

**Fill in this information to identify the case:**

Debtor Voyager Aviation Management Ireland Designated Activity Company  
 United States Bankruptcy Court for the: Southern District of New York  
 (State)  
 Case number 23-11176

**Official Form 410  
 Proof of Claim**

**04/22**

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

**Filers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

**Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.**

**Part 1: Identify the Claim**

<p><b>1. Who is the current creditor?</b></p>	<p><u>Hughes Hubbard and Reed LLP</u>                  Name of the current creditor (the person or entity to be paid for this claim)</p> <p>Other names the creditor used with the debtor _____</p>	
<p><b>2. Has this claim been acquired from someone else?</b></p>	<p><input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes. From whom? _____</p>	
<p><b>3. Where should notices and payments to the creditor be sent?</b></p> <p>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</p>	<p><b>Where should notices to the creditor be sent?</b></p> <p><u>Hughes Hubbard and Reed LLP</u>  <u>One Battery Park Plaza</u>  <u>New York, New York 10004, United States</u></p> <p>Contact phone <u>212-837-6000</u>                  Contact email <u>See summary page</u></p>	<p><b>Where should payments to the creditor be sent? (if different)</b></p> <p>Contact phone _____                  Contact email _____</p> <p>Uniform claim identifier for electronic payments in chapter 13 (if you use one):                  _____</p>
<p><b>4. Does this claim amend one already filed?</b></p>	<p><input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____                  MM / DD / YYYY</p>	
<p><b>5. Do you know if anyone else has filed a proof of claim for this claim?</b></p>	<p><input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes. Who made the earlier filing? _____</p>	



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 0055 \_\_\_\_

7. How much is the claim? \$ 3,162.50. Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
Limit disclosing information that is entitled to privacy, such as health care information.  
Services performed pursuant to agreement. See annex.

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.  
**Nature or property:**  
 Real estate: If the claim is secured by the debtor's principle residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amount should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

	Amount entitled to priority
<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
<input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.	\$ _____

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ \_\_\_\_\_

**Part 3: Sign Below**

**The person completing this proof of claim must sign and date it. FRBP 9011(b).**

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

**A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.**

*Check the appropriate box:*

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 10/24/2023  
MM / DD / YYYY

/s/Jeffrey S. Margolin  
Signature

**Print the name of the person who is completing and signing this claim:**

Name Jeffrey S. Margolin  
First name Middle name Last name

Title Counsel

Company Hughes Hubbard and Reed LLP  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address \_\_\_\_\_

Contact phone \_\_\_\_\_ Email \_\_\_\_\_



# KCC ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (877) 634-7163 | International (424) 236-7219

<b>Debtor:</b> 23-11176 - Voyager Aviation Management Ireland Designated Activity Company		
<b>District:</b> Southern District of New York, New York Division		
<b>Creditor:</b> Hughes Hubbard and Reed LLP One Battery Park Plaza  New York, New York, 10004 United States <b>Phone:</b> 212-837-6000 <b>Phone 2:</b>  <b>Fax:</b>  <b>Email:</b> jeff.margolin@hugheshubbard.com	<b>Has Supporting Documentation:</b> Yes, supporting documentation successfully uploaded <b>Related Document Statement:</b>	<b>Has Related Claim:</b> No <b>Related Claim Filed By:</b>
<b>Other Names Used with Debtor:</b>	<b>Amends Claim:</b> No <b>Acquired Claim:</b> No	
<b>Basis of Claim:</b> Services performed pursuant to agreement. See annex.	<b>Last 4 Digits:</b> Yes - 0055	<b>Uniform Claim Identifier:</b>
<b>Total Amount of Claim:</b> 3,162.50	<b>Includes Interest or Charges:</b> No	
<b>Has Priority Claim:</b> No	<b>Priority Under:</b>	
<b>Has Secured Claim:</b> No <b>Amount of 503(b)(9):</b> No <b>Based on Lease:</b> No <b>Subject to Right of Setoff:</b> No	<b>Nature of Secured Amount:</b> <b>Value of Property:</b> <b>Annual Interest Rate:</b> <b>Arrearage Amount:</b> <b>Basis for Perfection:</b> <b>Amount Unsecured:</b>	
<b>Submitted By:</b> Jeffrey S. Margolin on 24-Oct-2023 1:39:23 p.m. Eastern Time <b>Title:</b> Counsel <b>Company:</b> Hughes Hubbard and Reed LLP		

## **RIDER TO PROOF OF CLAIM**

1. By this Proof of Claim, Hughes Hubbard & Reed LLP (“Hughes Hubbard”), acting in accordance with the Bar Date Order,<sup>1</sup> asserts claims against Voyager Aviation Management Ireland Designated Activity Company (the “Debtor,” and together with Hughes Hubbard, the “Parties”) to recover, among other things, fees owed to Hughes Hubbard by the Debtor as of the July 27, 2023 (the “Petition Date”).

2. **Claim Basis and Amount.** Hughes Hubbard acted as counsel to Wells Fargo Trust Company, N.A. (“Wells Fargo”) in connection with a certain transaction with the Debtor. The underlying transaction documents, which Hughes Hubbard believes are in the possession of the Debtor, provide for indemnification of the Wells Fargo’s fees (including their outside counsel Hughes Hubbard) in connection with the transaction.

3. As of the Petition Date, the Debtor was, and still is, indebted (or liable) to Hughes Hubbard for (i) the liquidated and non-contingent amount of not less than \$3,162.50 as provided in Exhibit A annexed hereto; and (ii) all unliquidated amounts set forth below ((i) and (ii), together, the “Claims”).

4. In addition to the fees described herein, as of the Petition Date, the Debtor is absolutely and unconditionally indebted to Hughes Hubbard for any and all amounts due or to become due with respect to, arising from, or in connection with any additional legal fees and expenses incurred by Hughes Hubbard in connection with the above-referenced transaction. The total of such amounts cannot, at this time, be reasonably calculated or estimated, and Hughes

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1. The “Bar Date Order” refers to the Order (I) Setting Bar Dates for Submitting Proofs of Claim, (II) Approving Procedures for Submitting Proofs of Claim, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims, and (IV) Approving Form and Manner of Notice Thereof entered by the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) on September 20, 2023.

Hubbard does not waive any rights with respect to such amounts by not stating a specific figure therefor at this time.

5. **Reservation of Rights and Amendments.** Hughes Hubbard reserves all rights to assert that all or a portion of the Claim asserted herein are entitled to administrative priority under Sections 503 and 507 of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”). This Claim is filed without prejudice to the right of Hughes Hubbard to request payment of any administrative expense claims that Hughes Hubbard may have against the Debtor. Hughes Hubbard reserves the right to request payment of such administrative expenses at a later date or as required by the Bankruptcy Court, the Bankruptcy Code, or other applicable law.

6. The assertion of Claims herein is not a concession or admission as to the correct characterization or treatment of any such Claims. Specifically, Hughes Hubbard’s execution and filing of the Proof of Claim does not constitute: (a) waiver or release of Hughes Hubbard’s rights against any other entity or person liable for all or part of the Claims; (b) consent by Hughes Hubbard to the jurisdiction of the Bankruptcy Court with respect to any proceeding commenced against or otherwise involving Hughes Hubbard; (c) consent by Hughes Hubbard to the treatment of any non-core claim against it as a core claim; (d) waiver of the right to move to withdraw the reference with respect to the subject matter of the Claims or otherwise; (e) waiver of any right to the subordination, in favor of Hughes Hubbard, of indebtedness or liens held by other creditors of the Debtor; (f) an election of remedies that waives or otherwise affects any other remedies; or (g) waiver of any right to arbitration or other alternative dispute resolution mechanism that is otherwise applicable.

7. Hughes Hubbard expressly reserves its right to amend and supplement this Proof of Claim to the fullest extent permitted by law, including, without limitation, to specify (and

quantify) damages, costs, expenses, and other charges or claims incurred in connection with this Proof of Claim or otherwise and to file additional proofs of claim for such additional claims, including, without limitation, claims for post-petition interest, legal fees, and related expenses that are not ascertainable at this time.

8. **Notices.** All notices and communications with respect to this Proof of Claim should be sent to:

Jeffrey S. Margolin, Esq.  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza  
New York, New York 10004  
Telephone: (212) 837-6000  
Facsimile: (212) 422-4726  
Email: [jeff.margolin@hugheshubbard.com](mailto:jeff.margolin@hugheshubbard.com)

**Exhibit A**



Panamera Aviation Leasing XIII DAC  
Voyager Aviation Management Ireland DAC

Invoice No. 2148181

April 14, 2023



**Re: Wells Fargo/Intrepid Direction Matter**  
**Our File No.: 020431-00055**

For professional services and legal advice rendered for the period through April 13, 2023 in connection with our representation of Wells Fargo Trust Company, N.A., in its capacity as Security Trustee, in Carlyle's initiation of litigation proceedings in the UK with respect to insurance and reinsurance claims concerning MSN 63781, including:

- (i) Reviewing and revising the common interest agreement;
- (ii) Reviewing insurance and sanctions issues arising from the subject litigation; and
- (iii) Telephone conferences and correspondence and advice and consultation in connection with the foregoing.

Fees	\$	3,162.50
<b>INVOICE TOTAL</b>	<b>\$</b>	<b><u>3,162.50</u></b>

BILLS ARE DUE AND PAYABLE UPON RECEIPT  
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE  
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING

