

**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)  (Jointly Administered)  <b>Re: Docket No. 16</b>
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**CERTIFICATION OF NO OBJECTION REGARDING 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**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been received to 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* (the "Motion") [Docket No. 16] filed on February 12, 2026. The undersigned further certifies that the Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion

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<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.



appears thereon. Objections to the Motion were to be filed and served no later than February 27, 2026 at 4:00 p.m. prevailing Eastern Time.

Accordingly, it is hereby respectfully requested that the proposed order filed with the Motion and attached hereto as **Exhibit A** be entered at the Court's convenience.

Dated: March 5, 2026

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Mary F. Caloway*

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**Exhibit A**

**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)  (Jointly Administered)  <b>Re: Docket No. 16</b>
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**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**

Upon consideration of the motion (the “Motion”)<sup>2</sup> of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), for the entry of an order (this “Order”): (a) authorizing the Debtors to (i) reject the Contracts listed on **Schedule 1** annexed hereto, *nunc pro tunc* to the Petition Date; and (ii) reject the Leases listed on **Schedule 2** annexed hereto, *nunc pro tunc* to the Petition Date; (b) authorizing the Debtors to abandon any remaining personal property located at the Leased Premises; and (c) granting related relief; all as more fully set forth in the Motion; 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

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<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> A capitalized term used but not defined herein has 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. Pursuant to section 365 of the Bankruptcy Code, the Contracts and the Leases shall each be deemed rejected as of the Petition Date.
3. The Debtors are authorized to abandon any remaining personal property located at the Leased Premises pursuant to section 554(a) of the Bankruptcy Code.
4. Within three (3) calendar days after entry of this Order, the Debtors will serve this Order on the counterparty to each Contract and Lease.
5. With respect to the Leases listed on Schedule 2 hereto, any personal property remaining at the leased premises as of the Rejection Effective Date shall be deemed abandoned and the landlord shall be free to dispose of such abandoned property in its sole and absolute discretion without notice or liability to the Debtors or any third parties.
6. Counterparties to Contracts and Leases that are rejected pursuant to this Order must file a proof of claim relating to the rejection of such Contracts or Leases, if any, by the later of

(a) any applicable claims bar date established in these Chapter 11 Cases, and (b) 30 days after entry of this Order. The Debtors reserve all rights to contest any such claim and to contest the characterization of each Contract or Lease, as executory or not, and to contest whether such Contract or Lease may have terminated prior to the Petition Date or otherwise, or may not have been effective prior to the Petition Date or otherwise.

7. The Debtors reserve their rights to assume, assume and assign, or reject other executory contracts or unexpired leases, and nothing herein shall be deemed to affect such rights.

8. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any claim against a Debtor entity; (b) a waiver of the Debtors' right to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order or the Motion; (e) a request or authorization to assume any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law.

9. Nothing contained in the Motion or this Order is intended or should be construed to create an administrative priority claim.

10. This Order shall be immediately effective and enforceable upon its entry.

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

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

**SCHEDULE 1****Rejected Contracts**

<b>Counterparty</b>	<b>Counterparty Address</b>	<b>Debtor Entity</b>	<b>Contract Description</b>
Multi Pilot Simulations International b.v.	Koningin Wilhelminaweg 449, 3737 BE Groenekan, The Netherlands	Avenger Flight Group, LLC	Maintenance and Service Agreement (A2)
Multi Pilot Simulations International b.v.	Koningin Wilhelminaweg 449, 3737 BE Groenekan, The Netherlands	Avenger Flight Group, LLC	Maintenance and Service Agreement (B1)
Multi Pilot Simulations International b.v.	Koningin Wilhelminaweg 449, 3737 BE Groenekan, The Netherlands	Avenger Flight Group, LLC	Maintenance and Service Agreement (B2)
Multi Pilot Simulations International b.v.	Koningin Wilhelminaweg 449, 3737 BE Groenekan, The Netherlands	Avenger Flight Group, LLC	Comfort Letter
SLR Equipment Finance	40 Danbury Road, 1 <sup>st</sup> Floor Wilton, CT 06897	AFG Dallas III, LLC	Equipment Schedule AFG-0009  Amendment to Equipment Schedule AFG-0009
NEFPASS, LLC	40 Danbury Road, 1 <sup>st</sup> Floor Wilton, CT 06897	AFG Dallas III, LLC	Equipment Schedule AFG-0009  Amendment to Equipment Schedule AFG-0009

**SCHEDULE 2****Rejected Leases**

<b>Counterparty</b>	<b>Counterparty Address</b>	<b>Debtor Entity</b>	<b>Leased Premises</b>
Liberty AIPO Limited Partnership/ Prologis	300 S. Orange Avenue Suite 1110 Orlando, FL 32801 Attn.: Market Officer  <i>With copy to:</i> Prologis 1800 Wazee Street Suite 500 Denver, CO 80202 Attn.: General Counsel	Avenger Flight Group, LLC	Prologis Park at AIPO 2012 10620 Boggy Creek Road Orlando, FL 32827
SADR Logistic Services Company	Al Riyadh Anas Bin Malek St Alyasmeen District P.O. Box 3164 52354	Avenger Flight Group, LLC	RRNB6934, building no. 6934, Al Qairawan District, Riyadh situated at Riyadh, Tharwat Logistics Park