IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
AVENGER FLIGHT GROUP, LLC, *et al.*[1]	)	Case No. 26-10183 (MFW)
Debtors.	)	(Jointly Administered)
	)	**Re: Docket No. 195**

ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF WILLKIE FARR & GALLAGHER LLP AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF FEBRUARY 26, 2026

Upon the application (the "Application")[2] of the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases for entry of an order (this "Order") authorizing the Committee to retain and employ Willkie Farr & Gallagher LLP ("Willkie") as its co-counsel effective as of February 26, 2026, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014(a), and Local Rule 2014-1; and upon the (a) *Declaration of Brett H. Miller in Support of the Application for Entry of an Order Authorizing the Retention and Employment of Willkie Farr & Gallagher LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of February 26, 2026* (the "Miller Declaration"), attached to the Application as **Exhibit B**, and (b) *Declaration of Philip Adrian in Support of the Application for Entry of an Order Authorizing the Retention and Employment of Willkie Farr &*

[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] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

Gallagher LLP as Co-Counsel to the Official Committee of Unsecured Creditors Effective as of February 26, 2026 (the "Adrian Declaration"), attached to the Application as **Exhibit C**; and this Court having jurisdiction pursuant to sections 157 and 1334 of title 28 of the United States Code to consider the Application and the relief requested therein; and venue being proper in this Court pursuant to sections 1408 and 1409 of title 28 of the United States Code; and this Court being satisfied that notice of the Application and the opportunity for a hearing on the Application was appropriate under the particular circumstances and no further or other notice need be given; and this Court being satisfied, based on the representations made in the Application and the Miller Declaration, that Willkie does not represent or hold any interest adverse to the Committee in connection with the Chapter 11 Cases, and that Willkie is a "disinterested person," as such term is defined in section 101(14) of the Bankruptcy Code; and this Court having determined that the legal and factual bases set forth in the Application, the Miller Declaration, and the Adrian Declaration establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Application is GRANTED as set forth herein.

2. Pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014(a), and Local Bankruptcy Rule 2014-1, the Committee is authorized to retain and employ Willkie as its co-counsel, effective as of February 26, 2026, on the terms and conditions set forth in the Application and the Miller Declaration.

3. Willkie shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Rules, and any other applicable procedures and orders of this Court. Willkie also intends

to make reasonable efforts to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines, both in connection with the Application and any interim and final fee application(s) filed by Willkie in the Chapter 11 Cases.

4. Prior to any increases in Willkie's hourly rates set forth in the Application, Willkie shall provide ten (10) days' notice to the Debtors, the U.S. Trustee, and the Committee, which notice shall explain the basis for the requested rate increases in accordance with section 330(a)(3)(F) of the Bankruptcy Code. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including, but not limited to, the reasonableness standard provided for in section 330 of the Bankruptcy Code.

5. The Committee and Willkie are authorized to take all actions they deem necessary and appropriate to effectuate the relief granted pursuant to this Order.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. This Court shall retain jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.

Dated: April 10th, 2026
Wilmington, Delaware

MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE