

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

In re:	Chapter 11
AVENGER FLIGHT GROUP, LLC, <i>et al.</i> ,	Case No. 26-10183 (MFW)
Debtors. ¹	(Joint Administration Requested)
	Ref. Docket No. 16

Objection Deadline: February 27, 2026 at 4:00 p.m. (ET)
Hearing Date: March 6, 2026 at 11:30 a.m. (ET)

**NOTICE OF HEARING ON DEBTORS’ FIRST OMNIBUS MOTION FOR THE
ENTRY OF AN ORDER (A) AUTHORIZING REJECTION
OF UNEXPIRED LEASES OF NON-RESIDENTIAL REAL PROPERTY
AND EXECUTORY CONTRACTS *NUNC PRO TUNC* TO THE PETITION DATE;
(B) ABANDONING ANY REMAINING PERSONAL PROPERTY LOCATED AT THE
LEASED PREMISES; AND (C) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on February 12, 2026, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ First Omnibus Motion for the Entry of an Order (A) Authorizing Rejection of Unexpired Leases of Non-Residential Real Property and Executory Contracts Nunc Pro Tunc to the Petition Date; (B) Abandoning Any Remaining Personal Property Located at the Leased Premises; and (C) Granting Related Relief* [Docket No. 16] (the “Motion”).

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.



PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be filed with the Bankruptcy Court on or before **February 27, 2026, at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response or objection upon: (i) proposed counsel to the Debtors, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801), Attn: Richard M. Pachulski (rpachulski@pszjlaw.com) and Mary F. Caloway (mcaloway@pszjlaw.com); (ii) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Attn: Jon Lipshie, Esq. (jon.lipshie@usdoj.gov); (iii) counsel to the DIP Lenders, (a) Proskauer Rose LLP, Eleven Times Square, New York, New York 10036 (Attn: David M. Hillman (dhillman@proskauer.com) and Matthew R. Koch (mkoch@proskauer.com)), and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801 (Attn: Matthew B. McGuire (mcguire@lrclaw.com)); (iv) counsel to the DIP Agent, (a) Alston & Bird LLP, 90 Park Avenue, New York, New York 10016 (Attn: William Hao (william.hao@alston.com) and Dylan S. Cassidy (dylan.cassidy@alston.com)); and (v) counsel for any official committee of unsecured creditors appointed in the Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON MARCH 6, 2026, AT 11:30 A.M. PREVAILING EASTERN TIME BEFORE THE HONORABLE MARY F.

WALRATH, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET,
5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.

Dated: February 12, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

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

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*Proposed Counsel to the Debtors and Debtors in
Possession*