

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: Chapter 11
AVENGER FLIGHT GROUP, LLC, *et al.*, Case No. 26-10183 (MFW)
Debtors.¹ (Jointly Administered)

**DECLARATION OF DISINTERESTEDNESS OF COLE SCHOTZ P.C. PURSUANT TO
THE ORDER AUTHORIZING THE DEBTORS TO RETAIN AND COMPENSATE
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

I, Luis Salazar, declare under penalty of perjury as follows:

1. I am a shareholder of the law firm of Cole Schotz P.C. (“**Cole Schotz**” or the “**Firm**”). Cole Schotz is a law firm of over 200 attorneys, having its principal offices at Court Plaza North, 25 Main Street, Hackensack, New Jersey 07601, with other offices in New York, Delaware, Maryland, Texas, Florida, and Washington, D.C.
2. Avenger Flight Group, LLC and certain of its affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”), have requested that the Firm provide legal services to the Debtors, and the Firm has consented to provide such services.
3. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to these chapter 11 cases for persons

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.



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that are parties in interest in these chapter 11 cases. However, the Firm does not perform services for any such person relating to these chapter 11 cases and does not have any relationship with any such person, their attorneys, or their accountants that would be adverse to the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

4. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these chapter 11 cases.

5. Neither I nor any principal, partner, director, or officer of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

6. Neither I nor any principal, partner, director, or officer of, or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

7. As of February 11, 2026 (the “**Petition Date**”), the Debtors owed the Firm \$3,170.00 for prepetition services, the payment of which is subject to the limitations contained in title 11 of the United States Code (the “**Bankruptcy Code**”).

8. As of the Petition Date, the Firm was retained to provide professional services to the Debtors, and was retained, effective as of June 2, 2025, to:

a. represent Avenger Flight Group, LLC as a creditor in connection with the matter of *In re Silver Airways, LLC*; Case No. 24-23623-PDR, pending in the United States Bankruptcy Court, for the Southern District of Florida; and

b. represent Avenger Flight Group, LLC in pursuit of claims against Flight Training International, Inc. in connection with the matter of *Avenger Flight Group, LLC v.*

Flight Training International, Inc.; Case No. 2022-023354-CA-01, pending in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida.

9. As of the Petition Date, the Firm was not party to an agreement for indemnification with certain of the Debtors.

10. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained herein.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 24, 2026



LUIS SALAZAR