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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)	(Jointly Administered)	
)		

**NOTICE OF FINAL HEARING ON FIRST DAY PLEADINGS TO
 BE HELD ON AUGUST 24, 2023 AT 11:00 AM (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that on July 27, 2023 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) each commenced a case

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.



by filing a petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).³

PLEASE TAKE FURTHER NOTICE that the following pleadings (the “Second Day Pleadings”) will be heard on a final basis at a hearing before the Honorable Judge John P. Mastando III scheduled for August 24, 2023 at 11:00 am, prevailing Eastern Time (the “Second Day Hearing”), or at such other time as the Court may determine:

1. **Cash Collateral Motion.** *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. 3]
2. **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]
3. **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]
4. **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]
5. **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]
6. **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]
7. **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*

³ Capitalized terms not defined herein shall have the meaning ascribed to them in the *Declaration of Robert A. Del Genio, Chief Restructuring Officer of Voyager Aviation Holdings, LLC, in Support of Chapter 11 Petitions and First Day Pleadings.*

Compensation and Benefits Programs, and (II) Granting Related Relief
[Docket No. 11]

8. **Notice and Case Management Motion.** *Debtors' Motion Seeking Entry of an Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Docket No. 15]

PLEASE TAKE FURTHER NOTICE that the Second Day Hearing will be conducted in-person at One Bowling Green, New York, New York 10004, Room 501. Parties wishing to appear at the Second Day Hearing, whether making a “in person,” “live,” or “listen only” appearance before the Court, must make an electronic appearance through the Court’s website at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Appearances must be entered no later than August 23, 2023 at 4:00 p.m., prevailing Eastern Time (the “Appearance Deadline”). Following the Appearance Deadline, parties who have made their electronic appearance through the Court’s website to appear via Zoom for Government will receive an invitation from the Court with the Zoom link that will allow them to attend the Second Day Hearing. Parties wishing to appear at the Second 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 <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that copies of the Second Day Pleadings and other pleadings, can be viewed and/or obtained by: (i) accessing the Courts’ website at www.nysb.uscourts.gov, or (ii) on the website of the Debtors’ claims and noticing agent, Kurtzman Carson Consultants LLC (“KCC”), at www.kccllc.net/voyageraviation or by contacting KCC directly at (877) 634-7163 (for callers within the United States and Canada) or +1 (424) 236-7219 (for international callers).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions (i) must be in writing, (ii) must conform to the Federal Rules of Bankruptcy Procedure (the

“Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York (the “Local Rules”), (iii) must set forth the name of the objecting party, the nature and amount of claims or interests held or asserted by the objecting party against the Debtors’ estate or property, the basis for the objection and the specific grounds therefor, (iv) must be filed with the Bankruptcy Court electronically on the docket of *In re Voyager Aviation Holdings, LLC*, Case No. 23-11177 (JPM) and in accordance with General Order M-399 (General Order M-399 and the User’s Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court), and (v) must be served upon: (a) proposed counsel to the Debtors and Debtors in Possession other than the Participation Debtors, Milbank LLP, 55 Hudson Yards, New York, NY 10001, Attn: Lauren C. Doyle and Brian Kinney; (b) proposed counsel to the Participation Debtors, Vedder Price P.C., 1633 Broadway, 31st Floor, New York, New York 10019 Attn: Michael J. Edelman and (c) the Office of the United States Trustee for the Southern District of New York so as to be received no later than **August 17, 2023 at 4:00 p.m., prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that *your rights may be affected.* You should read the First Day Pleadings carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult with one.

PLEASE TAKE FURTHER NOTICE that the Second Day Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Second Day Hearing or at a later hearing. The Debtors will file an agenda before the Second Day Hearing, which may modify or supplement the motions to be heard at the Second Day Hearing.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the relief requested in the First Day Pleadings, or if you want the Bankruptcy Court to

consider your view on the First Day Pleadings, then you or your attorney must attend the Second Day Hearing. If you or your attorney do not take these steps, the Bankruptcy 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 with no further notice or opportunity to be heard.

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Dated: August 2, 2023
New York, New York

/s/ Lauren C. Doyle

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