

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS² SCHEDULED FOR
HEARING ON MARCH 11, 2026 AT 11:30 A.M. (EASTERN TIME)**

This hearing will be conducted by Zoom. Parties and witnesses are permitted, but not required, to appear in person. The Court has no preference.

**To attend the hearing remotely, please register using the ecourt appearances tool on the court's website at www.deb.uscourts.gov or click the below link:
<https://ecf.deb.uscourts.gov/cgi-bin/nysbappearances.pl>.**

Parties are required to register for the hearing no later than 4:00 P.M. (prevailing Eastern Time) the business day before the hearing. You must use your full name when logging into zoom or you will not be allowed into the meeting.

After registering your appearance, you will receive a confirmation email. Zoom information will be sent out prior to the hearing.

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.

² All motions and other pleadings referenced herein are available online at the following web address: www.veritaglobal.net/AvengerFG.



RESOLVED MATTERS

1. Motion for Entry of Interim and Final Orders: (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Filed: 2/12/26] ([Docket No. 6](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Interim Order (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Filed: 2/13/26] ([Docket No. 66](#))
- (b) Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders: (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Filed: 2/13/26] ([Docket No. 75](#))
- (c) Certification of Counsel Regarding Final Order (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Filed: 3/6/26] ([Docket No.133](#))
- (d) [Signed] Final Order (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Filed: 3/9/26] ([Docket No. 140](#))

Status: An order has been entered.

2. Motion for Entry of Interim and Final Orders: (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief [Filed: 2/12/26] ([Docket No. 7](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Interim Order (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief [Filed: 2/13/26] ([Docket No. 67](#))
- (b) Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders: (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief [Filed: 2/13/26] ([Docket No. 74](#))
- (c) Certification of Counsel Regarding Final Order (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief [Filed: 3/5/26] ([Docket No. 121](#))
- (d) Final Order (I) Authorizing the Payment of Certain Taxes and Fees; and (II) Granting Related Relief [Filed: 3/6/26] ([Docket No. 127](#))

Status: An order has been entered.

- 3. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies and Programs, (B) Honor all Insurance Obligations, (C) Renew, Amend, Supplement, Extend, or Purchase and Finance Insurance Policies; (II) Authorizing Continuation of Insurance Premium Financing Agreement; and (III) Granting Related Relief [Filed: 2/12/26] ([Docket No. 8](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Interim Order (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies and Programs, (B) Honor all Insurance Obligations, (C) Renew, Amend, Supplement, Extend, or Purchase and Finance Insurance Policies; (II) Authorizing Continuation of Insurance Premium Financing Agreement; and (III) Granting Related Relief [Filed: 2/13/26] ([Docket No. 68](#))
- (b) Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies and Programs, (B) Honor all Insurance Obligations, (C) Renew, Amend, Supplement, Extend, or Purchase and Finance Insurance Policies; (II) Authorizing Continuation of Insurance Premium Financing Agreement; and (III) Granting Related Relief [Filed: 2/13/26] ([Docket No. 78](#))
- (c) Certification of No Objection Regarding Final Order (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies and Programs, (B) Honor all Insurance Obligations, (C) Renew, Amend, Supplement, Extend, or Purchase and Finance Insurance Policies; (II) Authorizing Continuation of Insurance Premium Financing Agreement; and (III) Granting Related Relief [Filed: 3/6/26] ([Docket](#)

[No. 137](#))

- (d) [Signed] Final Order (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies and Programs, (B) Honor all Insurance Obligations, (C) Renew, Amend, Supplement, Extend, or Purchase and Finance Insurance Policies; (II) Authorizing Continuation of Insurance Premium Financing Agreement; and (III) Granting Related Relief [Filed: 3/9/26] ([Docket No. 142](#))

Status: An order has been entered.

- 4. Motion for Entry of Interim and Final Orders: (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 2/12/2] ([Docket No. 9](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Interim Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 2/13/26] ([Docket No. 69](#))
- (b) Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders: (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 2/13/26] ([Docket No. 79](#))
- (c) Certification of No Objection Regarding Final Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 3/6/26] ([Docket No. 134](#))
- (d) [Signed] Final Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Filed: 3/9/26] ([Docket No. 141](#))

Status: An order has been entered.

5. Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Granting Related Relief [Filed: 2/12/26] ([Docket No. 10](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Certification of Counsel Submitting Revised Proposed Form of Interim Cash Management Order [Filed: 2/17/26] ([Docket No. 85](#))
- (b) Interim Order (I) Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor and Pay Bank Fees, (C) Maintain Existing Business Forms, (D) Authorizing Maintenance of Corporate Card Programs; (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 2/18/26] ([Docket No. 86](#))
- (c) Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, (D) Authorizing Maintenance of Corporate Card Programs; and (E) Granting Related Relief [Filed: 2/18/26] ([Docket No. 88](#))
- (d) Certification of Counsel Regarding Second Interim Order (I) Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor and Pay Bank Fees, (C) Maintain Existing Business Forms, (D) Authorizing Maintenance of Corporate Card Programs; (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 3/8/26] ([Docket No. 138](#))
- (e) [Signed] Second Interim Order (I) Authorizing the Debtors to (A) Continue Operating Cash Management System, (B) Honor and Pay Bank Fees, (C) Maintain Existing Business Forms, (D) Authorizing Maintenance of Corporate Card Programs; (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 3/9/26] ([Docket No. 143](#))

Status: An order has been entered.

6. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing All Financial Institutions to Honor all Related Payment Requests; and (IV) Granting Related Relief [Filed: 2/12/26] ([Docket No. 11](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Interim Order (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing All Financial Institutions to Honor All Related Payment Requests; and (IV) Granting Related Relief [Filed: 2/13/26] ([Docket No. 70](#))
- (b) Notice of Entry of Interim Order and Final Hearing Regarding Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing All Financial Institutions to Honor All Related Payment Requests; and (IV) Granting Related Relief [Filed: 2/13/26] ([Docket No. 77](#))
- (c) Certification of Counsel Regarding Final Order (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing All Financial Institutions to Honor All Related Payment Requests; and (IV) Granting Related Relief [Filed: 3/5/26] ([Docket No. 122](#))
- (d) Final Order (I) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, and Lien Claimants; (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders; (III) Authorizing All Financial Institutions to Honor All Related Payment Requests; and (IV) Granting Related Relief [Filed: 3/5/26] ([Docket No. 128](#))

Status: An order has been entered.

7. 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 [Filed: 2/12/26] ([Docket No. 16](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Notice of Hearing on 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 [Filed: 2/13/26] ([Docket No. 71](#))

- (b) 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 [Filed: 3/5/26] ([Docket No. 118](#))
- (c) 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 [Filed: 3/6/26] ([Docket No. 125](#))

Status: An order has been entered.

- 8. Motion of Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [Filed: 2/19/26] ([Docket No. 89](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Certificate of No Objection Regarding Motion of Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [Filed: 3/5/26] ([Docket No. 123](#))
- (b) Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief [Filed: 3/6/26] ([Docket No. 129](#))

Status: An order has been entered.

- 9. Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and Rule 2015.3 Financial Reports, and (II) Granting Related Relief [Filed: 2/19/26] ([Docket No. 90](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time

Responses Received: None.

Related Documents:

- (a) Certification of No Objection Regarding Motion for Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and Rule 2015.3 Financial Reports, and (II) Granting Related

Relief [Filed: 3/5/26] ([Docket No. 119](#))

- (b) Order (I) Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and Rule 2015.3 Financial Reports, and (II) Granting Related Relief [Filed: 3/6/26] ([Docket No. 126](#))

Status: An order has been entered.

MATTER UNDER CERTIFICATION OF COUNSEL

- 10. Motion for Entry of Order (I) Authorizing Debtors to Enter Into Settlement Agreement with Sim International B.V. and Lenders, and (II) Granting Related Relief [Filed: 2/12/26] ([Docket No. 35](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time
Extended for the Committee to March 9, 2026 at 12:00 noon (ET)

Responses Received: None.

Related Documents:

- (a) Notice of Hearing on Motion for Entry of Order (I) Authorizing Debtors to Enter Into Settlement Agreement with Sim International B.V. and Lenders, and (II) Granting Related Relief [Filed: 2/13/26] ([Docket No. 72](#))
- (b) Certification of Counsel Regarding Motion for Entry of Order (I) Authorizing Debtors to Enter Into Settlement Agreement with Sim International B.V. and Lenders, and (II) Granting Related Relief [Filed: 3/9/26] ([Docket No. 139](#))

Status: A certification of counsel has been filed. No hearing is necessary unless the Court has questions.

MATTERS GOING FORWARD

- 11. 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 [Filed: 2/12/26] ([Docket No. 12](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time
Extended for Spirit Airlines to March 2, 2026 at 4:00 p.m. (ET)
Extended for the Committee to March 9, 2026 at 11:59 p.m. (ET)

Responses Received: None to date.

Related Documents:

- (a) Amended Notice of Interim Hearing on Debtors' Motion for Interim Approval of Debtor in Possession Financing and Related Relief [Filed: 2/12/26] ([Docket No. 30](#))
- (b) Interim Order (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (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 [Filed: 2/13/26] ([Docket No. 59](#))
- (c) Notice of Entry of Interim Order and Final Hearing Regarding 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 [Filed: 2/13/26] ([Docket No. 64](#))

Status: This matter is going forward. The Debtors, the DIP Lenders and the Committee are working to resolve open issues prior to the hearing.

- 12. Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors' Assets; (B) Approving Certain Bid Protections in Connection with the Debtors' Entry into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors' Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/12/26] ([Docket No. 13](#))

Response Deadline: February 27, 2026, at 4:00 p.m. Eastern Time
Extended for the Committee to March 9, 2026 at 11:59 p.m. (ET)

Responses Received:

- (a) Limited Objection of the United States Trustee to Debtors' Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/24/26] ([Docket No. 93](#))

Related Documents:

- (a) Declaration of Michael B. Cox in Support of Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/12/26] ([Docket No. 15](#))
- (b) Notice of Hearing on Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/13/26] ([Docket No. 73](#))

Status: This matter is going forward. The Debtors, the DIP Lenders and the Committee are working to resolve open issues prior to the hearing.

Dated: March 9, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

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