Docket #0594 Date Filed: 08/25/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AF LIQUIDATING, LLC, *et al.*,	Case No. 26-10183 (MFW)
Debtors.[1]	(Jointly Administered)
	Related Docket No. 540

CERTIFICATE OF NO OBJECTION REGARDING MOTION OF THE LITIGATION TRUST FOR ENTRY OF AN ORDER PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(B) (I) FURTHER ENLARGING THE PERIOD WITHIN WHICH THE LITIGATION TRUST MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF

The undersigned counsel to the AF Litigation Trust (the "**Litigation Trust**"), hereby certifies as follows:

On August 10, 2026, the Litigation Trust filed the *Motion of the Litigation Trust for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 9006(b) (I) Further Enlarging the Period Within Which the Litigation Trust May Remove Actions and (II) Granting Related Relief* [Docket No. 540] (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**"). Attached to the Motion was, among other things, a proposed form of order approving the relief requested in the Motion (the "**Proposed Order**").

[1] The Debtors in these Chapter 11 Cases and the last four digits of their respective federal tax identification numbers are: AF Liquidating, LLC (1216); AF Dallas III Liquidating, LLC (5615); AF Dallas IV Liquidating, LLC (5558); AF Dallas Liquidating, LLC (3418); AF EU Operations Liquidating Corp. (9406); AF FLL Liquidating, LLC (6470); AF Latam Holding Liquidating Corp. (6475); AF Latam Sim Holdings II Liquidating, LLC (0473); AF Latam Sim Holdings III Liquidating, LLC (2592); AF Latam Sim Holdings IV Liquidating, LLC (0093); AF Latam Sim Holdings Liquidating, LLC (6475); AF Latam Liquidating, LLC (9545); AF Mexico Liquidating Corp. (1402); AF Orlando Liquidating, LLC (8409); AF Sanford Liquidating, LLC (6661); AF Sim Holding Liquidating Corp. (3325); AF Group Europe Liquidating, Corp. (5908); AF Group Topco Liquidating, LLC (5643); and AF Training Liquidating, LLC (6206). The Debtors' service address is 2800 Valley View Lane, Suite 180, Irving, Texas 75062. Debtor AF Liquidating, LLC was formerly known as Avenger Flight Group, LLC.

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Pursuant to the *Notice of Motion of the Litigation Trust for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 9006(b) (I) Further Enlarging the Period Within Which the Litigation Trust May Remove Actions and (II) Granting Related Relief* filed with the Motion, any objection or response to the relief requested in the Motion was to be filed and served so as to be received by no later than August 24, 2026, at 4:00 p.m. (prevailing Eastern Time) (the "**Objection Deadline**").

As of the date hereof, the undersigned has not received an answer, objection, or other responsive pleading to the Motion. The undersigned further certifies that the Court's docket in these cases reflects that no answer, objection, or other responsive pleading to the Motion has been filed.

WHEREFORE, the Litigation Trust respectfully requests that the Proposed Order granting the relief requested in the Motion, attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: August 25, 2026
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Todd A. Atkinson

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EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
AF LIQUIDATING, LLC, *et al.*,	Case No. 26-10183 (MFW)
Debtors.[1]	(Jointly Administered)
	Related Docket No. 540

ORDER PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9006(b) (I) FURTHER ENLARGING THE PERIOD WITHIN WHICH THE LITIGATION TRUST MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF

Upon consideration of *Motion of the Litigation Trust for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 9006(b) (I) Further Enlarging the Period Within Which the Litigation Trust May Remove Actions and (II) Granting Related Relief* (the "**Motion**")[2] filed by the Litigation Trust; and the Court having reviewed the Motion; and it appearing that proper and adequate notice has been given and that no other or further notice is required; 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 after due deliberation thereon; and sufficient cause therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

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[1] The Debtors in these Chapter 11 Cases and the last four digits of their respective federal tax identification numbers are: AF Liquidating, LLC (1216); AF Dallas III Liquidating, LLC (5615); AF Dallas IV Liquidating, LLC (5558); AF Dallas Liquidating, LLC (3418); AF EU Operations Liquidating Corp. (9406); AF FLL Liquidating, LLC (6470); AF Latam Holding Liquidating Corp. (6475); AF Latam Sim Holdings II Liquidating, LLC (0473); AF Latam Sim Holdings III Liquidating, LLC (2592); AF Latam Sim Holdings IV Liquidating, LLC (0093); AF Latam Sim Holdings Liquidating, LLC (6475); AF Latam Liquidating, LLC (9545); AF Mexico Liquidating Corp. (1402); AF Orlando Liquidating, LLC (8409); AF Sanford Liquidating, LLC (6661); AF Sim Holding Liquidating Corp. (3325); AF Group Europe Liquidating, Corp. (5908); AF Group Topco Liquidating, LLC (5643); and AF Training Liquidating, LLC (6206). The Debtors' service address is 2800 Valley View Lane, Suite 180, Irving, Texas 75062. Debtor AF Liquidating, LLC was formerly known as Avenger Flight Group, LLC.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Pursuant to Bankruptcy Rule 9006, the period within which the Litigation Trust may seek removal of the Civil Actions pursuant to 28 U.S.C. § 1452 and Bankruptcy Rule 9027 is further enlarged through and including **February 6, 2027**.

3. This Order shall be without prejudice to (a) any position the Litigation Trust may take regarding whether section 362 applies to stay any litigation pending against the Debtors, or (b) the Litigation Trust's right to seek a further extension or extensions of the time within which to file notices of removal of actions and related proceedings upon motion filed with the Court.

4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

5. The Litigation Trust is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

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