personally identifiable information for the Debtors’ individual creditors; (ii) approving the form and manner of service of the notice of commencement of these chapter 11 cases; and (iii) granting related relief. In support of this Motion, the Debtors rely upon and refer this Court to the *Declaration of Lawrence Perkins in Support of the Debtors’ Chapter 11 Petitions and First Day Relief* (the “First Day Declaration”),

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors’ corporate headquarters and the Debtors’ service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.



incorporated herein by reference.² In further support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution. The Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a), 107(b), 107(c), and 521 of title 11 of the United States Code (the “Bankruptcy Code”), Rules 1007, 2002, 9007, and 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rules 1001-1(c), 1007-2³, 2002-1, 9013-1(m), and 9018-1(d).

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the First Day Declaration.

³ Local Rule 1007-2(a) allows multiple debtors, in a case where a claims and noticing agent is required, to file a consolidated list of creditors. Del. Bankr. L.R. 1007-2(a). These chapter 11 cases involve multiple debtors, and a claims and noticing agent is required pursuant to Local Rule 2002-1(f) because more than 200 creditors or parties in interest will be listed on the creditor matrix. Accordingly, the Debtors intend to file a consolidated list of creditors as contemplated by Local Rule 1007-2(a).

GENERAL BACKGROUND

4. On the date hereof (the “Petition Date”), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these Chapter 11 Cases.

5. Avenger Flight Group, LLC (“AFG LLC”) and its affiliates (collectively, “Avenger” or the “Company”) is a global leader in the commercial aviation simulation and training business. Avenger provides a full suite of advanced flight simulator training solutions to their customers, which include blue-chip passenger airlines, regional airlines, charter operators, and training operators. As of the Petition Date, the Company owns, operates or services 50 full-flight simulators and 15 flight training devices across 11 training centers in 4 countries.

6. A detailed description of the Debtors’ business and facts precipitating the filing of the Debtors’ chapter 11 proceedings are set forth in the First Day Declaration.

RELIEF REQUESTED

7. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”): (a) authorizing the Debtors to: (i) file a consolidated list of the Debtors’ thirty largest unsecured creditors in lieu of filing lists for each Debtor, (ii) redact certain personally identifiable information for the Debtors’ individual creditors; (b) (ii) approving the form and manner of service of the notice of commencement of these chapter 11 cases; and (c) granting related relief.

BASIS FOR RELIEF

A. Authority to File a Consolidated Top Thirty General Unsecured Creditor List for Each Debtor is Allowed Under the Bankruptcy Code

8. Bankruptcy Rule 1007(d) provides that a debtor shall file “a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders.” Fed. R. Bank. P. 1007(d) (the “Top 20 List”). The Top 20 List is primarily used by the Office of the United States Trustee (the “U.S. Trustee”) to evaluate the types and amounts of unsecured claims against a debtor and identify potential candidates to serve on an official committee of unsecured creditors appointed in a debtor’s case pursuant to section 1102 of the Bankruptcy Code.

9. The Debtors request authority to file a single list of their 30 largest general unsecured creditors on a consolidated basis (the “Top 30 List”). Because the top creditors of the Debtors overlap, and certain Debtors may have fewer than thirty significant unsecured creditors, the Debtors submit that filing separate Top 30 Lists for each Debtor would be of limited utility.⁴ In addition, the exercise of compiling separate Top 30 Lists for each Debtor could consume an excessive amount of the company’s limited time and resources. Further, the Debtors believe that a single consolidated Top 30 List will aid the U.S. Trustee in its efforts to communicate with these creditors.

10. Courts in this district have granted relief similar to the relief requested herein. *See, e.g., In re American Signature, Inc.*, No. 25-12105 (JKS) (Bankr. D. Del. Dec. 31, 2025) (authorizing the filing of a consolidated top 30 general unsecured creditors list on a final

⁴ The Debtors submit that if any of the Chapter 11 Cases converts to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor will file an unconsolidated Top 30 List within fourteen days of any such conversion.

basis); *In re Claire's Holdings LLC*, No. 25-11454 (BLS) (Bankr. D. Del. Sept. 8, 2025) (same); *In re Am. Tire Distribs., Inc.*, No. 24-12391 (CTG) (Bankr. D. Del. Nov. 18, 2024) (same); *In re Wheel Pros, LLC*, No. 24-11939 (JTD) (Bankr. D. Del. Dec. 2, 2024) (same); *In re Accuride Corp.*, No. 24-12289 (JKS) (Bankr. D. Del. Nov. 1, 2024) (same); *In re SunPower Corp.*, No. 24-11649 (CTG) (Bankr. D. Del. Aug. 28, 2024) (same).⁵

11. Accordingly, the Debtors submit that filing a consolidated Top 30 List is necessary for the efficient and orderly administration of the Chapter 11 Cases, appropriate under the facts and circumstances, and in the best interests of the Debtors' estates.

B. Service of Notices to Creditors by the Claims and Noticing Agent is Warranted

12. Bankruptcy Rule 2002(a) provides, in relevant part, that “the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least twenty-one days’ notice by mail of . . . the meeting of creditors under § 341 or § 1104(b) of the Code.” Fed. R. Bankr. P. 2002(a)(1). Subsection (f) provides that notice of the order for relief shall be sent by mail to all creditors. *See* Fed. R. Bankr. P. 2002(f).

13. The Debtors request that Kurtzman Carson Consultants, LLC dba Verita Global, the proposed claims and noticing agent (“Verita” or the “Claims and Noticing Agent”), undertake all mailings and email service, as applicable, directed by the Court or the U.S. Trustee or as required in section 342(a) of the Bankruptcy Code and Bankruptcy Rules 2002(a) and (f), including serving the notice of commencement of these chapter 11 cases, substantially in the form attached as Exhibit 1 to the Proposed Order (the “Notice of Commencement”), on all parties listed on the Creditor Matrix to advise them of the meeting of creditors under section 341 of the Bankruptcy Code. Service of the Notice of Commencement on the Creditor Matrix will not only

⁵ Because of the voluminous nature of the orders cited herein, such orders are not attached to this Motion. Copies of these orders are available upon request of the Debtors’ proposed counsel.

avoid confusion among creditors but will also prevent the Debtors' estates from incurring unnecessary costs associated with serving multiple notices to the parties listed on the Debtors' voluminous Creditor Matrix. Accordingly, service of the Notice of Commencement is warranted.

14. The Debtors believe that using the Claims and Noticing Agent promptly to provide notices to all applicable parties will maximize efficiency in administering these chapter 11 cases and will ease administrative burdens that would otherwise fall upon the Court and the U.S. Trustee. Additionally, the Claims and Noticing Agent will assist the Debtors in preparing creditor lists and mailing initial notices. Therefore, it is more efficient to authorize the Claims and Noticing Agent to mail or email, as applicable, all notices. Accordingly, Verita should undertake such mailings and email service.

C. Cause Exists to Redact Certain Personally Identifiable Information for Individual Creditors

15. Section 107(c) of the Bankruptcy Code provides that the Court “for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual[:] . . . [a]ny means of identification . . . contained in a paper filed, or to be filed in a case under” the Bankruptcy Code. 11 U.S.C. § 107(c)(1)(A).

16. The Debtors respectfully submit that it is appropriate to authorize the Debtors to redact from any paper filed or to be filed with the Court in the Chapter 11 Cases the home addresses of individuals—including the Debtors' employees—and interest holders because such information could be used, among other things, to perpetrate identity theft or to locate survivors of domestic violence, harassment, or stalking. Redaction is necessary to protect information that would create “undue risk of identity theft or other unlawful injury to the individual or the individual's property.” 11 U.S.C. § 107(c)(1). The risk in relation to section 107(c)(1) of

the Bankruptcy Code is real and not merely speculative. In at least one chapter 11 case in Delaware, the abusive former partner of a debtor's employee used the publicly accessible creditor and employee information filed in the chapter 11 case to track the employee at her new address that had not been publicly available until then, forcing the employee to change addresses again.⁶ More recently, in a chapter 11 case in the Southern District of New York, at least 15 phishing scams have been uncovered.⁷ These incidents targeted individuals whose names were publicized in the creditor matrix, including one in which scammers modified a court order and sent it to individuals whose names were disclosed, two where scammers posed as associates of debtors' counsel using fake email accounts purportedly from the debtors' counsel and requested that individual creditors reply with their account and other personal information, and another where scammers posed as the debtors' claims agent and requested the same information from individual creditors.

17. Courts in this district have granted the relief requested herein in comparable chapter 11 cases. *See, e.g., In re American Signature, Inc.*, No. 25-12105 (JKS) (Bankr. D. Del. Dec. 31, 2025) (authorizing the debtors to redact the home and email addresses of individuals on the creditor matrix, schedules and statements, and any other document filed with the court); *In re Claire's Holdings LLC*, No. 25-11454 (BLS) (Bankr. D. Del. Sept. 8, 2025) (same); *In re Marelli Auto. Lighting USA LLC*, No. 25-11034 (CTG) (Bankr. D. Del. July 16, 2025) (same); *In re At Home Grp. Inc.*, No. 25-11120 (JKS) (Bankr. D. Del. July 11, 2025) (same); *In re JOANN Inc.*,

⁶ The incident, which took place during the first Charming Charlie chapter 11 proceedings in 2017, is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. July 11, 2019), Docket No. 4.

⁷ *See In re Celsius Network LLC*, No. 22-10964 (MG), Docket Nos. 1527, 1681, 1904, 1992, 2082, 2896, 3121, 3251, 3422, 3722, 3932, 4070, 4763, 7729, and 7886 (Bankr. S.D.N.Y.).

No. 25-10068 (CTG) (Bankr. D. Del. Feb. 10, 2025) (same); *In re Am. Tire Distribs., Inc.*, No. 24-12391 (CTG) (Bankr. D. Del. Nov. 18, 2024) (same).

18. In addition to granting the requested relief, courts in this district have also expounded on the importance of authorizing debtors to redact individual creditors' personally identifiable information, including home addresses in particular. *See, e.g.*, Hr'g Tr. at 21:13–21, *In re Dex Media, Inc.*, No. 16-11200 (KG) (Bankr. D. Del. May 18, 2016) (“THE COURT: . . . Well, I think, that in the present day, with the abuse of private information, that these addresses ought to be redacted, and so . . . I just think that individuals whose only position is to have been former employees, for example, ought not to have their home addresses listed publicly. I think that . . . creates a possibility of abuse . . .”).

19. In *Art Van Furniture*, in overruling the objection of the U.S. Trustee to the same redaction relief proposed here, Judge Sontchi noted that the proposed redaction is not a “burden of proof” issue so “much as a common sense issue.” Hr'g Tr. at 25:6–7, *In re Art Van Furniture, LLC*, No. 20-10553 (CSS) (Bankr. D. Del. Mar. 10, 2020).⁸ Judge Sontchi found that “at this point and given the risks associated with having any kind of private information out on the internet, [redaction] has really become routine [and] I think obvious relief.” *Id.* at 25:13–16.

20. Similarly, in *Clover Technologies*, Judge Owens overruled the U.S. Trustee's objection, noting that “[t]o me it is common sense. I don't need evidence that there is, at best, a risk of identity theft and worse a risk of personal injury from listing someone's name

⁸ Similarly, Judge Sontchi previously overruled the U.S. Trustee's objection to the redaction of individuals' information and found that “it's just plain common sense in 2019—soon-to-be 2020—to put as little information out as possible about people's personal lives to present [sic] scams . . . [Identity theft] is a real-life issue, and, of course, the issue of domestic violence is extremely important.” Hr'g Tr. at 48:20–22, 49:3–5, *In re Anna Holdings, Inc.*, No. 19-12551 (CSS) (Bankr. D. Del. Dec. 3, 2019). Notably, Judge Sontchi acknowledged that “the world is very different from [the 1980s] when you and I started practice with the problems of identity theft” and that his perspective had evolved in that he was not previously aware of “the dangers with this kind of information becoming public.” *Id.* at 45:25–46:2, 47:22–24. The Debtors reserve the right to supplement the record with respect to such risks insofar as they are not self-evident in this instance.

and address on the internet by way of the court's electronic case filing system and, of course, the claims agent's website. . . . The court can completely avoid contributing to the risk by redacting the addresses. And while there is, of course, an important right of access we routinely redact sensitive and confidential information for corporate entities and redact individual's home addresses." Hr'g Tr. at 24:21–25, 25:9–13, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO) (Bankr. D. Del. Jan. 22, 2020). In *Forever 21*, in overruling the U.S. Trustee's objection, Judge Gross found that "[w]e live in a new age in which the theft of personal identification is a real risk, as is injury to persons who, for personal reasons, seek to have their addresses withheld." Hr'g Tr. at 60:22–25, *In re Forever 21, Inc.*, No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019).

21. For these reasons, the Debtors respectfully submit that cause exists to authorize the Debtors to redact, pursuant to section 107(c)(1) of the Bankruptcy Code and in compliance with applicable privacy or data protection laws and regulations, the home and email addresses of natural persons listed on the Creditor Matrix, the Schedules and Statements, any related affidavits of service, or any other document filed with the Court. Absent such relief, the Debtors (a) may be in violation of applicable privacy or data protection laws and regulations, thereby exposing the Debtors to severe monetary penalties that could threaten their operations during this sensitive stage of their restructuring, (b) would unnecessarily render individuals more susceptible to identity theft and phishing scams, and (c) could jeopardize the safety of current and former employees, debtholders, and other individual creditors, or individual equity holders, who, unbeknownst to the Debtors, are survivors of domestic violence, harassment, or stalking, by publishing their home addresses without any advance notice or opportunity to opt out or take protective measures.

22. The Debtors propose to provide unredacted copies of the Creditor Matrix, the Schedules and Statements, and any other filings redacted pursuant to the proposed Order to: (a) the Court, the U.S. Trustee, counsel to any official committee appointed in these chapter 11 cases, and the Claims and Noticing Agent; and (b) any party in interest upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these chapter 11 cases; *provided* that any receiving parties shall not transfer or otherwise provide such unredacted document to any person or entity that is not a party to the request. In each case, this would be subject to a review of whether such disclosure, on a case-by-case basis, would violate any obligation under any privacy or data protection law or regulation. Nothing requested herein is intended to preclude a party in interest's right to file a motion requesting that the Court unseal the information redacted by the Order. In addition, the Debtors will distribute, as applicable, any notices that are received at the Debtors' corporate headquarters and are intended for a current employee.

COMPLIANCE WITH LOCAL RULE 9018-1(d)(iv)

23. Under the circumstances, and given the nature of the relief requested herein, the Debtors have not been able to confer with the individuals whose information is requested to be sealed and, accordingly, the Debtors submit that there is cause to excuse the Debtors from the meet and confer obligations under Local Rule 9018-1(d).

NOTICE

24. The Debtors will provide notice of this Motion to: (a) the Office of the U.S. Trustee for the District of Delaware, 844 King Street, Suite 2207, Lock Box 35, Wilmington, Delaware, 19801, Attn: Jon Lipshie, Esq. (jon.lipshie@usdoj.gov); (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) counsel to the Debtors' secured

creditors; (d) the United States Attorney's Office for the District of Delaware; (e) the state attorneys general for all states in which the Debtors conduct business; (f) the Securities Exchange Commission; and (g) any party that requests service pursuant to Bankruptcy Rule 2002. As this Motion is seeking "first day" relief, within two business days of the hearing on the Motion, the Debtors will serve copies of the Motion and any order entered in respect to this Motion as required by Local Rule 9013-1(m).

NO PRIOR REQUEST

25. No prior request for the relief sought in this Motion has been made to this or any other Court.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**: (a) authorizing the Debtors to: (i) file a consolidated list of the Debtors' thirty largest unsecured creditors in lieu of filing lists for each Debtor, and (ii) redact certain personally identifiable information for the Debtors' individual creditors; (b) approving the form and manner of service of the notice of commencement of these chapter 11 cases; and (c) granting related relief.

Dated: February 11, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

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Proposed Counsel to the Debtors and Debtors-in-Possession

EXHIBIT A
(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: AVENGER FLIGHT GROUP, LLC, <i>et al.</i> , Debtors. ¹	Chapter 11 Case No. 26-10183 () (Joint Administration Requested) Related Docket No. []
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ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF THE DEBTORS' THIRTY LARGEST UNSECURED CREDITORS, AND (B) REDACT CERTAIN PERSONALLY IDENTIFIABLE INFORMATION FOR INDIVIDUAL CREDITORS; (II) APPROVING THE NOTICE OF COMMENCEMENT AND SERVICE THEREOF; AND (III) GRANTING RELATED RELIEF

Upon consideration of the motion (the "Motion")² of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), for the entry of an order (this "Order"): (i) authorizing the Debtors to file (a) a consolidated list of their top 30 unsecured creditors, (b) authorizing the Debtors to redact certain personal identification information; (b) approving the form and manner of service of the notice of commencement of these chapter 11 cases; and (c) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court having found that this is a core

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors' corporate headquarters and the Debtors' service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Debtors are authorized to submit a consolidated list of their top thirty (30) largest general unsecured creditors in these Chapter 11 Cases in lieu of each Debtor filing a list of its thirty (30) largest unsecured creditors.
3. In the event that any of the Chapter 11 Cases converts to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor will file an unconsolidated Top 30 List within fourteen days of any such conversion.
4. The Debtors shall provide information regarding their largest creditors on an entity-by-entity basis to the U.S. Trustee upon request.
5. The Debtors are authorized, pursuant to section 107(c)(1) of the Bankruptcy Code, to redact on the Creditor Matrix, the Schedules and Statements, affidavits of service, and any other documents filed with the Court, the home and email addresses of natural persons, including individual creditors and individual equity holders. The Debtors shall provide an

unredacted version of the Creditor Matrix, the Schedules and Statements, and any other filings redacted pursuant to this Order to: (a) the Court, the U.S. Trustee, counsel to any official committee appointed in these chapter 11 cases, and the Claims and Noticing Agent; and (b) any party in interest upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these chapter 11 cases; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request. In each case, this would be subject to a review of whether such disclosure, on a case-by-case basis, would violate any obligation under any privacy or data protection law or regulation. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order.

6. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information redacted by this Order.

7. The Debtors shall file a redacted version of the Creditor Matrix, Schedules and Statements, or other documents filed with the Court, and the Debtors shall cause the same to be posted on the Claims and Noticing Agent's website.

8. The Debtors shall file an unredacted Creditor Matrix under seal with the Court.

9. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service without revealing the sealed or redacted information.

10. To the extent a party in interest files a document on the docket in these Chapter 11 Cases that is required to be served on creditors whose information is under seal pursuant to this Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of the Debtors' notice and claims agent, to effectuate the service on such party's behalf.

11. All pleadings required to be served on employees will be served at their residential addresses.

12. The Notice of Commencement, substantially in the form attached hereto as **Exhibit 1**, is approved. Service of the Notice of Commencement shall be deemed adequate and sufficient notice of (a) the commencement of these chapter 11 cases, and (b) the scheduling of the meeting of creditors under section 341 of the Bankruptcy Code.

13. The Debtors, through their Claims and Noticing Agent, are authorized to serve all pleadings and papers, including the Notice of Commencement, on all parties listed on the Creditor Matrix.

14. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Local Rules are satisfied by such notice.

15. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon entry.

16. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

17. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Exhibit 1

Notice of Commencement Form 309F1

Information to identify the case:		
Debtor <u>Avenger Flight Group, LLC, et al.</u> <small>Name</small>	EIN <u>46-1371216</u>	
United States Bankruptcy Court for the District of Delaware	Date case filed for Chapter 11	<u>February 11, 2026</u>
Case Number: <u>26-10183 ()</u>		

Official Form 309F1 (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor’s property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney’s fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk’s office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk’s office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>), or by visiting the court-appointed claims agent’s website at: www.veritaglobal.net/AvengerFG.

The staff of the bankruptcy clerk’s office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor’s full name	See chart below
2. All other names used in the last 8 years	See chart below

DEBTOR	ADDRESS	ALL OTHER NAMES IN LAST 8 YEARS	EIN	CASE NO.
Avenger Flight Group, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	46-1371216	26-10183
AFG Dallas III, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	85-1245615	26-10184
AFG Dallas IV, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	87-1435558	26-10185
AFG Dallas, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	81-2473418	26-10186
AFG EU Operations Corp.	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	93-2799406	26-10187
AFG FLL, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	92-1346470	26-10188
AFG Latam Holding Corp.	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	83-0606475	26-10189
AFG Latam Sim Holdings II, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	83-3470473	26-10190
AFG Latam Sim Holdings III, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	83-4262592	26-10191
AFG Latam Sim Holdings IV, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	83-4500093	26-10192
AFG Latam Sim Holdings, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	83-0606475	26-10193
AFG Latam, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	82-4819545	26-10194
AFG Mexico Corp.	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	84-2731402	26-10195
AFG Orlando, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	87-1558409	26-10196
AFG Sanford, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	87-3226661	26-10197
AFG Sim Holding Corp.	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	84-2483325	26-10198
Avenger Flight Group Europe, Corp.	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	83-4375908	26-10199
Avenger Flight Group Topco, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	99-4135643	26-10182
Avenger Flight Training, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	47-1735640	26-10200
Avenger Flight Group Mexico II, S. DE R.L. DE C.V.	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	N/A	26-10201
Papi Flight Training, LLC	1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315	None	46-3866206	26-10202

3. Address 1450 Lee Wagener Blvd., Ft. Lauderdale, FL 33315

4. Debtor's attorneys

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