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June 20, 2019

**VIA E-MAIL
BY HAND DELIVERY**

The Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York One
Bowling Green New York, New York
10004-1408

Re: Macquarie Allocation of WAC 9 Asset Value - *Macquarie Rotorcraft Leasing Holdings Limited v. LCI Helicopters (Ireland) Limited*, Adv. No. 19-01107-SMB (Bankr. S.D.N.Y.)

Dear Judge Bernstein:

At the hearing on *LCI Helicopters (Ireland) Limited's Motion to Dismiss Plaintiffs Adversary Complaint* [Docket Nos. 6, 9, & 11] earlier today, you inquired as to the amount or ratable percentage of Macquarie's overall bid for the Debtors' assets allocated to the WAC 9 assets in particular. After reviewing the relevant correspondence on the subject and the record in the chapter 11 cases, we have confirmed that Macquarie's allocation as between any of the asset groups was never made of record during the prior bankruptcy proceedings. Nor apparently was the amount of consideration paid by LCI to Lombard for the WAC 9 assets made of record during the prior proceedings. Consequently, the record does not indicate how much either of the interested bidders allocated to or paid for the WAC 9 assets.

Very truly yours,

Mark D. Pollack
of PAUL HASTINGS LLP

MDP

cc: All Counsel of Record

MEMORANDUM ENDORSEMENT AND ORDER

The Court is aware that the record does not disclose the allocation; that is why the Court directed counsel to provide the information. At oral argument, counsel for Macquarie indicated that if Lombard outbid Macquarie for the WAC 9 collateral, it would drop its damage claims asserted as assignee of the Debtors and proceed on the second claim for relief. Bankruptcy Rule 1001 provides that the rules "shall be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every case and proceeding." Disclosure of the allocation will promote this goal.

So ordered: 6/24/19

s/ *Stuart M. Bernstein*
STUART M. BERNSTEIN
United States Bankruptcy Judge



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