

**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 (MFW) (Jointly Administered)
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NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and sections 102(1), 342 and 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.*, Blank Rome LLP and Winstead PC hereby appear as counsel to Envoy Air, Inc. (“Envoy”) in the above-captioned bankruptcy case. Envoy hereby requests that all notices given or required to be given in these cases and all papers served or required to be served in these cases, be given to and served upon the following:

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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 the foregoing request includes the notices and papers referred to in Bankruptcy Rule 2002, and also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, or otherwise, which affect or seeks to affect in any way the above-captioned Debtors or the property of the Debtors, or any of the rights or interests held or asserted by Envoy with respect to the Debtors or property of the Debtors.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of Envoy, including without limitation, to: (a) challenge the jurisdiction of this Court to adjudicate any matter, including, without limitation, any non-core matter; (b) require that where any adversary proceeding is to be initiated against Envoy in these cases, or any related case or where any proceeding is to be initiated by complaint against Envoy under applicable non-bankruptcy law, service shall be made on Envoy in accordance with applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon undersigned counsel is insufficient for such purposes; (c) have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware; (d) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (e) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (f) any other rights, claims, actions, defenses, setoffs or recoupments to which Envoy is or may be entitled in law or at equity, all of which rights, claims, actions, defenses, setoffs or recoupments Envoy expressly reserve and assert.

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Dated: March 9, 2026
Wilmington, Delaware

BLANK ROME LLP

/s/ Jordan L. Williams

John E. Lucian (*pro hac vice* forthcoming)

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Counsel to Envoy Air, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2026 I served or caused to be served the foregoing *Notice of Appearance and Request for Service of Papers* by CM/ECF upon those parties registered to receive such electronic notifications in these cases.

/s/ Jordan L. Williams

Jordan L. Williams (DE No. 7128)