

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----X
:
In re : Chapter 11
:
JETFLEET HOLDING CORP., : Case No. 21-10637 (JTD)
:
Reorganized Debtor.¹ : Response Deadline: November 1, 2021 at 4:00 p.m. (ET)
:
-----X

REORGANIZED DEBTOR'S SECOND NOTICE OF SATISFACTION OF CLAIMS

PARTIES RECEIVING THIS NOTICE SHOULD LOCATE THEIR NAMES AND THEIR FULLY SATISFIED CLAIMS IDENTIFIED ON EXHIBIT 1 HERETO.

TO: (I) THE U.S. TRUSTEE; (II) COUNSEL TO THE PREPETITION LENDER; (III) CLAIMANTS WHOSE FULLY SATISFIED CLAIMS ARE SUBJECT TO THIS NOTICE; AND (IV) ALL PARTIES THAT, AS OF THE FILING OF THIS NOTICE, HAVE REQUESTED NOTICE IN THE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 2002.

PLEASE TAKE NOTICE that the above-captioned reorganized debtor (the “Debtor”) hereby files this notice (this “Notice”) identifying certain claims filed in the Chapter 11 Cases (as defined below) that have been fully satisfied after the Petition Date (the “Fully Satisfied Claims”). The Fully Satisfied Claims are listed on **Exhibit 1** hereto. In further support of this Notice, the Debtor respectfully represents as follows:

1. On March 29, 2021 (the “Petition Date”), the Debtor and its affiliates commenced with the Court voluntary cases (the “Chapter 11 Cases”) under chapter 11 of the Bankruptcy Code.

¹ The last four digits of the Reorganized Debtor’s federal tax identification number are 5342, and the Reorganized Debtor’s mailing address is 1325 Howard Ave., #614, Burlingame, CA 94010. The chapter 11 cases of the following affiliates of the Debtor were closed effective as of October 4, 2021: AeroCentury Corp. (3974) and JetFleet Management Corp. (0929) [See Chapter 11 Case No. 21-10636 (JTD), Docket No. 323].



The Debtor is authorized to continue operating its businesses and managing its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On April 20, 2021, the Court entered an order [Docket No. 81; Case No. 21-10636] (the “Bar Date Order”) providing that, except as otherwise provided therein or another order of the Court, (a) all persons or entities (including individuals, partnerships, corporations, joint ventures, and trusts) that assert a claim, as defined in section 101(5) of the Bankruptcy Code, against the Debtor (including, for the avoidance of doubt, secured claims, priority claims, and claims arising under section 503(b)(9) of the Bankruptcy Code) must file a proof of any such claim so that it is actually received on or before 5:00 p.m. (Eastern Time) on May 28, 2021 (the “General Bar Date”), and (b) all governmental units, as defined in section 101(27) of the Bankruptcy Code, must file a proof of claim so that it is actually received on or before 5:00 p.m. (Eastern Time) on September 27, 2021 (the “Governmental Bar Date”).

3. The Bar Date Order also provides that if the Debtor amends or supplements the Schedules after the date of service of the Bar Date Notice (as defined in the Bar Date Order), then the Debtor must give notice of any such amendment or supplement to the holders of claims affected thereby, and such holders will be afforded the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, and (b) 5:00 p.m. (Eastern Time) on the date that is 21 days from the date on which the Debtor provides notice of an amendment or supplement to the Schedules (which notice will include a reference to the Amended Schedules Bar Date) as the deadline by which claimants holding claims affected by such filing, amendment, or supplement must file proofs of claim with respect to such claim (the “Amended Schedules Bar Date”).

4. Additionally, pursuant to the Bar Date Order, except as otherwise provided by another order of the Court, any person or entity that holds a claim arising from the rejection of an

executory contract or unexpired lease (a “Rejection Damages Claim”) must file a proof of claim on account of such Rejection Damages Claim on or before the later of (a) the General Bar Date or the Governmental Bar Date, and (b) 5:00 p.m. (Eastern Time) on the date that is 21 days after service of an order authorizing rejection of an executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party the “Rejection Damages Bar Date,” and together with the General Bar Date, the Governmental Bar Date, and the Amended Schedules Bar Date, the “Bar Dates”).

5. Notice of the Bar Dates was provided by mail and publication in accordance with the procedures outlined in the Bar Date Order.

6. On August 31, 2021, the Court entered an order [Docket No. 296; Case No. 21-10636] confirming the *Combined Disclosure Statement and Joint Chapter 11 Plan of AeroCentury Corp., and its Affiliated Debtors* [Docket No. 225; Case No. 21-10636] (the “Plan”). The Plan became effective on October 1, 2021. *See* Docket No. 296; Case No. 21-10636.

SCHEDULES, PROOFS OF CLAIM, AND CLAIMS RECONCILIATION

7. On April 28, 2021 the Debtor filed its schedules of assets and liabilities and statements of financial affairs (collectively, and as may be modified, amended, or supplemented from time to time, the “Schedules”) [Docket Nos. 89-96; Case No. 21-10636].

8. The Debtor’s register of claims (the “Claims Register”), maintained by KCC, shows that approximately 45 proofs of claim (the “Claims”) have been filed in the Chapter 11 Cases alleging claims against the Debtor and/or its affiliates.

CLAIMS SATISFIED AFTER PETITION DATE

9. The Debtor has reviewed its books and records and determined that the Fully Satisfied Claims were satisfied in full after the Petition Date as set forth on **Exhibit 1** hereto.

10. Accordingly, the Debtor intends to have Kurtzman Carson Consultants (“KCC”) designate on the claims register in the Chapter 11 Cases that the Fully Satisfied Claims have been satisfied as set forth on Exhibit 1 hereto. Out of an abundance of caution, however, the Debtor is serving this Notice on all parties holding the Fully Satisfied Claims, and providing such parties with an opportunity to respond to the Debtor’s position that such amounts have been fully satisfied.

11. **Any party disputing the Debtor’s position that a particular Fully Satisfied Claim has been satisfied as set forth on Exhibit 1 hereto must file a written response with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and serve such response on the undersigned counsel to the Debtor, on or before November 1, 2021 at 4:00 p.m. (ET) (the “Objection Deadline”).** To the extent that an objection is filed and served in accordance with the procedures set forth herein, the Debtor shall attempt to consensually resolve such objection. In the event that the parties are unable to reach a resolution, a hearing will be held on the matter on a date to be separately noticed.

12. **If no objections are received prior to the Objection Deadline, KCC shall update the Claims Register as set forth herein without further order of the Court.**

13. Questions concerning this Notice should be directed to the Debtor’s counsel in writing at the following addresses: (a) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801, Attn: Joseph M. Barry, Joseph M. Mulvihill, and S. Alexander Faris (emails: jbarry@ycst.com, jmulvihill@ycst.com, and afaris@ycst.com); and (b) Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019, Attn: Lorenzo Marinuzzi and Raff Ferraioli (emails: lmarinuzzi@mofo.com and rferraioli@mofo.com). Claimants should not contact the Clerk of the Court to discuss the merits of their Fully Satisfied Claims or this Notice.

RESERVATION OF RIGHTS

14. The Debtor and its estate reserve any and all rights to amend, supplement, or otherwise modify this Notice and the Schedules and to file additional notices of this nature with respect to any and all (a) claims filed in the Chapter 11 Cases and (b) amounts scheduled against the Debtor's estate in the Schedules. The Debtor and its estate also reserve any and all rights, claims, and defenses with respect to any and all of the Fully Satisfied Claims, and nothing included in or omitted from this Notice will impair, prejudice, waive, or otherwise affect any such rights, claims and defenses.

Dated: October 18, 2021
Wilmington, Delaware

/s/ Joseph M. Mulvihill

Joseph M. Barry (No. 4221)

Ryan M. Bartley (No. 4985)

Joseph M. Mulvihill (No. 6061)

S. Alexander Faris (No. 6278)

YOUNG CONAWAY STARGATT & TAYLOR, LLP

1000 N. King Street

Rodney Square

Wilmington, Delaware 19801

Telephone: (302) 571-6600

Facsimile: (302) 571-1253

E-mails: jbarry@ycst.com

rbartley@ycst.com

jmulvihill@ycst.com

afaris@ycst.com

-and-

Lorenzo Marinuzzi (admitted *pro hac vice*)

Raff Ferraioli (admitted *pro hac vice*)

MORRISON & FOERSTER LLP

250 West 55th Street

New York, NY 10019-9601

Telephone: (212) 468-8000

Facsimile: (212) 468-7900

E-mails: lmarinuzzi@mofo.com

rferraioli@mofo.com

Counsel to the Reorganized Debtor

EXHIBIT 1

Fully Satisfied Claims

Name	Date Filed	Debtor	Claim No.	Asserted Claim Amount	Reason for Satisfaction
AeroCentury Corp.	N/A	JetFleet Management Corp.	Scheduled	\$342,030.00	Claim satisfied by payment pursuant to the Cash Management Order at Docket No. 79; Case No. 21-10636.
American Express	N/A	JetFleet Management Corp.	Scheduled	\$3,880.80	Claim satisfied by payment pursuant to the Wage Order at Docket No. 78; Case No. 21-10636.
San Mateo Tax Collector	07/20/2021	JetFleet Management Corp.	45	\$102.57	Claim satisfied by payment made pursuant to the Tax Order at docket No. 76; Case No. 21-10636.
The Hartford Group	N/A	JetFleet Management Corp.	Scheduled	\$6,201.90	Claim satisfied by payment made pursuant to the Insurance Order at docket No. 75; Case No. 21-10636.
The IR Group	N/A	JetFleet Management Corp.	Scheduled	\$1,050.00	Scheduled amount has been satisfied in full.