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**COUNSEL FOR DEFENDANT
AIRBUS HELICOPTERS, S.A.S.**

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

In re:

CHC GROUP LTD., *et al.*,

Debtors.

ECN CAPITAL (AVIATION) CORP.,

Plaintiff,

v.

AIRBUS HELICOPTERS, S.A.S.,

Defendant.

Chapter 11

Case No. 16-31854 (BJH)

(Jointly Administered)

Adv. Pro. No. 16-3151 (BJH)



DEFENDANT AIRBUS HELICOPTERS, S.A.S.’S DESIGNATION OF MATTERS OF TO BE INCLUDED IN THE RECORD CONCERNING THE COURT’S PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW REGARDING DEFENDANT AIRBUS HELICOPTERS, S.A.S.’S MOTION TO DISMISS FOR LACK OF SUBJECT MATTER AND PERSONAL JURISDICTION, AND ON THE GROUNDS OF FORUM NON CONVENIENS SIGNED ON MARCH 28, 2017 [DKT. 94]

COMES NOW, Defendant Airbus Helicopters, S.A.S. (“AH”), and hereby submits this its, Defendant Airbus Helicopters, S.A.S.’s Designation of Matters of to be Included in the Record Concerning the Court’s Proposed Findings of Fact and Conclusions of Law Regarding Defendant Airbus Helicopters, S.A.S.’s Motion to Dismiss for Lack of Subject Matter and personal Jurisdiction, and on the Grounds of Forum Non Conveniens Signed on March 28, 2017 [Dkt. 94], and requests the following items be included in the record transmitted to the District Court:

<u>Docket No.</u>	<u>Filing Party</u>	<u>Description</u>
1	ECN Capital (Aviation) Corp.	Complaint
24	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.’s Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and on the Grounds of <i>Forum Non Conveniens</i>
26	Airbus Helicopters, S.A.S.	Appendix in Support of Defendant Airbus Helicopters, S.A.S.’s Motion to Dismiss
32	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.’s Amended Brief in Support of Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and <i>Forum Non Conveniens</i>
47	Airbus Helicopters, S.A.S.	Notice of Hearing on Defendant’s Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and on the Grounds of <i>Forum Non Conveniens</i>
63	ECN Capital (Aviation) Corp.	Plaintiff’s Opposition to Defendant’s Motion to Dismiss

<u>Docket No.</u>	<u>Filing Party</u>	<u>Description</u>
64	ECN Capital (Aviation) Corp.	Declaration of Pietro J. Signoracci in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss
73	Court (Benjamin Kurtzer)	Transcript of Hearing on: [#23] Status Conference Re: Motion for Withdrawal of Reference, Filed by Defendant Airbus Helicopters (SAS); [#1] Status Conference Re: Scheduling Order; [#56] Defendant Airbus Helicopters, S.A.S.'s Motion for Continuance of Trial, Stay of Deadlines and Brief in Support, Filed by Defendant Airbus Helicopters (SAS)
74	ECN Capital (Aviation) Corp.	Plaintiff's Supplemental Memorandum of Law in Opposition to Defendant's Motion to Dismiss
75	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.'s Supplemental Brief in Support of Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and on the Grounds of <i>Forum Non Conveniens</i>
76	ECN Capital (Aviation) Corp.	Motion for Leave to File Plaintiff's Second Supplemental Memorandum of Law in Opposition to Defendant's Motion to Dismiss
77	ECN Capital (Aviation) Corp.	Plaintiff's Witness and Exhibit List for February 28, 2017 Hearing on Defendant's Motion to Dismiss
78	ECN Capital (Aviation) Corp.	Plaintiff's Second Supplemental Memorandum of Law in Opposition to Defendant's Motion to Dismiss
79	ECN Capital (Aviation) Corp.	Declaration of Martin Flumenbaum in Support of Plaintiff's Second Supplemental Memorandum of Law in Opposition to Defendant's Motion to Dismiss
80	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.'s Witness and Exhibit List for February 28, 2017 Hearing
81	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.'s Reply Brief in Support of Motion to Dismiss for Subject Matter and Personal Jurisdiction, and <i>Forum Non Conveniens</i>

<u>Docket No.</u>	<u>Filing Party</u>	<u>Description</u>
82	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.'s Supplemental (Corrective) Reply Brief in Support of Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and <i>Forum Non Conveniens</i>
86	Court (Benjamin Kurtzer)	Transcript of Hearing on Motion to Dismiss Adversary Proceeding for Lack of Subject Matter and Personal Jurisdiction and on the Grounds of Forum Non Conveniens Filed by Defendant Airbus Helicopters (SAS)
87	ECN Capital (Aviation) Corp.	Plaintiff's Supplemental Memorandum on Post-Hearing Developments Related to Personal Jurisdiction and Abstention
88	ECN Capital (Aviation) Corp.	Declaration of Pietro J. Signoracci in Support of Plaintiff's Supplemental Memorandum on Post-Hearing Developments Related to Personal Jurisdiction and Abstention
92	Airbus Helicopters, S.A.S.	Defendant Airbus Helicopters, S.A.S.'s Response to Plaintiff's Supplemental Memorandum on Post-Hearing Developments Related to Personal Jurisdiction and Abstention
94	Court (D. Moroles)	Proposed Findings of Fact and Conclusions of Law Regarding Defendant Airbus Helicopters, S.A.S.'s Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and on the Grounds of Forum Non Conveniens
95	Court (D. Moroles)	Report and Recommendation to the District Court Regarding Case No. 3:17-cv-00075-C (Adv. Pro. No. 16-3151-bjh)
104	ECN Capital (Aviation) Corp.	Plaintiff's Objection to the Bankruptcy Court's Proposed Findings of Fact and Conclusions of Law and Brief in Support
105	Court (Nicole Whittington)	Court admitted exhibits at February 28, 2017 hearing on Defendant Airbus Helicopters, S.A.S.'s Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and on the Grounds of <i>Forum Non Conveniens</i>

<u>Docket No.</u>	<u>Filing Party</u>	<u>Description</u>
106	Airbus Helicopters, S.A.S.	Response to Defendant Airbus Helicopters, S.A.S. to Plaintiff's Objection to the Bankruptcy Court's Proposed Findings of Fact and Conclusions of Law and Brief in Support
107	ECN Capital (Aviation) Corp.	Supplemental Appendix in Support of Plaintiff's Objection to the Bankruptcy Court's Proposed Findings of Fact and Conclusions of Law
N/A	N/A	True and correct copy of the Docket Report for Adv. Pro. No. 16-3151-bjh

AH also designates as part of the record any other document designated by any other party to this action.

Dated: May 2, 2017.

Respectfully submitted,

HIERSCHE, HAYWARD, DRAKELEY
& URBACH, P.C.

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**COUNSEL FOR DEFENDANT AIRBUS
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on May 2, 2017, a true and correct copy of the above and foregoing document was filed with the court via CM/ECF and served on all parties requesting electronic notification.

/s/ Jason M. Katz

Jason M. Katz