Claim #38 Date Filed: 3/30/2026

UNITED STATES BANKRUPTCY COURT

DISTRICT OF DELAWARE

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U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:
Avenger Flight Group, LLC, et al.,
Debtors.

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

REQUEST FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM

Pursuant to 11 U.S.C. §503(b)(1)(A)

Claimant Information

Robyn Eldridge
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Claimant provided post-petition operational and regulatory management services to **Avenger Flight Training, LLC and affiliated debtors.**

Nature of Claim

Claimant respectfully requests allowance and payment of an administrative expense claim pursuant to 11 U.S.C. §503(b)(1)(A) in the amount of $250,000 for actual and necessary post-petition services, operational continuity support, and retention/transition value provided to the Debtors during their Chapter 11 proceedings.

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Background

Claimant has served in senior operational and regulatory leadership roles within the Debtors' flight training operations for multiple years, including holding **FAA-recognized management authority necessary for operation under 14 CFR Part 142.**

The Debtors commenced Chapter 11 proceedings in February 2026. Following the petition date, Claimant continued performing essential leadership and regulatory functions during a period of executive transition, restructuring, and bankruptcy-related operational uncertainty.

Regulatory Continuity Following Management Change

On or about January 13, 2026, the Debtors experienced a senior leadership transition involving replacement of the company's President.

Following this transition, and continuing after the commencement of the Chapter 11 cases, Claimant remained the only FAA-approved management official actively serving within the Debtors' Part 142 training center operations.

During this period, the Debtors explored the addition or replacement of management personnel associated with regulatory oversight responsibilities. Such changes required review and acceptance by the Federal Aviation Administration and were not immediately approved.

Accordingly, Claimant's continued service was necessary to maintain regulatory continuity, support ongoing training operations, and preserve the Debtors' ability to continue regulated business activities and maintain enterprise value during the restructuring process.

Post-Petition Services

Since the commencement of Chapter 11 cases, Claimant has:

- Continued serving in required FAA-recognized management roles
- Maintained regulatory communication and compliance continuity
- Supported ongoing pilot training programs involving regulatory oversight
- Provided operational leadership during executive vacancies and restructuring
- Assisted in stabilizing regulated training operations necessary to preserve estate value
- Remained available to support operational continuity and transition planning during the Debtors' sale process

These services were **actual, necessary, and beneficial to preserving the Debtors' estate.**

Benefit to the Estate

Claimant's continued post-petition services helped:

- Prevent disruption of regulated flight training operations
- Preserve regulatory approvals and operational continuity
- Support customer training commitments
- Maintaining going-concern value during the Chapter 11 sale process
- Reduce risk of operational or regulatory interruption

Accordingly, Claimant's services constitute administrative expenses under **11 U.S.C. §503(b)(1)(A).**

Basis for Amount Requested

The administrative expense amount requested reflects:

- Extraordinary post-petition responsibilities beyond normal compensated duties
- Reliance on Claimant for regulatory continuity during management transition
- Increased workload and risk exposure during the bankruptcy period
- Necessary retention and transition value associated with preserving estate operations and supporting continuity during the restructuring and sale process

Reservation of Rights

Claimant reserves the right to amend, supplement, or provide additional documentation in support of this request.

Relief Requested

WHEREFORE, Claimant respectfully requests that the Court:

1. Allow an administrative expense claim in the amount of **$250,000**
2. Direct payment of such claim
3. Grant such further relief as the Court deems just and proper

Dated: March 26, 2026