

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

In re:  AVENGER FLIGHT GROUP, LLC, <i>et al.</i> ,  Debtors. <sup>1</sup>	Chapter 11  Case No. 26-10183 (MFW)  (Joint Administration Requested)  Ref. Docket Nos. 3, 4, 5, 6, 7, 8, 9, 10, 11 & 12
---	--

**Hearing Date: February 13, 2026 at 2:00 P.M. (ET)**

**NOTICE OF HEARING<sup>2</sup> ON FIRST DAY MOTIONS**

**This hearing will be conducted by Zoom. Parties and witnesses are permitted, but not required, to appear in person. The Court has no preference.**

**To attend the hearing remotely, please register using the ecourt appearances tool on the court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov) or click the below link:  
<https://ecf.deb.uscourts.gov/cgi-bin/nysbappearances.pl>.**

**Parties are required to register for the hearing no later than 9:00 a.m. on February 13, 2026. You must use your full name when logging into zoom or you will not be allowed into the meeting.**

**After registering your appearance, you will receive a confirmation email. Zoom information will be sent out prior to the hearing.**

<sup>1</sup> 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.

<sup>2</sup> Any party who wishes to attend the video conference is required to register at the following link: <https://www.deb.uscourts.gov/ecourt-appearances>.



**PLEASE TAKE NOTICE** that on February 11, 2026 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors are continuing to operate their businesses and manage their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that together with their chapter 11 petitions, the Debtors also filed the following applications and motions set forth below (collectively, the “First Day Motions”). A hearing to consider the First Day Motions (the “First Day Hearing”) will be held on **February 13, 2026, at 2:00 P.M. (Eastern Time)**, before the Honorable Mary F. Walrath at the United States Bankruptcy Court for the District of Delaware (the “Court”), located at 824 North Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801.

**First Day Administrative and Procedural Motions**

1. Debtors’ Motion for Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only [Filed 12/12/26, [Docket No. 3](#)]
2. Debtors’ Application for Authorization to Employ and Retain Kurtzman Carson Consultants, LLC dba Verita Global as Claims and Noticing Agent Effective as of the Petition Date [Filed 12/12/26, [Docket No. 4](#)]
3. 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 [Filed 12/12/26, [Docket No. 5](#)]

**First Day Motions Pertaining to Business Operations**

4. Motion for Entry of Interim and Final Orders: (I) Approving Proposed form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving

Objections By Utility Companies; (III) Prohibiting Utility Companies From Altering, Refusing, Or Discontinuing Service; and (IV) Granting Related Relief [Filed 12/12/26, [Docket No. 6](#)]

5. Motion for Entry of Interim and Final Orders: (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief [Filed 12/12/26, [Docket No. 7](#)]
6. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies and Programs, (B) Honor all Insurance Obligations, (C) Renew, Amend, Supplement, Extend, or Purchase and Finance Insurance Policies; (II) Authorizing Continuation of Insurance Premium Financing Agreement; and (III) Granting Related Relief [Filed 12/12/26, [Docket No. 8](#)]
7. Motion for Entry of Interim and Final Orders: (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed 12/12/26, [Docket No. 9](#)]
8. Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Granting Related Relief [Filed 12/12/26, [Docket No. 10](#)]
9. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing All Financial Institutions to Honor All Related Payment Requests; and (IV) Granting Related Relief [Filed 12/12/26, [Docket No. 11](#)]

#### **First Day Motion Pertaining to Financing**

10. Motion of the Debtors for Entry of Interim and Final Orders Under Bankruptcy Code Sections 105, 361, 362, 363, 364, 503, 506, 507, and 552 and Bankruptcy Rules 2002, 4001, 6003, 6004, and 9014 (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral on a Limited Basis, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Filed 12/12/26, [Docket No. 12](#)]

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions can be obtained for a fee through the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov), referencing Case No. 26-10183 (MFW), or may be obtained for free by accessing the Debtors' restructuring website at [www.veritaglobal.net/AvengerFG](http://www.veritaglobal.net/AvengerFG).

**PLEASE TAKE FURTHER NOTICE** that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: February 12, 2026

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Mary F. Caloway*

---

Richard M. Pachulski, Esq. (*pro hac vice* forthcoming)

Mary F. Caloway, Esq. (DE Bar No. 3059)

919 North Market Street, 17th Floor

Wilmington, DE 19801

Telephone: (302) 652-4100

Facsimile: (302) 652 4400

Email: rpachulski@pszjlaw.com

mcaloway@pszjlaw.com

- and -

Gregory V. Demo, Esq. (*pro hac vice* forthcoming)

Cia H. Mackle, Esq. (*pro hac vice* forthcoming)

1700 Broadway, 36th Floor

New York, NY 10019

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

Email: gdemo@pszjlaw.com

cmackle@pszjlaw.com

*Proposed Counsel to the Debtors and Debtors in Possession*