

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AVENGER FLIGHT GROUP, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10183 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS² SCHEDULED FOR
HEARING ON APRIL 7, 2026 AT 2:00 P.M. (EASTERN TIME)**

This hearing will be conducted by Zoom. Parties and witnesses are permitted, but not required, to appear in person. The Court has no preference.

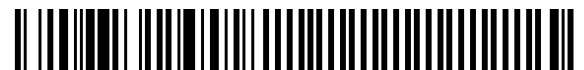
**To attend the hearing remotely, please register using the ecourt appearances tool on the court's website at www.deb.uscourts.gov or click the below link:
<https://ecf.deb.uscourts.gov/cgi-bin/nysbappearances.pl>.**

Parties are required to register for the hearing no later than 4:00 P.M. (prevailing Eastern Time) the business day before the hearing. You must use your full name when logging into zoom or you will not be allowed into the meeting.

After registering your appearance, you will receive a confirmation email. Zoom information will be sent out prior to the hearing.

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Avenger Flight Group, LLC (1216); AFG Dallas III, LLC (5615); AFG Dallas IV, LLC (5558); AFG Dallas, LLC (3418); AFG EU Operations Corp. (9406); AFG FLL, LLC (6470); AFG Latam Holding Corp. (6475); AFG Latam Sim Holdings II, LLC (0473); AFG Latam Sim Holdings III, LLC (2592); AFG Latam Sim Holdings IV, LLC (0093); AFG Latam Sim Holdings, LLC (6475); AFG Latam, LLC (9545); AFG Mexico Corp. (1402); AFG Orlando, LLC (8409); AFG Sanford, LLC (6661); AFG Sim Holding Corp. (3325); Avenger Flight Group Europe, Corp. (5908); Avenger Flight Group Topco, LLC (5643); Avenger Flight Training, LLC (5640); Avenger Flight Group Mexico II, S. de R.L. de C.V, (N/A); and Papi Flight Training, LLC (6206). The location of the Debtors' corporate headquarters and the Debtors' service address is Avenger Flight Group LLC, 1450 Lee Wagener Blvd., Fort Lauderdale, FL 33315.

² All motions and other pleadings referenced herein are available online at the following web address: www.veritaglobal.net/AvengerFG.



MATTER GOING FORWARD

1. Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors' Assets; (B) Approving Certain Bid Protections in Connection with the Debtors' Entry into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors' Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/12/26] ([Docket No. 13](#))

Sale Objection Deadline: April 6, 2026, at 12:00 p.m. Eastern Time

Responses Received:

- (a) Limited Objection of the United States Trustee to Debtors' Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/24/26] ([Docket No. 93](#))
- (b) Objection of Starr Indemnity & Liability Company and Starr Surplus Lines Insurance Company to Debtors' Notice of Potential Assumption and Assignment of Executory Contracts [Filed 3/30/26] ([Docket No. 245](#))
- (c) Spirit Airlines, LLC's Limited Objection and Reservation of Rights to (I) the Notice of Potential Assumption, Assumption and Assignment, or Transfer of Executory Contracts and Unexpired Leases (D.I. 163) and (II) the Debtors' Sale Motion (D.I. 13) [Filed 3/30/26] ([Docket No. 246](#))
- (d) Nation Fund I, LLC's Limited Objection to Notice of Potential Assumption, Assumption and Assignment, or Transfer of Executory Contracts and Unexpired Leases [Filed 3/30/26] ([Docket No. 247](#))
- (e) Limited Objection and Reservation of Rights of Exeter 920 Apollo, LLC in Response to Notice of Potential Assumption, Assumption and Assignment, or Transfer of Executory Contracts and Unexpired Leases [Filed 3/30/26] ([Docket No. 248](#))
- (f) Objection to Debtors' Proposed Cure Amount (DiMare Fresh, Inc.) [Filed 3/30/26] ([Docket No. 249](#))

Related Documents:

- (a) Declaration of Michael B. Cox in Support of Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/12/26] ([Docket No. 15](#))
- (b) Notice of Hearing on Motion for (I) an Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; (B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief; and (II) an Order or Orders (A) Approving the Sale of the Debtors Assets Free and Clear of All Encumbrances; and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases [Filed: 2/13/26] ([Docket No. 73](#))
- (c) Declaration of Lawrence Perkins in Support of Debtors' Chapter 11 Petitions and First Day Relief [Filed: 2/12/26] ([Docket No. 33](#))
- (d) Notice of Rescheduled Omnibus Hearing Date from March 6, 2026 at 11:30 a.m. (Eastern Time) to March 11, 2026 at 11:30 a.m. (Eastern Time) [Filed: 3/1/26] ([Docket No. 111](#))
- (e) Certification of Counsel Regarding Revised Order (A) Approving Bid Procedures for the Sale of the Debtors Assets; B) Approving Certain Bid Protections in Connection With the Debtors Entry Into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief [Filed: 3/10/25] ([Docket No. 151](#))
- (f) Order (A) Approving Bid Procedures for the Sale of the Debtors' Assets; (B) Approving Certain Bid Protections in Connection with the Debtors' Entry into Stalking Horse APA; (C) Scheduling the Auction and Sale Hearing; (D) Approving the Form and Manner of Notice Thereof; and (E) Granting Related Relief [Filed 3/11/26] ([Docket No. 161](#))
- (g) Notice of Proposed Sale or Sales of the Debtors' Assets, Free and Clear of All Encumbrances, Other than Assumed Liabilities, and Scheduling Final Sale Hearing [Filed 3/12/26] ([Docket No. 162](#))
- (h) Notice of Potential Assumption, Assumption and Assignment, or Transfer of Executory Contracts and Unexpired Leases [Filed 3/12/26] ([Docket No. 163](#))
- (i) Affidavit of Publication of the Notice of Proposed Sale or Sales of the Debtors Assets, Free and Clear of all Encumbrances, Other Than Assumed Liabilities, and Scheduling Final Sale Hearing Related Thereto [Filed 3/24/26] ([Docket No. 188](#))

- (j) Notice of Successful Bidder and Cancellation of Auction [Filed 3/30/26] (Docket No. 244)

Status: This matter is going forward.

Dated: April 2, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

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