UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AVENGER FLIGHT GROUP, LLC, *et al.*,	Case No. 26-10183 (MFW)
Debtors.[1]	(Jointly Administered)
	Ref. Dkt. Nos. 383 & 384

MOTION OF DEBTORS FOR ENTRY OF AN ORDER SHORTENING NOTICE AND SCHEDULING HEARING ON MOTION OF DEBTORS FOR AN ORDER APPROVING THE SALE OF THE MEDELLIN SIMULATORS FREE AND CLEAR OF ALL ENCUMBRANCES

The above-captioned debtors and debtors in possession (collectively, the "Debtors" respectfully state as follows in support of this motion (the "Motion"):

Relief Requested

1. By this Motion, the Debtors respectfully request entry of an order (the "Proposed Order"), substantially in the form attached hereto as **Exhibit A**: (a) shortening notice on the *Motion of Debtors for an Order Approving the Sale of the Medellin Simulators Free and Clear of All Encumbrances* (the "Sale Motion");[2] (b) setting a hearing to consider the Sale Motion before the United States Bankruptcy Court for the District of Delaware (the "Court") at the hearing currently scheduled on **May 13, 2026 at 3:00 p.m. (prevailing Eastern Time)**; (c) setting an

[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 used but not defined herein shall have the meanings ascribed to them in the Sale Motion.

objection deadline with respect to the relief requested in the Sale Motion; and (d) granting related relief.

Jurisdiction and Venue

2. The United States District Court for the District of Delaware has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Debtors confirm their consent, pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion.

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

4. The statutory bases for the relief requested herein are section 105(a) of the United States Code (the "Bankruptcy Code"), Rules 1001, 2002, 6004, and 9007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2002-1, 6004-1, and 9006-1.

Background

5. On February 11, 2026 or February 12, 2026, as applicable (collectively, the "Petition Date"), each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On February 25, 2026, the United States Trustee for the District of Delaware appointed an official committee of unsecured creditors ("Committee"). No request for the appointment of a trustee or examiner has been made in these chapter 11 cases.

7. On March 11, 2026, the Court entered the *Final Order (I) Authorizing the Debtors to Obtain Senior Secured Postpetition Financing, (II) Authorizing the Debtors to Use Cash*

Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 160] (the "Final DIP Order").

8. Among other things, the Final DIP Order memorialized the resolution of issues raised by secured party Export Development Canada ("EDC"), the terms of which are defined as the "EDC Resolution" in the Final DIP Order [Final DIP Order, ¶ 63]. As part of such agreement, the Debtors are required to work with EDC to facilitate a sale of certain of EDC's collateral, including the Medellin Assets. The Debtors also agreed to maintain insurance on the Medellin Assets and pay rent for the Columbian facility where such assets are housed, but only through May 31, 2026.

9. As further described in the Sale Motion, the terms of a private sale of the Medellin Assets have now been agreed to. The Debtors, EDC and the Buyer have worked cooperatively to facilitate the closing on an expedited basis as contemplated by the Final DIP Order. Accordingly, the Debtors have filed the Sale Motion seeking to approve the sale of the Medellin Assets to facilitate the closing of such sale on or before May 31, 2026.

10. The Debtors have collaboratively worked with EDC to continue the momentum to effectuate a sale and maintain the value of the Medellin Assets in the interim. The Debtors therefore request a hearing on shortened notice in order to effectuate the sale of the Medellin Assets prior to May 31, 2026. The Debtors already have a hearing date in these cases currently scheduled on **May 13, 2026 at 3:00 p.m. (prevailing Eastern Time).**

11. The DIP Lenders and Prepetition Term Loan Lenders consent to the sale of the Medellin Assets and to the scheduling of a hearing on the Sale Motion on shortened notice.

Basis for Relief

Shortened Notice of the Sale Motion is Appropriate

12. Local Rule 9006-1 provides that, unless the Bankruptcy Rules or the Local Rules state otherwise, "all motion papers must be filed and served in accordance with Local Rule 2002-1(b) at least 14 days prior to the hearing date." Del. Bankr. L.R. 9006-1(c)(i).

13. Local Rule 9006-1 further provides, in pertinent part, that "[n]o motion will be scheduled on less notice than required by these Local Rules or the Fed. R. Bankr. P. except by order of the Court, on written motion (served on all interested parties) specifying the exigencies justifying shortened notice." Del. Bankr. L.R. 9006-1(e).

14. Bankruptcy Rule 9006 authorizes the Court, for cause shown, to reduce notice periods for motions and to do so on an *ex parte* basis. *See* Fed. R. Bankr. P. 9006(c)(1) ("When a rule, notice given under a rule, or court order requires or allows an act to be done within a specified time, the court may—for cause and with or without a motion or notice—reduce the time."); *see also In re Chateaugay Corp.*, 111 B.R. 399, 407–08 (S.D.N.Y. 1990) (affirming the bankruptcy court's decision to shorten a notice period where there was no prejudice to the non-moving party and where cause was shown).

15. The exigencies justify shortening notice of the Sale Motion. Without shortened notice as requested herein, the sale may not be approved prior to the date that insurance and facility rent paid for by the Debtors to maintain the Medellin Assets expires. Indeed, failure to close the sale of the Medellin Assets prior to May 31, 2026 as planned increases the risk of insecurity of the Medellin Assets, the result of which would negatively impact the sale to the Buyer. In addition, if the sale does not timely close, then there will be no partial payoff of EDC's claims against the Debtors. Thus, the requested shortened notice is necessary to avoid prejudice to the Debtors, their estates, creditors, and stakeholders.

16. Interested parties will receive notice of the Sale Motion, and a copy of the Sale Motion will be available on the Debtors' case website at https://www.veritaglobal.net/avengerfg.

17. Accordingly, shortening notice for the Sale Motion will not unduly prejudice any parties in interest.

18. For these reasons, the Debtors assert that compelling circumstances exist and respectfully request that the Court shorten notice of the Sale Motion to have it heard at the omnibus hearing scheduled for **May 13, 2026 at 3:00 p.m. (prevailing Eastern Time)**. The Debtors also request that parties may submit objections to Sale Motion at or before the Hearing.

Compliance with Local Rule 9006-1(e)

19. Before filing this Motion, counsel to the Debtors notified the U.S. Trustee and counsel to the Committee of the Debtors' intention to seek shortened notice with respect to the Sale Motion. The Debtors did not receive a response from the U.S. Trustee prior to filing the Motion. The Debtors understand the Committee does not object to shortened notice.

Notice

20. Notice of this Motion will be given to the following parties, or their counsel, if known: (a) U.S. Trustee; (b) counsel to the Committee; (c) counsel to the Prepetition Lenders; (d) counsel to the Prepetition Agent; (e) EDC; and (f) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given. This Motion is also available on the Debtors' case website and will be served on the above parties by electronic mail or overnight delivery. In light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

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

WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as is just and proper.

Dated: May 5, 2026

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

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Counsel to the Debtors and Debtors in Possession

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AVENGER FLIGHT GROUP, LLC, *et al.*,	Case No. 26-10183 (MFW)
Debtors.[3]	(Jointly Administered)
	Related Docket No. ___

ORDER SHORTENING NOTICE AND SCHEDULING HEARING ON MOTION OF DEBTORS FOR AN ORDER APPROVING THE SALE OF THE MEDELLIN SIMULATORS FREE AND CLEAR OF ALL ENCUMBRANCES

Upon consideration of the motion (the "Motion to Shorten")[4] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order (this "Order"): (a) shortening notice on the *Motion of Debtors for an Order Approving the Sale of the Medellin Simulators Free and Clear of All Encumbrances* [Docket No. 383] (the "Sale Motion"); (b) setting a hearing to consider the Sale Motion; (c) setting an objection deadline with respect to the relief requested in the Sale Motion; and (d) granting related relief, all as more fully set forth in the Motion to Shorten; and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157 pursuant to the *Amended Standing Order of Reference* from the United States

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[4] Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion to Shorten.

District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion to Shorten in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion to Shorten is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors' notice of the Motion to Shorten and opportunity for a hearing on the Motion to Shorten were appropriate under the circumstances and no other notice need be provided; and the Court having found cause for the relief requested in the Motion to Shorten pursuant to Local Rule 9006-1(e); and the Court having found that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is GRANTED as set forth herein.

2. The Sale Motion is set for hearing and will be considered by the Court on **May 13, 2026 at 3:00 p.m. (prevailing Eastern Time)**.

3. Any response or objection to the Sale Motion may be presented at or before the Hearing.

4. This Court retains jurisdiction to hear and determine all matters arising from or related to the interpretation, implementation, or enforcement of this Order.