

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:  
  
AVENGER FLIGHT GROUP, LLC, *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11  
  
Case No. 26-10183 (MFW)  
  
(Jointly Administered)

**CERTIFICATE OF SERVICE**

I, Nuno Cardoso, depose and say that I am employed by Kurtzman Carson Consultants LLC dba Verita Global (“Verita”), the claims and noticing agent for the Debtors in the above-captioned case.

On March 10, 2026, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

- **Debtors’ Motion for Entry of an Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9) of the Bankruptcy Code; (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units; (III) Setting a Bar Date for the Filing of Requests for Allowance of Administrative Expense Claims; (IV) Establishing an Amended Schedules Bar Date and a Rejection Damages Bar Date; (V) Approving the Form of and Manner for Filing Proofs of Claim; (VI) Approving a Notice of Bar Dates; and (VII) Granting Related Relief [Docket No. 152]**

*[Remainder of page intentionally left blank]*

<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.



- **Notice of Filing of Proposed Final Order Granting 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 [Docket No. 153]**
- **Amended Notice of Agenda of Matters Scheduled for Hearing on March 11, 2026 at 11:30 a.m. (Eastern Time) [Docket No. 154]**

Furthermore, on March 10, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit C**; and via First Class Mail upon the service lists attached hereto as **Exhibit D** and **Exhibit E**:

- **Notice of Filing of Proposed Final Order Granting 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 [Docket No. 153]**

Dated: March 12, 2026

/s/ Nuno Cardoso

Nuno Cardoso

Verita

222 N. Pacific Coast Highway, Suite 300

El Segundo, CA 90245

Tel 310.823.9000

# **Exhibit A**

Core/2002 Service List  
Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
Top 30 Creditor / Committee of Unsecured Creditors	Allegiant Air, LLC	Laura Overton	laura.overton@allegiantair.com
Counsel to the DIP Lenders, the DIP Agent, Wilmington Trust, Prepetition Secured Lenders and National Association, as Prepetition Term Loan Agent and DIP Agent	Alston & Bird LLP	William Hao and Dylan S. Cassidy	William.Hao@alston.com; Dylan.Cassidy@alston.com
Counsel to Omega Air, Inc.	Bielli & Klauder, LLC	David M. Klauder	dklauder@bk-legal.com
Counsel to Envoy Air, Inc.	Blank Rome LLP	John E. Lucian and Jordan L. Williams	John.Lucian@blankrome.com; Jordan.Williams@blankrome.com
Top 30 Creditor / Committee of Unsecured Creditors	Bow Systems (Private) Limited	Shehzad Ahmed Mir	shehzad@bowsystems.com
Delaware Attorney General	Delaware Attorney General	Attn Bankruptcy Department	attorney.general@state.de.us
Delaware State AG and DOJ	Delaware Dept of Justice	Attorney General	attorney.general@state.de.us; attorney.general@delaware.gov
DE Secretary of State	Delaware Secretary of State	Division of Corporations	dosdoc_bankruptcy@state.de.us
DE State Treasury	Delaware State Treasury		statetreasurer@state.de.us
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	citizenservices@myfloridalegal.com; oag.civil.eserve@myfloridalegal.com
Counsel to SIM International B.V.	Freshfields US LLP	Mark F. Liscio, Alexander Rich and Ali Muffenbier	mark.liscio@freshfields.com; alexander.rich@freshfields.com; ali.muffenbier@freshfields.com
IRS	Internal Revenue Service	Attn Susanne Larson	SBSE.Insolvency.Balt@irs.gov
Counsel to the DIP Lenders, the DIP Agent, Wilmington Trust, Prepetition Secured Lenders and Ad Hoc Group of 1L Lenders	Landis Rath & Cobb LLP	Adam G. Landis, Matthew B. McGuire and Joshua B. Brooks	landis@lrclaw.com; mcguire@lrclaw.com; brooks@lrclaw.com
Counsel to Omega Air, Inc.	Langley & Banack, Inc.	David S. Gragg	dgragg@langleybanack.com
Counsel to Dallas County, Tarrant County and Irving ISD	Linebarger Goggan Blair & Sampson, LLP	John Kendrick Turner	dallas.bankruptcy@lgbs.com
Minnesota Attorney General	Minnesota Attorney General	Attn Bankruptcy Department	ag.replies@ag.state.mn.us
Top 30 Creditor / Committee of Unsecured Creditors	Multi Pilot Simulations	Philip Adrian	philip.adrian@mps.aero
Nevada Attorney General	Nevada Attorney General	Attn Bankruptcy Department	nvagbk@ag.nv.gov
US Trustee for District of DE	Office of the United States Trustee Delaware	Jonathan Lipshie	jon.lipshie@usdoj.gov
Counsel to Wilmington Trust, National Association, as Prepetition Term Loan Agent and DIP Agent	Pashman Stein Walder Hayden, P.C.	John W. Weiss and Richard W. Riley	jweiss@pashmanstein.com; rriley@pashmanstein.com
Counsel to SIM International B.V.	Potter Anderson & Corroon LLP	Jeremy W. Ryan, James R. Risener III and Ethan H. Sulik	jryan@potteranderson.com; jrisener@potteranderson.com; esulik@potteranderson.com
Counsel to the DIP Lenders, the DIP Agent, Wilmington Trust, Prepetition Secured Lenders and Ad Hoc Group of 1L Lenders	Proskauer Rose LLP	David M. Hillman, Matthew R. Koch and Dylan J. Marker	MKoch@proskauer.com; DHillman@proskauer.com; DMarker@proskauer.com; Prosk_AFG@proskauer.com
Counsel to Oxford I Asset Management USA Inc.	Robinson & Cole LLP	Jamie L. Edmonson	jedmonson@rc.com
SEC Regional Office	Securities & Exchange Commission	NY Regional Office	bankruptcynticeschr@sec.gov;
SEC Regional Office	Securities & Exchange Commission	PA Regional Office	nyrobankruptcy@sec.gov philadelphia@sec.gov
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	SECBankruptcy-OGC-ADO@SEC.GOV; secbankruptcy@sec.gov
Interested Party Simulator Equipment Financing, LLC	Simulator Equipment Financing, LLC	Richard Johnson, Managing Member	rick@simulatorfinancing.com
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	bankruptcytax@oag.texas.gov; communications@oag.texas.gov
US Attorney for District of Delaware	US Attorney for District of Delaware	US Attorney for Delaware	usade.ecfbankruptcy@usdoj.gov
Counsel to Prepetition Secured Lender EDC	Vedder Price	David L Kane	dkane@vedderprice.com
Proposed Counsel to the Official Committee of Unsecured Creditors of Avenger Flight Group, LLC, et al.	Willkie Farr & Gallagher LLP	Brett H. Miller, Todd M. Goren, James H. Burbage and Joseph R. Brandt	bmiller@willkie.com; tgoren@willkie.com; jburbage@willkie.com; jbrandt@willkie.com
Counsel to Envoy Air, Inc.	Winstead PC	Annmarie Chiarello	achiarello@winstead.com
Proposed Counsel to the Official Committee of Unsecured Creditors of Avenger Flight Group, LLC, et al.	Womble Bond Dickinson (US) LLP	Matthew P. Ward and Todd A. Atkinson	matthew.ward@wbd-us.com; todd.atkinson@wbd-us.com

## **Exhibit B**

## Exhibit B

Core/2002 Service List  
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Delaware Attorney General	Delaware Attorney General	Attn Bankruptcy Department	Carvel State Office Bldg.	820 N. French St.		Wilmington	DE	19801
Delaware State AG and DOJ	Delaware Dept of Justice	Attorney General	Attn Bankruptcy Department	Carvel State Building	820 N French St	Wilmington	DE	19801
DE Secretary of State	Delaware Secretary of State	Division of Corporations	Franchise Tax	PO Box 898		Dover	DE	19903
DE State Treasury	Delaware State Treasury		820 Silver Lake Blvd, Suite 100			Dover	DE	19904
Florida Attorney General	Florida Attorney General	Attn Bankruptcy Department	PL-01 The Capitol			Tallahassee	FL	32399-1050
IRS	Internal Revenue Service	Attn Susanne Larson	31 Hopkins Plz Rm 1150			Baltimore	MD	21201
IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346
Minnesota Attorney General	Minnesota Attorney General	Attn Bankruptcy Department	445 Minnesota St Suite 1400			St Paul	MN	55101-2131
Nevada Attorney General	Nevada Attorney General	Attn Bankruptcy Department	Old Supreme Ct. Bldg.	100 N. Carson St		Carson City	NV	89701
US Trustee for District of DE	Office of the United States Trustee Delaware	Jonathan Lipshie	J. Caleb Boggs Federal Building	844 King Street, Suite 2207	Lockbox 35	Wilmington	DE	19801
SEC Regional Office	Securities & Exchange Commission	NY Regional Office	Regional Director	100 Pearl St, Suite 20-100		New York	NY	10004-2616
SEC Regional Office	Securities & Exchange Commission	PA Regional Office	Regional Director	One Penn Center	1617 JFK Boulevard, Ste 520	Philadelphia	PA	19103
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	100 F St NE			Washington	DC	20549
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	300 W. 15th St			Austin	TX	78701
US Attorney for District of Delaware	US Attorney for District of Delaware	US Attorney for Delaware	1313 N Market Street	Hercules Building		Wilmington	DE	19801

# **Exhibit C**

**Banks Service List**  
**Served via Electronic Mail**

<b>CreditorName</b>	<b>CreditorNoticeName</b>	<b>Email</b>
CitiBank	Roy Mauder	roy.t.mauder@citi.com
City National Bank	Hugo Carreno, Jr.	hugo.carreno@citynational.com
Oxford Commercial Finance	Matthew Bacich	mbacich@oxfordbank.bank
Santander Bank		gchamber@santander.us

## **Exhibit D**

**Banks Service List**  
**Served via First Class Mail**

<b>CreditorName</b>	<b>Address1</b>	<b>Address2</b>	<b>Address2</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	<b>Country</b>
Bank of America, N.A.	Bank of America Corporate Center	100 North Tryon Street		Charlotte	NC	28255	
CitiBank	Roy Mauder	201 S Biscayne Blvd, Suite 2950		Miami	FL	33131	
City National Bank	Hugo Carreno, Jr.	8790 NW 25th St.		Miami	FL	33172	
mBank S.A		Ul. Prosta 18	Warsaw	Masovian		00-850	Poland
Oxford Commercial Finance	Matthew Bacich	4530 E. Shea Blvd, Suite 170		Phoenix	AZ	85028	
Santander Bank		75 State Street		Boston	MA	02109	

# **Exhibit E**

**Exhibit E****Lienholders Service List  
Served via First Class Mail**

<b>CreditorName</b>	<b>CreditorNoticeName</b>	<b>Address1</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	<b>Country</b>
AFG Latam Sim Holdings IV, LLC	Attn Elsa Gagnon	1450 Lee Wagener Boulevard	Fort Lauderdale	FL	33315	
Allegiant Air, LLC		1201 N. Town Center Drive	Las Vegas	NV	89144	
Export Development Canada, as Security Trustee	Attn Loan Services & Credit Risk Management-Transportation	150 Slater Street	Ottawa	ON	K1A 1K3	Canada
FCS Advisors LLC		441 Ninth Avenue, Floor 20	New York	NY	10001	
Nations Fund I, LLC		40 Danbury Road	Wilton	CT	06897	
Nefpass LLC		40 Danbury Road	Wilton	CT	06897	
Oxford Commercial Finance		2601 Cambridge Court, Suite 400	Auburn Hills	MI	48326	
Sim-International Lease B.V.	Attn Corporate Secretary	Wattstraat 7A	Sassenheim	NL	2171 TP	Netherland
Wilmington Trust, National Association, as Collateral Agent		50 South Sixth St., Suite 1290	Minneapolis	MN	55402	