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

Proposed Counsel to the Participation Debtors

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
Voyager Aviation Holdings, LLC <i>et al.</i>)	Case No. 23-11177 (JPM)
Debtors. ²)	(Joint Administration Requested)

**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**

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.

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 XI 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.



**INFORMATION, (II) APPROVING THE FORM AND MANNER OF
NOTICE OF COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

By this motion (the “Motion”), Voyager Aviation Holdings, LLC and its proposed jointly administered debtors and debtors in possession (collectively, the “Debtors”) seek entry of an order (the “Order”) authorizing them to (i) maintain a consolidated mailing matrix in lieu of a separate mailing matrix for each Debtor, (ii) file a consolidated list of the 30 largest unsecured creditor and (iii) redact certain information from such lists, and approving the form and manner of notice of commencement. In support of the requested relief, the Debtors rely on the *Declaration of Robert A. Del Genio, Chief Restructuring Officer of Voyager Aviation Holdings, LLC, in Support of Chapter 11 Petitions and First Day Motions* (the “First Day Declaration”), which is being filed contemporaneously herewith and is incorporated herein by reference, and respectfully state as follows.³

Background

1. On the date hereof (the “Petition Date”), each Debtor commenced a case under chapter 11 of the Bankruptcy Code by filing a voluntary petition for relief in this Court (the “Chapter 11 Cases”). The Debtors have requested the joint administration of their chapter 11 cases.

2. The Debtors are authorized to continue operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these cases, and no committees have yet been appointed or designated.

³ Capitalized terms used but not defined in this Motion shall have the meanings given to such terms in the First Day Declaration.

3. The Debtors, together with their non-Debtor affiliates (collectively, the “Company”), are a privately owned aviation investor and full-service global aircraft leasing platform operating in the highly competitive multinational aircraft leasing industry. The Company’s main leasing operations are led out of Dublin, Ireland, and the Company has corporate offices in Stamford, CT. It currently has a small team of 13 full-time employees split between Europe and the U.S. As of the Petition Date, the Company owned 18 aircraft, most of which are widebody aircraft and 16 of which are currently on lease to 7 airline customers.

4. As further described in the First Day Declaration, the Debtors have commenced these chapter 11 cases to consummate a sale of substantially all of the Company’s assets (the “Azorra Transaction”) to Azorra Explorer Holdings Limited (the “Purchaser”). The Azorra Transaction is the culmination of months of strategic planning and negotiations, including evaluating various alternatives, extensively marketing the Company’s assets, and heavily negotiating transaction terms. The Debtors have entered into a restructuring support agreement with respect to a prearranged chapter 11 plan (the “Plan”).

5. After years of managing difficult headwinds, the Azorra Transaction and the Plan together provide the best opportunity for the Company to maximize value for creditors across its capital structure.

6. Further information regarding the Debtors’ business, capital structure, the circumstances leading to the commencement of the Chapter 11 Cases, and the facts and circumstances supporting the relief requested in this Motion is set forth in the First Day Declaration.

Relief Requested

7. The Debtors seek entry of an order authorizing them to (a) maintain a consolidated list of creditors (the “Consolidated Mailing Matrix”) in lieu of a separate mailing matrix for each Debtor, (b) file a consolidated list of the Debtors’ thirty largest unsecured creditors (the “Top 30 List”) in lieu of filing a list of twenty largest unsecured creditors for each Debtor, (c) redact certain personal information from each such list and (d) approving the form and manner of notifying creditors of the commencement of these Chapter 11 Cases. A proposed form of Order is attached to this Motion as **Exhibit A**.

8. The statutory bases for the relief requested herein are sections 105(a), 107(c), 342(a) and 521 of the Bankruptcy Code, rules 1007, 2002, and 9013-1 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 1007-1, 5075-1, and 9013-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”).

Jurisdiction and Venue

9. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012. The Debtors confirm their consent, pursuant to Bankruptcy Rule 7008, to the entry of a final order by this Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

10. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Basis for Relief

I. Cause Exists to Authorize the Debtors to File a Consolidated List of Creditors in Lieu of Filing a Separate Mailing Matrix for Each Debtor.

11. Section 521(a) of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1), and Local Rule 1007-1(a) require a debtor in a voluntary chapter 11 case to file a list containing the name and complete address of each creditor. In addition, Bankruptcy Rule 1007(d) requires a debtor to file a list containing the name, address, and claim of the creditors holding the twenty largest unsecured claims against the debtor.

12. Permitting the Debtors to maintain a single Consolidated Mailing Matrix in electronic format only, in lieu of maintaining a separate creditor matrix for each Debtor is warranted under the circumstances of these cases. Because the Debtors have numerous creditors and other parties in interest, requiring them to segregate and convert their consolidated computerized records to Debtor-specific matrices would be unnecessarily burdensome and would greatly increase the risk of error with respect to information already on computer systems maintained by the Debtors or their agents. It would also likely result in duplicate mailings.⁴

13. The Debtors are prepared to make the consolidated creditor list available in electronic form to any party in interest who so requests (or in non-electronic form at such requesting party's sole cost and expense) in lieu of submitting a mailing matrix to the clerk of this Court. The Debtors submit that the proposed maintenance of the Creditor Matrix with the Proposed Claims and Noticing Agent (defined below) is consistent with applicable Local Rules. Pursuant to Local Rule 5075-1, a debtor filing a petition with more than 250 creditors and equity

⁴ If any of the Chapter 11 Cases is converted to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor will, from that time on, maintain its own creditor mailing matrix.

interest holders, in the aggregate, as is the case here, is required to retain an approved claims and noticing agent pursuant to an order of this Court.

14. The Court has granted similar relief to the relief requested herein with respect to preparation of a consolidated list of creditors. *See, e.g., In re SVB Financial Group*, Case No. 23-10367 (MG) (Bankr. S.D.N.Y. March 22, 2023) [ECF No. 55]; *In re Times Square JV LLC*, Case No. 22-11715 (JPM) (Bankr. S.D.N.Y. Dec. 30, 2022) [ECF No. 33]; *In re Lumileds Holding B.V.*, Case No. 22-11155 (LGB) (Bankr. S.D.N.Y. Aug. 31, 2022) [ECF No. 67]; *In re Revlon, Inc.*, Case No. 22-10760 (DJS) (Bankr. S.D.N.Y. June 17, 2022) [ECF No. 75]; *In re MatlinPatterson Glob. Opportunities Partners II L.P.*, Case No. 21-11255 (DSJ) (Bankr. S.D.N.Y. July 9, 2021) [ECF No. 30]; *In re GTT Comm'ns, Inc.*, Case No. 21-11880 (MEW) (Bankr. S.D.N.Y. Nov. 4, 2021) [ECF No. 67].

II. The Court Should Authorize the Debtors to File a Single Consolidated List of the Debtors' Thirty Largest Unsecured Creditors.

15. Bankruptcy Rule 1007(d) provides that a debtor shall file “a list containing the name, address and claim of the creditors that hold the twenty largest unsecured claims, excluding insiders.” This list is primarily used by the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”) to identify potential candidates to serve on an official committee of unsecured creditors appointed pursuant to section 1102 of the Bankruptcy Code.

16. The Debtors request authority to file a single, consolidated Top 30 List instead.⁵ Because the Debtors' largest twenty unsecured creditors are likely to overlap, and because certain Debtors may have fewer than twenty unsecured creditors, the Debtors submit that filing a separate list of the top twenty unsecured creditors for each Debtor would be of limited utility and could

⁵ If any of the Chapter 11 Cases is converted to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor will file its own list of twenty largest unsecured creditors within ten (10) days of conversion.

consume an excessive amount of the Debtors' limited time and resources. Further, the Debtors believe that a single, consolidated Top 30 List will aid the U.S. Trustee in its efforts to communicate with creditors.

17. Courts in this district have routinely granted similar relief to the relief requested herein with respect to filing a single consolidated list of the largest unsecured creditors of a debtor and its debtor affiliates. *See, e.g., In re SVB Financial Group*, Case No. 23-10367 (MG) (Bankr. S.D.N.Y. March 22, 2023) [ECF No. 55]; *In re Times Square JV LLC*, Case No. 22-11715 (JPM) (Bankr. S.D.N.Y. Dec. 30, 2022) [ECF No. 33]; *In re Lumileds Holding B.V.*, Case No. 22-11155 (LGB) (Bankr. S.D.N.Y. Aug. 31, 2022) [ECF No. 67]; *In re Revlon, Inc.*, Case No. 22-10760 (DJS) (Bankr. S.D.N.Y. June 17, 2022) [ECF No. 75]; *In re MatlinPatterson Glob. Opportunities Partners II L.P.*, Case No. 21-11255 (DSJ) (Bankr. S.D.N.Y. July 9, 2021) [ECF No. 30]; *In re LATAM Airlines Grp. S.A.*, Case No. 20-11254 (JLG) (Bankr. S.D.N.Y. May 29, 2020) [ECF No. 58].

18. Accordingly, the Debtors submit that filing a consolidated Top 30 List will assist the efficient administration of these cases and serve the interests of justice.

III. Cause Exists to Redact Certain Personal Information of Individual Creditors and Interest Holders.

19. Section 107(c)(1) of the Bankruptcy Code provides that the Court:

for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual:

- (a) Any means of identification contained in a paper filed, or to be filed in a case under the Bankruptcy Code.
- (b) Other information contained in a paper described in subparagraph (a).

11 U.S.C. § 107(c)(1).

20. The Debtors respectfully submit that it is appropriate to authorize them to redact from any list to be filed with the Court in these cases, including the Consolidated Mailing Matrix, the home addresses of individual creditors and interest holders because such information could be used to perpetrate identity theft or locate survivors of domestic violence, harassment, or stalking. The home addresses of individuals can be used to steal individual creditors' identities, to harass or stalk them, to locate survivors of domestic violence, and perpetrate phishing scams. This risk is real. In one recent case, a chapter 11 debtor's employee was forced to move after the employee's abusive ex-partner used unredacted bankruptcy schedules to track that employee to a new home address. *See* Decl. of Alvaro Bellon ¶ 7, *In re Charming Charlie Holdings Inc.*, Case No. 19-11534 (Bankr. D. Del. July 11, 2019). In another case, the customers of a cryptocurrency company received phishing emails purporting to be from the Debtors' legal advisors. *See In re Celsius Network LLC*, Case No. 22-10964 (MG) (Bankr. S.D.N.Y. Nov. 30, 2022).

21. In these cases, the risk of identity theft, injury to innocent individual creditors, or legally imposed privacy protections under applicable jurisdictions outweighs the presumption in favor of public access to judicial records and papers. *See United States v. Cont'l Air Lines, Inc. (In re Cont'l Airlines)*, 150 B.R. 334, 341 (D. Del. 1993). On the one side of the balance, there is minimal benefit (if any) to public disclosure of the individuals' personal home addresses and the names of European individuals. Employees are unlikely to be significant participants in these cases, so long as the Debtors obtain authority (as they have requested) to pay all outstanding wages and to continue employee benefits. The Debtors will, through their Proposed Claims and Noticing Agent, make any required notices to individual creditors, and any official committee will be at liberty to communicate with them as well. Public disclosure could also expose the Debtors to

substantial penalties and could put individual creditors at risk of identity theft or harassment, simply for doing business with a company in chapter 11.

22. The Debtors respectfully submit that cause exists to authorize the Debtors to redact from any paper filed or to be filed with the Court in these Chapter 11 Cases, including the Consolidated Creditor Matrix, the home addresses of individual creditors—including the Debtors' employees, debtholders, and equity holders. Such information is sensitive and could be used to perpetrate identity theft or to locate survivors of domestic violence, harassment, or stalking.

23. Debtors propose to provide, on a confidential basis, an unredacted version of the Consolidated Mailing Matrix and any other document redacted pursuant to the proposed order to (i) the Court, (ii) the U.S. Trustee, (iii) counsel to any statutory committee appointed in the Chapter 11 Cases (if any), and (iv) any party in interest upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to the Chapter 11 Cases. In each case, this would be subject to a review of whether such disclosure, on a case-by-case basis, would violate any obligation under any privacy or data protection law or regulation. In addition, the Debtors will distribute to their current employees any notices that are received at the Debtors' corporate headquarters and are intended for such employee.

24. Courts in this jurisdiction have granted similar relief in comparable chapter 11 cases. *See, e.g., In re Voyager Digital Holdings, Inc., et al.*, No. 22-10943 (MEW) (Bankr. S.D.N.Y. July 8, 2022) [ECF No. 54] (authorizing the debtors to redact home addresses of individuals listed on the creditor matrix or other documents filed with the court and names); *In re Vewd Software USA, LLC*, No. 21-12065 (MEW) (Bankr. S.D.N.Y. Dec. 17, 2021) [ECF No. 40] (same); *In re GTT Commc'ns. Inc.*, No. 21-11880 (MEW) (Bankr. S.D.N.Y. Nov. 4, 2021) [ECF No. 67] (authorizing the debtors to redact personally identifiable information, including home

addresses and personal e-mail addresses, of individuals listed on the creditor matrix or other documents filed with the court); *In re Grupo Posadas S.A.B. de C.V.*, No. 21-11831 (SHL) (Bankr. S.D.N.Y. Oct. 27, 2021) [ECF No. 32] (authorizing the debtors to redact personally identifiable information, including home addresses and personal e-mail addresses, of individuals listed on the creditor matrix or other documents filed with the court); *In re MatlinPatterson Glob. Opportunities Partners II L.P.*, No. 21-11255 (DSJ) (Bankr. S.D.N.Y. July 9, 2021) [ECF No. 30] (authorizing the debtors to redact personally identifiable information, including home addresses, of individual creditors listed on any document filed with the court and certain limited partners listed on the corporate ownership statement); *In re Automotores Gildemeister SpA*, No. 21-10685 (LGB) (Bankr. S.D.N.Y. Apr. 15, 2021) [ECF No. 44] (authorizing the debtors to redact the home addresses of individuals listed on the consolidated creditors list or other documents filed with the court).

IV. The Court Should Authorize KCC to Mail Required Noticed to Creditors.

25. Bankruptcy Rule 2002(a)(1) provides that the clerk (or other person directed by the Court) must give the debtor, the U.S. Trustee, all creditors, and any indenture trustee at least 21 days' notice by mail of the meeting of creditors under section 341 of the Bankruptcy Code. Bankruptcy Rule 2002(f)(1) further provides that notice of "the order for relief" shall be sent by mail to all creditors.

26. Kurtzman Carson Consultants LLC ("KCC," or the "Proposed Claims and Noticing Agent"), will undertake all mailings directed by the Court or the U.S. Trustee, or as required by Bankruptcy Rules 2002 (a) and (f), including the notice of commencement of the Chapter 11 Cases, substantially in the form attached as Exhibit 1 to the Order attached as Exhibit A hereto. The Debtors believe that using KCC to promptly provide notices to all applicable parties will maximize

efficiency in administering the Chapter 11 Cases and will ease administrative burdens that would otherwise fall upon the Court and the U.S. Trustee. Additionally, KCC will assist the Debtors in preparing creditor lists and mailing initial notices, and therefore there are efficiencies in authorizing KCC to mail the notice of commencement of the Chapter 11 Cases. Accordingly, the Debtors respectfully submit that KCC should undertake such mailings.

Motion Practice

27. This Motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated and a discussion of their application to this Motion. Accordingly, the Debtors submit that this Motion satisfies Local Bankruptcy Rule 9013-1(a).

Notice

28. The Debtors will provide notice of this Motion to (a) the Office of the United States Trustee for the Southern District of New York; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) counsel to the Required Consenting Noteholders, Clifford Chance US LLP; (d) counsel to the Aircraft Facility Lenders; (e) counsel to the Indenture Trustee of the Secured Notes; (f) counsel to the Purchaser, Paul, Weiss, Rifkind, Wharton & Garrison LLP and Pillsbury Winthrop Shaw Pittman LLP; (g) the Securities and Exchange Commission; (h) the Internal Revenue Service; (i) the Office of Foreign Assets Control of the United States Department of Treasury; (j) the United States Attorney's Office for the Southern District of New York; (k) the office of the attorneys general for the states in which the Debtors operate; and (l) any party that has requested notice pursuant to Bankruptcy Rule 2002 (collectively, the "Notice Parties"). The Debtors respectfully submit that, in view of the facts and circumstances, such notice is sufficient, and no other or further notice need be provided.

No Previous Request

29. No prior request for the relief sought in this Motion has been made to this or any other court.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Court (i) enter the Order, substantially in the form attached hereto as **Exhibit A**, and (ii) grant such other relief as is just and proper.

Dated: July 27, 2023
New York, New York

/s/ Lauren C. Doyle

Samuel A. Khalil, Esq.
Lauren C. Doyle, Esq.
Edward R. Linden, Esq.
Brian Kinney, Esq.

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/s/ Michael J. Edelman

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Proposed Counsel to the Participation Debtors

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
Voyager Aviation Holdings, LLC <i>et al.</i> ,)	Case No. 23-11177 (JPM)
)	
Debtors. ¹)	(Joint Administration Pending)

ORDER (I) AUTHORIZING THE DEBTORS TO (A) PREPARE AND MAINTAIN CONSOLIDATED LIST OF CREDITORS IN LIEU OF SUBMITTING 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

Upon the motion (the “Motion”)² of the debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned cases for entry of an order (i) authorizing the Debtors to (a) maintain a Consolidated Mailing Matrix, (b) file a consolidated Top 30 List, and (c) redact certain personally identifying information, and (ii) approving the form and manner of notice of commencement, all as more fully set forth in the Motion; and the Court having reviewed the

¹ 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 XI 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.

² Capitalized terms used but not defined in this Order shall have the meanings given to such terms in the Motion or in the First Day Declaration, as applicable.

Motion and the First Day Declaration and having heard the statements of counsel regarding the relief requested in the Motion at a hearing before the Court, if any (the “Hearing”); and the Court having found that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); (b) this is a core proceeding pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b); (c) venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and (d) due and proper notice of the Motion and the Hearing was sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. In lieu of submitting a formatted mailing matrix, the Debtors, with the assistance of the Proposed Claims and Noticing Agent (upon the Court’s approval of the Debtors’ retention of the Proposed Claims and Noticing Agent), shall maintain and make available a single Consolidated Mailing Matrix of all of the Debtors’ creditors in electronic form to any entity who so requests and in non-electronic form at such requesting entity’s sole cost and expense; *provided* that if any of the Chapter 11 Cases is converted to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall maintain its own creditor mailing matrix.
3. The Debtors are authorized to file a consolidated Top 30 List in lieu of each Debtor’s list of its twenty largest unsecured creditors; *provided* that if any of the Chapter 11 Cases is converted to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file its own list of twenty largest unsecured creditors.

4. The Debtors are authorized to redact on the Consolidated Mailing Matrix and any other document filed with the Court the home addresses of individuals, *provided, however*, that the Debtors shall provide, on a confidential basis, an unredacted version of the Consolidated Mailing Matrix and any other filings redacted pursuant to this Order to (i) the Court, (ii) the U.S. Trustee, (iii) counsel to the official committee of unsecured creditors if one is appointed in the Chapter 11 Cases, and (iv) any party in interest upon a request to the Debtors (email being sufficient) or to the Court that is reasonably related to the Chapter 11 Cases. In each case, this would be subject to a review of whether such disclosure, on a case-by-case basis, would violate any obligation under any privacy or data protection law or regulation. Each party receiving an unredacted copy of the Consolidated Mailing Matrix or any other applicable document shall keep such redacted information confidential unless required to be disclosed by law or court order. The Proposed Claims and Noticing Agent will serve as the conduit by which communications to individuals are transmitted.

5. The notice of commencement of the Chapter 11 Cases, substantially in the form attached to this Order as **Exhibit 1**, is hereby approved.

6. Under the circumstances of the Chapter 11 Cases, notice of the Motion is adequate under Bankruptcy Rule 6004(a).

7. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective and enforceable immediately upon entry.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

9. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2023
New York, New York

HONORABLE JOHN P. MASTANDO III
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Notice of Commencement

Information to identify the case:

Debtor: Voyager Aviation Holdings, LLC EIN: 45-3908601
Name

United States Bankruptcy Court for the: Southern District of New York Date Case Filed for chapter 11: July 27, 2023
(State) MM / DD / YYYY

Case number: 23-11177 (JPM)

Official Form 309F1 (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. For individuals located in the European Union, please note that your name may be publicly disclosed in connection with these cases.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor's full name See chart below.

No.	Debtor	Other Names Used In the Last 8 Years	Address	Case No.	EIN #
1.	Voyager Aviation Holdings, LLC	Intrepid Aviation Group Holdings, LLC	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11177 (JPM)	45-3908601
2.	A330 MSN 1432 Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11178 (JPM)	N/A
3.	A330 MSN 1579 Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11179 (JPM)	N/A
4.	Aetios Aviation Leasing 1 Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11187 (JPM)	N/A
5.	Aetios Aviation Leasing 2 Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11190 (JPM)	N/A
6.	Cayenne Aviation LLC	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11191 (JPM)	35-2509861

No.	Debtor	Other Names Used In the Last 8 Years	Address	Case No.	EIN #
7.	Cayenne Aviation MSN 1123 Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11181 (JPM)	N/A
8.	Cayenne Aviation MSN 1135 Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11183 (JPM)	N/A
9.	DPM Investment LLC	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11193 (JPM)	83-2955087
10.	Intrepid Aviation Leasing, LLC	N/A	301 Tresser Boulevard Suite 602 S Stamford, Connecticut 06901	23-11196 (JPM)	N/A
11.	N116NT Trust	N/A	301 Tresser Boulevard Suite 602 S Stamford, Connecticut 06901	23-11188 (JPM)	N/A
12.	Panamera Aviation Leasing IV Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11185 (JPM)	N/A
13.	Panamera Aviation Leasing VI Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11186 (JPM)	N/A
14.	Panamera Aviation Leasing XI Limited	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11189 (JPM)	N/A
15.	Panamera Aviation Leasing XII Designated Activity Company	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11180 (JPM)	N/A
16.	Panamera Aviation Leasing XIII Designated Activity Company	N/A	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11184 (JPM)	N/A
17.	Voyager Aircraft Leasing, LLC	Intrepid Aircraft Leasing, LLC	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11197 (JPM)	32-0442925
18.	Voyager Aviation Aircraft Leasing, LLC	Intrepid Aviation Group, LLC	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11195 (JPM)	20-5163865
19.	Voyager Aviation Management Ireland Designated Activity Company	Intrepid Aviation Management Ireland Limited	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11176 (JPM)	N/A
20.	Voyager Finance Co.	Intrepid Finance Co.	301 Tresser Boulevard Suite 602 Stamford, Connecticut 06901	23-11194 (JPM)	61-1729652

2. **All other names used in the last 8 years** See chart above.

3. **Address** See chart above.

<p>4. Debtor's attorney Name and address</p>	<p>Samuel A. Khalil, Esq. Lauren C. Doyle, Esq. Brian Kinney, Esq. Edward R. Linden, Esq. Milbank LLP 55 Hudson Yards New York, New York 10001 Telephone: (212) 530-5000 Facsimile: (212) 530-5219</p>	<p>Cameron A. Gee Michael J. Edelman Justine L. Chivers William W. Thorsness Vedder Price LLP 1633 Broadway, 31st Floor New York, New York 10019 Telephone: (212) 407-7700 Facsimile: (212) 407-7799</p>
<p>5. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at https://pacer.uscourts.gov.</p>	<p>U.S. Bankruptcy Court Southern District of New York One Bowling Green New York, New York 1000</p>	<p>Hours open <u>8:30 a.m. to 5:00 p.m. (prevailing Eastern Time)</u> Contact phone (212) 668-2870</p>
<p>6. Meeting of creditors The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.</p>	<p><u>August 1, 2023</u> at <u>To Be Determined</u> Date Time The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.</p>	<p>Location: <u>Dial-in Number:</u> 866-910-1611 <u>Passcode:</u> 3962332#</p>

7. Proof of claim deadline **Deadline for filing proof of claim: Not yet set. If a deadline is set, the court will send you another notice.**

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

- your claim is designated as *disputed*, *contingent*, or *unliquidated*;
- you file a proof of claim in a different amount; or
- you receive another notice.

If your claim is not scheduled or if your claim is designated as *disputed*, *contingent*, or *unliquidated*, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

8. Exception to discharge deadline

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.

Deadline for filing the complaint: Not yet set. If a deadline is set, the court will send you another notice.

9. Creditors with a foreign address

If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

10. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.

11. Discharge of debts

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.