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**ATTORNEYS FOR IRONSHORE  
SPECIALTY INSURANCE COMPANY**

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

**CHC GROUP, LTD., *ET AL.*,  
DEBTORS.**

§  
§ **CASE NO. 16-31854-BJH-11**  
§  
§ **CHAPTER 11**  
§ **JOINTLY ADMINISTERED**  
§

**SPAREBANK 1 SR-FINANS AS &  
SPAREBANKEN FINANS NORD-  
NORGE AS,**

**PLAINTIFFS,**

**v.**

**DEBTOR HELI-ONE LEASING  
(NORWAY) AS, CHC HELICOPTER  
S.A. AND IRONSHORE SPECIALTY  
INSURANCE COMPANY**

**DEFENDANTS.**

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§ **Adversary No. 16-03121-BJH**  
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**IRONSHORE SPECIALTY INSURANCE COMPANY'S  
MOTION TO DISMISS ADVERSARY COMPLAINT**



TO THE HONORABLE BARBARA J. HOUSER, UNITED STATES BANKRUPTCY JUDGE:

Ironshore Specialty Insurance Company (the "Ironshore") files this Motion (the "Motion to Dismiss") to dismiss the adversary proceeding complaint (the "Complaint") filed by Sparebank 1 SR-Finans AS and Sparebanken Finans Nord-Norge AS (collectively, "Sparebank"), and respectfully states as follows:

Pursuant to Federal Rule of Civil Procedure 12(b)(6) and Bankruptcy Rule 7012, Ironshore hereby seeks an order dismissing Sparebank's Complaint for failure to state a claim upon which relief can be granted by this Court. Pursuant to Local Bankruptcy Rule 7007-1(d), the substantive bases for the Motion to Dismiss are set forth in Ironshore's brief in support of the Motion to Dismiss (the "Brief").

WHEREFORE Ironshore, for the reasons set forth in the Brief, respectfully requests the Court to grant the Motion to Dismiss and grant such other and further relief to which Ironshore may be justly entitled.

Dated: September 15, 2016

Respectfully submitted,

**KANE RUSSELL COLEMAN & LOGAN PC**

By: /s/ Jason B. Binford

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**ATTORNEYS FOR IRONSHORE  
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**CERTIFICATE OF SERVICE**

This is to certify that service of the foregoing document was served through Electronic Notice for Registered Participants and, unless an alternative means of service is set forth below, has been sent to all other parties listed below by e-mail and by United States Mail, first class postage prepaid, on the 15th day of September, 2016.

/s/ Jason B. Binford

Jason B. Binford

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