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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.	§	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 ABSTAIN 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 ABSTAIN 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



17179351v.1

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 Abstain 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 Abstain* [Docket No. 10] (the "Motion to Abstain"). 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 Abstain (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 Abstain in its entirety and granting Sparebank such other relief as is just. Dated: November 2, 2016

Respectfully submitted,

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

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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:

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/s/ Monica S. Blacker

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