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Proposed Counsel to all Debtors and Debtors in Possession other than the Participation Debtors¹

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

Voyager Aviation Holdings, LLC et al.

Debtors.²

(Joint Administration Requested)

Case No. Case No. 23-11177 (JPM)

NOTICE OF COMMENCEMENT OF CHAPTER 11 CASES AND AGENDA FOR FIRST DAY HEARING

PLEASE TAKE NOTICE that on July 27, 2023 (the "<u>Commencement Date</u>"), Voyager Aviation Holdings, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "<u>Debtors</u>"), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>") with the United States Bankruptcy Court for the Southern District of New York (the "<u>Court</u>").

² The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Voyager Aviation Holdings, LLC (8601); A330 MSN 1432 Limited (N/A); A330 MSN 1579 Limited (N/A); Aetios Aviation Leasing 1 Limited (N/A); Aetios Aviation Leasing 2 Limited (N/A); Cayenne Aviation LLC (9861); Cayenne Aviation MSN 1123 Limited (N/A); Cayenne Aviation MSN 1135 Limited (N/A); DPM Investment LLC (5087); Intrepid Aviation Leasing, LLC (N/A); N116NT Trust (N/A); Panamera Aviation Leasing IV Limited (N/A); Panamera Aviation Leasing VI Limited (N/A); Panamera Aviation Leasing XII Designated Activity Company (N/A); Panamera Aviation Leasing XIII Designated Activity Company (N/A); Voyager Aircraft Leasing, LLC (2925); Voyager Aviation Aircraft Leasing, LLC (3865); Voyager Aviation Management Ireland Designated Activity Company (N/A); and Voyager Finance Co. (9652). The service address for each of the Debtors in these cases is 301 Tresser Boulevard, Suite 602, Stamford, CT 06901.



Cameron A. Gee, Esq. Michael J. Edelman, Esq. William W. Thorsness, Esq. (*pro hac vice pending*) Sarah E. King, Esq. **VEDDER PRICE P.C.** 1633 Broadway, 31st Floor New York, New York 10019 Telephone:(212) 407-7700 Facsimile: (212) 407-7799

Proposed Counsel to the Participation Debtors

¹ "Participation Debtors" means, collectively, Aetios Aviation Leasing 1 Limited, Aetios Aviation Leasing 2 Limited, Panamera Aviation Leasing XII Designated Activity Company, and Panamera Aviation Leasing XIII Designated Activity Company.

PLEASE TAKE FURTHER NOTICE that a hearing (the "<u>First Day</u> <u>Hearing</u>") has been scheduled for <u>July 28, 2023 at 12:00 p.m. (Prevailing Eastern Time</u>) before the Honorable Judge John P. Mastando III, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004, in order to consider, among other things, the relief requested by the Debtors in the First Day Pleadings (as defined below). The First Day Hearing will be conducted via Zoom for Government.

PLEASE TAKE FURTHER NOTICE that parties wishing to appear at the First Day Hearing, whether making a "live" or "listen only" appearance before the Court, must make an electronic appearance through the Court's website at <u>https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl</u>. Parties wishing to appear at the First Day Hearing must submit an electronic appearance through the Court's website and not by emailing or otherwise contacting the Court. Further information on the use of Zoom for Government can be found at the Court's website at <u>https://www.nysb.uscourts.gov/zoom-video-hearing-guide</u>.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the First Day Pleadings (as defined below) carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to consult with one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings (as defined below), or if you want the Court to consider your views on the First Day Pleadings, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings.

PLEASE TAKE FURTHER NOTICE that an agenda for the First Day Hearing is set forth below. Copies of each pleading identified below (the "First Day Pleadings") can be viewed and/or obtained by: (i) accessing the Court's website at http://www.nysb.uscourts.gov, Debtors' claims noticing KCC. (ii) from the proposed and agent, https://www.kccllc.net/voyageraviation or by calling +1 (877) 634-7163 (for callers within the United States and Canada) or +1 (424) 236-7219 (for international callers) or by e-mail via VoyagerAviationInfo@kccllc.com. Note that a PACER password is needed to access documents on the Court's website.

AGENDA FOR FIRST DAY HEARING

I. <u>Introduction</u>

II. Motions and Applications to Be Heard at the First Day Hearing

- 1. **Joint Administration Motion**. *Debtors' Motion for Entry of an Order Directing Joint Administration of These Chapter 11 Cases* [Docket No. 2]
- 2. **Cash Collateral Motion**. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Providing Adequate Protection,

23-11177-jpm Doc 18 Filed 07/27/23 Entered 07/27/23 23:55:29 Main Document Pg 3 of 5

(III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 3]

<u>**Related Document: Cash Collateral Declaration.** Declaration of Robert A. Del Genio in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Providing Adequate Protection, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief [Docket No. 4]</u>

- 3. Cash Management Motion. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Maintain Existing Business Forms and Books, (C) Engage in Intercompany Transactions; (II) Granting Administrative Expense Status to Intercompany Claims, and (III) Granting Related Relief [Docket No. 5]
- 4. Aircraft Lessee Reimbursement Demands Motion. Debtors' Motion for Interim and Final Orders (I) Authorizing Them to Continue to Honor Aircraft Lessee Reimbursement Demands and (II) Granting Related Relief [Docket No. 6]
- 5. **Taxes Motion**. Debtors' Motion for Entry of an Order (I) Authorizing Them to (A) Continue Paying Taxes and Fees in the Ordinary Course and (B) Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Docket No. 7]
- 6. **Insurance Motion**. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Them to Maintain Their Insurance Policies and Honor Related Obligations, and (II) Granting Related Relief [Docket No. 8]
- 7. Utilities Motion. Debtors' Motion for Entry of an Order (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Services, (II) Approving the Proposed Adequate Assurance of Payment for Future Services, (III) Approving Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief [Docket No. 9]
- 8. **Foreign Vendors Motion**. Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Certain Prepetition Claims of Foreign Vendors and Granting Related Relief [Docket No. 10]
- 9. Employee Benefits and Wages Motion. Debtors' Motion for an Entry of Interim and Final Orders (I) Authorizing them to (A) Continue Compensation and Benefits Programs, and (B) Satisfy Prepetition Obligations on Account of Compensation and Benefits Programs, and (II) Granting Related Relief [Docket No. 11]
- 10. Motion to Extend Time to File Schedules and SOFAs. Debtors' Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities, Schedule of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports [Docket No. 12]

23-11177-jpm Doc 18 Filed 07/27/23 Entered 07/27/23 23:55:29 Main Document Pg 4 of 5

- 11. **Motion to File Consolidated List of Creditors**. Debtors' Motion for Entry of an Order (I) Authorizing them to (A) Prepare and Maintain Consolidated List of Creditors in Lieu of a Separate Mailing Matrix for Each Debtor, (B) File Consolidated list of 30 Largest Unsecured Creditors, and (C) Redact Certain Personally Identifying Information, (II) Approving the Form and Manner of Notice of Commencement, and (III) Granting Related Relief [Docket No. 13]
- 12. Claims Agent Retention Application. Debtors' Application for Entry of an Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtors Pursuant to 28 U.S.C. § 156(C), 11 U.S.C. § 105(A), and S.D.N.Y. L.B.R. 5075-1 Effective as of the Petition Date [Docket No. 14]
- 13. Notice and Case Management Motion. Debtors' Motion Seeking Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures [Docket No. 15]

III. <u>Related Pleadings</u>

1. **First Day Declaration**. Declaration of Robert A. Del Genio, Chief Restructuring Officer, in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 16]

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Dated: July 27, 2023 New York, New York

<u>/s/ Lauren C. Doyle</u> Samuel A. Khalil, Esq. Lauren C. Doyle, Esq. Brian Kinney, Esq. Edward R. Linden, Esq. **MILBANK LLP** 55 Hudson Yards New York, NY 10001 Telephone:(212) 530-5000 Facsimile: (212) 530-5219 Email: skhalil@milbank.com Idoyle@milbank.com bkinney@milbank.com

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