JACKSON WALKER LLP Monica S. Blacker State Bar No. 00796534 2323 Ross Avenue, Suite 600 Dallas, Texas 75201 (214) 953-6000 – Telephone (214) 953-5822 – Fax mblacker@jw.com ATTORNEY FOR SPAREBANK 1 SR-FINANS AS AND SPAREBANKEN FINANS NORD-NORGE AS

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

IN RE:	§	CHAPTER 11
CHC GROUP LTD., ET. AL,	§	
	§	CASE NO. 16-31854-BJH-11
DEBTORS.	8	JOINTLY ADMINISTERED
	§	
SPAREBANK 1 SR-FINANS AS &	§	
SPAREBANKEN FINANS NORD-	§	
NORGE AS,	§	
PLAINTIFFS,	§	
	§	ADV. PRO. NO. 16-03121-BJH
V.	§	
	§	
DEBTOR HELI-ONE LEASING	§	
(NORWAY) AS, CHC HELICOPTER	§	
S.A. AND IRONSHORE SPECIALTY	§	
INSURANCE COMPANY,	§	
DEFENDANTS.	§	

SPAREBANK 1 SR-FINANS AS'S
AND SPAREBANKEN FINANS NORD-NORGE AS'S
RESPONSE TO (I) IRONSHORE SPECIALTY INSURANCE
COMPANY'S MOTION TO DISMISS ADVERSARY COMPLAINT AND
(II) HELI-ONE LEASING (NORWAY) AS AND CHC HELICOPTER S.A.'S
LIMITED JOINDER TO IRONSHORE SPECIALTY INSURANCE COMPANY'S
MOTION TO DISMISS ADVERSARY COMPLAINT AND MOTION TO ABSTAIN

SPAREBANK 1 SR-FINANS AS'S AND SPAREBANKEN FINANS NORD-NORGE AS'S RESPONSE TO (I) IRONSHORE SPECIALTY INSURANCE COMPANY'S MOTION TO DISMISS ADVERSARY COMPLAINT AND (II) HELI-ONE LEASING (NORWAY) AS AND CHC HELICOPTER S.A.'S LIMITED JOINDER TO IRONSHORE SPECIALTY INSURANCE COMPANY'S MOTION TO DISMISS ADVERSARY COMPLAINT AND MOTION TO ABSTAIN



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

COME NOW Sparebank 1 SR-Finans AS ("Sparebank 1") and Sparebanken Finans Nord-Norge AS ("Sparebanken N-N," and together with Sparebank 1, "Sparebank") and file their Response to (I) Ironshore Specialty Insurance Company's Motion to Dismiss Adversary Complaint and (II) Heli-One Leasing (Norway) AS and CHC Helicopter S.A.'s Limited Joinder to Ironshore Specialty Insurance Company's Motion to Dismiss Adversary Complaint and Motion to Abstain (the "Opposition"), and respectfully state as follows:

Sparebank hereby seeks an order denying *Ironshore Specialty Insurance Company's Motion to Dismiss Adversary Complaint* [Docket No. 8] (the "Motion to Dismiss"). Pursuant to rule 7007-1(d) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, the substantive bases for the Opposition are set forth in Sparebank's brief opposing the Motion to Dismiss (the "Opposition Brief").

WHEREFORE, Sparebank, for the reasons set forth in the Opposition Brief, respectfully requests that the Court grant an order denying the Motion to Dismiss in its entirety and granting Sparebank such other relief as is just.

Dated: November 2, 2016

Respectfully submitted,

JACKSON WALKER LLP 2323 Ross Avenue, Suite 600 Dallas, Texas 75201 (214) 953-6000 – Main Telephone (214) 953-6647 – Main Facsimile www.jw.com

By: <u>/s/ Monica S. Blacker</u>

Monica S. Blacker State Bar No. 00796534 (214) 953-5824 – Direct Phone (214) 661-6647 – Direct Fax Email address: mblacker@jw.com

Matthew D. Cavenaugh State Bar No. 24062656 (713) 752-4200 – Direct Phone (713) 752-4221 – Direct Fax Email address: mcavenaugh@jw.com

ATTORNEYS FOR SPAREBANK 1 SR-FINANS AS and SPAREBANKEN FINANS NORD-NORGE AS

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of November 2016, a true and correct copy of the foregoing has been served electronically, via United States mail, postage prepaid, or via facsimile to the following:

Stephen A. Youngman Weil Gotschal & Manges LLP 200 Crescent Court, Suite 300 Dallas, Texas 75201-6950 stephen.youngman@weil.com

Gary T. Holtzer Kelli DiBlasi Weil Gotschal & Manges LLP 767 Fifth Avenue New York, New York 10153-0119 gary.holtzer@weil.com kelly.diblasi@weil.com

Jasmine Ball Richard F. Hahn Debevoise & Plimpton LLP 919 Third Avenue New York, New York 10022 jball@debevoise.com rfhahn@debevoise.com

Joseph M. Coleman Jason B. Binford Kane Russell Coleman & Logan PC 1601 Elm Street Dallas, Texas 75201 jcoleman@krcl.com jbinford@krcl.com

/s/ Monica S. Blacker

Monica S. Blacker