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*Special Merger and Acquisition and Aviation
 Financing Counsel to the Winddown Debtors*

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
Voyager Aviation Holdings, LLC <i>et al.</i> ,)	Case No. 23-11177 (JPM)
Debtors. ¹)	(Jointly Administered)

CERTIFICATE OF NO OBJECTION

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), and in accordance with this Court’s case management procedures set forth in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Docket No. 146] (the “Case Management Order”),

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Voyager Aviation Holdings, LLC (8601); A330 MSN 1432 Limited (N/A); A330 MSN 1579 Limited (N/A); Aetios Aviation Leasing 1 Limited (N/A); Aetios Aviation Leasing 2 Limited (N/A); Cayenne Aviation LLC (9861); Cayenne Aviation MSN 1123 Limited (N/A); Cayenne Aviation MSN 1135 Limited (N/A); DPM Investment LLC (5087); Intrepid Aviation Leasing, LLC (N/A); N116NT Trust (N/A); Panamera Aviation Leasing IV Limited (N/A); Panamera Aviation Leasing VI Limited (N/A); Panamera Aviation Leasing XI Limited (N/A); Panamera Aviation Leasing XII Designated Activity Company (N/A); Panamera Aviation Leasing XIII Designated Activity Company (N/A); Voyager Aircraft Leasing, LLC (2925); Voyager Aviation Aircraft Leasing, LLC (3865); Voyager Aviation Management Ireland Designated Activity Company (N/A); and Voyager Finance Co. (9652). The service address for each of the Debtors in these cases is 301 Tresser Boulevard, Suite 602, Stamford, CT 06901.



the undersigned counsel for the above-captioned debtors (the “Winddown Debtors”) hereby certifies as follows:

1. On September 19, 2024, the Debtors filed the *Notice of Presentment of Motion for Final Decree Closing Each of the Chapter 11 Cases Except VAH and VAMI* [Docket No. 969] (the “Motion”).

2. Objections or responses to the Motion were due on September 27, 2024, at 4:00 p.m., prevailing Eastern Time (the “Response Deadline”).

3. The Motion and related notices were served on September 19, 2024. *See Certificate of Service* [Docket No. 973].

4. Local Rule 9075-2 provides that the Motion and related order may be entered without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline, and (b) the attorney for the entity that filed the Motion complies with such rule. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Response Deadline and, to the best of my knowledge, no responsive pleading to the Motion has been (a) filed with the Court on the docket of the above-captioned chapter 11 cases, or (b) served on the Debtors or their counsel.

5. The Winddown Debtors and the Office of the United States Trustee have agreed to certain revisions to the relief requested in the Motion and a fully consensual revised form of proposed order is attached hereto as **Exhibit A** (the “Proposed Order”). A blackline of the Proposed Order setting forth the changes from the form annexed to the Motion is attached hereto as **Exhibit B**. Accordingly, the Debtors respectfully request entry of the Proposed Order granting the relief requested.

[Remainder of page intentionally left blank]

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

Dated: October 9, 2024
New York, New York

/s/ Lauren C. Doyle

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/s/ Michael J. Edelman

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*Special Merger and Acquisition and Aviation
Financing Counsel to the Winddown Debtors*

Exhibit A to Certificate of No Objection

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Voyager Aviation Holdings, LLC *et al.*,

Debtors.¹

) Chapter 11

) Case No. 23-11177 (JPM)

) (Jointly Administered)

**ORDER (I) AUTHORIZING THE FINAL DECREE
CLOSING EACH OF THE CHAPTER 11 CASES EXCEPT
VAH AND VAMI AND (II) GRANTING RELATED RELIEF**

Upon the Motion² of the Winddown Debtors, pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022, for entry of a final decree (this “Final Decree”) closing the open chapter 11 cases except the Remaining Cases, as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having reviewed the Motion and determined that the legal and factual bases set forth in

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Voyager Aviation Holdings, LLC (8601) (“VAH”); A330 MSN 1432 Limited (N/A); A330 MSN 1579 Limited (N/A); Aetios Aviation Leasing 1 Limited (N/A); Aetios Aviation Leasing 2 Limited (N/A); Cayenne Aviation LLC (9861); Cayenne Aviation MSN 1123 Limited (N/A); Cayenne Aviation MSN 1135 Limited (N/A); DPM Investment LLC (5087); Intrepid Aviation Leasing, LLC (N/A); N116NT Trust (N/A); Panamera Aviation Leasing IV Limited (N/A); Panamera Aviation Leasing VI Limited (N/A); Panamera Aviation Leasing XI Limited (N/A); Panamera Aviation Leasing XII Designated Activity Company (N/A); Panamera Aviation Leasing XIII Designated Activity Company (N/A); Voyager Aircraft Leasing, LLC (2925); Voyager Aviation Aircraft Leasing, LLC (3865); Voyager Aviation Management Ireland Designated Activity Company (N/A) (“VAMI”); and Voyager Finance Co. (9652). The service address for each of the Debtors in these cases is 301 Tresser Boulevard, Suite 602, Stamford, CT 06901.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

the Motion establish just cause for the relief granted herein; and this Court having found that the relief requested in the Motion is in the best interests of the Winddown Debtors, their estates and creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Chapter 11 Cases of the following Closed Winddown Debtors are hereby closed; *provided* that this Court shall retain jurisdiction as provided in the Plan, the Confirmation Order, and this Final Decree:

Closed Winddown Debtors ³	Case No.
A330 MSN 1432 Limited	23-11178
A330 MSN 1579 Limited	23-11179
Cayenne Aviation LLC	23-11191
Cayenne Aviation MSN 1123 Limited	23-11181
Cayenne Aviation MSN 1135 Limited	23-11183
DPM Investment LLC	23-11193
Intrepid Aviation Leasing, LLC	23-11196
N116NT Trust	23-11188
Panamera Aviation Leasing IV Limited	23-11185
Panamera Aviation Leasing VI Limited	23-11186
Panamera Aviation Leasing XI Limited	23-11189
Voyager Aircraft Leasing, LLC	23-11197
Voyager Aviation Aircraft Leasing, LLC	23-11195
Voyager Finance Co.	23-11194

3. The Winddown Debtors shall pay the U.S. Trustee any quarterly fees due pursuant to 28 U.S.C. § 1930, together with any applicable interest due pursuant to 31 U.S.C. § 3717, within 10 days of the entry of this Order of Final Decree. Within 10 days after the entry of the Order, each of the Winddown Debtors shall file and transmit to the U.S. Trustee Post-Confirmation

³ The Winddown Debtors include each of the Debtors listed below along with the Remaining Debtors (VAH and VAMI).

Reports indicating cash disbursements through the third quarter of 2024 and for any additional period concluding on or before the date that the Final Decree is entered by the Bankruptcy Court.

4. Kurtzman Carson Consultants LLC dba Verita Global (the “Solicitation Agent”) shall (a) prepare final claim registers for the clerk’s office, pursuant to the guidelines for implementing 28 U.S.C. § 156(c), and (b) box and transport all claims to the Federal Archives at the direction of the office of the Clerk of Court. The services of the Solicitation Agent as the official claims and noticing agent for the Debtors, pursuant to 28 U.S.C. § 156(c) and prior order of this Court, are hereby terminated and released.

5. Following entry of this Order, the Remaining Debtors shall file a consolidated closing report with respect to all of the Winddown Debtors, pursuant to Local Rule 3022-1.

6. Entry of this Final Decree is without prejudice to the rights of the Remaining Debtors, the Closed Winddown Debtors, or any party in interest to seek to reopen the chapter 11 cases for cause pursuant to section 350(b) of the Bankruptcy Code.

7. The Winddown Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree.

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Final Decree, including with respect to all matters described in Section IV.C. of the Plan, the Remaining Cases, and the Delayed Non-Participation Debtor Insurance Assets.

New York, New York
Dated: _____, 2024

HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

Exhibit B to Certificate of No Objection

Blackline

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
Voyager Aviation Holdings, LLC <i>et al.</i> ,)	
)	Case No. 23-11177 (JPM)
Debtors. ¹)	
)	(Jointly Administered)

**ORDER (I) AUTHORIZING THE FINAL DECREE
CLOSING EACH OF THE CHAPTER 11 CASES EXCEPT
VAH AND VAMI AND (II) GRANTING RELATED RELIEF**

Upon the Motion;² of ~~Reorganized~~the Winddown Debtors, pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022, for entry of a final decree (this “Final Decree”) closing the open chapter 11 cases except the Remaining Cases, as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

and 1409; and this Court having reviewed the Motion and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and this Court having found that the relief requested in the Motion is in the best interests of the ~~Reorganized~~Winddown Debtors, their estates and creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Chapter 11 Cases of the following Closed Winddown Debtors are hereby closed; *provided* that this Court shall retain jurisdiction as provided in the Plan, the Confirmation Order, and this Final Decree:

Closed Winddown Debtors³	Case No.
A330 MSN 1432 Limited	23-11178
A330 MSN 1579 Limited	23-11179
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Voyager Finance Co.	23-11194

3. The Winddown Debtors shall pay the U.S. Trustee any quarterly fees due pursuant to 28 U.S.C. § 1930, together with any applicable interest due pursuant to 31 U.S.C. § 3717,

³ The Winddown Debtors include each of the Debtors listed below along with the Remaining Debtors (VAH and VAMI).

within ~~25~~10 days of the entry of this Order of Final Decree. Within ~~20~~10 days after the entry of the Order, each of the Winddown Debtors shall ~~provide~~file and transmit to the U.S. Trustee ~~an affidavit~~Post-Confirmation Reports indicating cash disbursements through the third quarter of 2024 and for any additional period concluding on or before the date that the Final Decree is entered by the Bankruptcy Court.

4. Kurtzman Carson Consultants LLC dba Verita Global (the “Solicitation Agent”) shall (a) prepare final claim registers for the clerk’s office, pursuant to the guidelines for implementing 28 U.S.C. § 156(c), and (b) box and transport all claims to the Federal Archives at the direction of the office of the Clerk of Court. The services of the Solicitation Agent as the official claims and noticing agent for the Debtors, pursuant to 28 U.S.C. § 156(c) and prior order of this Court, are hereby terminated and released.

5. Following entry of this Order, the Remaining Debtors shall file a consolidated closing report with respect to all of the Winddown Debtors, pursuant to Local Rule 3022-1.

6. Entry of this Final Decree is without prejudice to the rights of the Remaining Debtors, the Closed Winddown Debtors, or any party in interest to seek to reopen the chapter 11 cases for cause pursuant to section 350(b) of the Bankruptcy Code.

7. The Winddown Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree.

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Final Decree, including with respect to all matters described in Section IV.C. of the Plan, the Remaining Cases, and the Delayed Non-Participation Debtor Insurance Assets.

New York, New York

Dated: _____, 2024

HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE