

**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)

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**NOTICE OF EMPLOYMENT OF FRONT OFFICE SUPPORT STAFF**

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**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the “Debtors”) have employed front office support staff in accordance with the terms set forth on Exhibit A.

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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.



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Dated: March 24, 2026

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Mary F. Caloway*

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*Counsel to the Debtors and Debtors in Possession*

The Debtors have hired certain personnel of SierraConstellation Partners LLC (“SCP”) as consultants in the ordinary course of business and will compensate them in the ordinary course of business, including payment of hourly rates and reimbursement of actual, necessary documented expenses.

**Scope of Work**

Support and assist the Debtors’ accounting and financial reporting processes and systems.

**Exclusions**

All SCP personnel shall have resigned any role as an officer of the Debtors effective immediately, and no SCP current or future personnel shall serve as an officer or manager of any of the Debtors hereafter. No SCP personnel shall have oversight or decision-making authority with respect to the Debtors’ chapter 11 cases.

**Personnel/Rates**

The SCP personnel expected to fulfill the foregoing Scope of Work are:

<u>Personnel</u>	<u>Hourly Rate</u>
Ben Smith	\$615
Abbas Perez	\$370

If the Debtors request that SCP provide additional support personnel, the Debtors shall file an amendment to this Notice identifying such personnel and their applicable standard hourly rates (which range from \$260 for analysts to \$1,300 for partners). The Office of the United States Trustee shall have fourteen (14) days from the filing of such amendment to object to the Debtors’ employment of and compensation to SCP with respect to such additional personnel.