Docket #0603 Date Filed: 9/14/2026

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)
	Hearing Date: September 16, 2026 at 2:30 p.m. (ET)
	Related Docket Nos. 548, 549, and 550

CERTIFICATION OF COUNSEL REGARDING PROPOSED *OMNIBUS* ORDER APPROVING FINAL FEE APPLICATIONS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

The undersigned hereby certifies as follows:

1. In accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 129], Willkie Farr & Gallagher LLP [Docket No. 548], FTI Consulting, Inc. [Docket No. 549], and Womble Bond Dickinson (US) LLP [Docket No. 550] (collectively, the "**Professionals**") filed their final fee applications (the "**Final Fee Applications**") with the United States Bankruptcy Court for the District of Delaware (the "**Court**").

2. Pursuant to the Final Fee Applications, objections to the Final Fee Applications, if any, were to be filed and served no later than **September 10, 2026 at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**"). The Professionals resolved all received informal responses to the

[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.

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Final Fee Applications, and no objections or responses have been filed on the docket. The hearing to consider the approval of the Final Fee Applications is currently scheduled for **September 16, 2026 at 2:30 p.m. (Eastern Time).**

3. The Official Committee of Unsecured Creditors (the "**Committee**") in the above-captioned cases prepared a proposed form of omnibus order (the "**Proposed Order**") approving the Final Fee Applications. A copy of the Proposed Order is attached hereto as **Exhibit A** with attached **Exhibit 1**, which accurately represents the fees and expenses (including the reflection of any reductions) of the Professionals with respect to the Final Fee Applications. A copy of the Proposed Order has been circulated to each of the Professionals and the United States Trustee, who do not object to its entry.

WHEREFORE, the Committee respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A** without further notice or hearing at the Court's earliest convenience.

Dated: September 14, 2026
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Matthew P. Ward
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Delaware Co-Counsel to the Official Committee of Unsecured Creditors of Avenger Flight Group, LLC, et al.

EXHIBIT A

Proposed *Omnibus* 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 Nos. 548, 549, and 550

***OMNIBUS* ORDER APPROVING FINAL FEE APPLICATIONS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Upon the final fee applications (the "**Final Fee Applications**")[2] of those professionals referenced on **Exhibit 1** annexed hereto (collectively, the "**Professionals**") for entry of an order (the "**Order**"), for allowance of compensation for professional services provided to the Official Committee of Unsecured Creditors (the "**Committee**") and reimbursement of actual and necessary expenses that the Professionals incurred, all as if more fully set forth in the Final Fee Applications; and this Court having 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 District of Delaware, dated February 29, 2012, and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court may enter a final order consistent with Article

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[2] Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Final Fee Applications, as applicable.

III of the United States Constitution; and this Court having found that venue of this proceeding and the Final Fee Applications in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Committee's notice of the Final Fee Applications and opportunity for a hearing on the Final Fee Applications were appropriate and no other notice need be provided; and this Court having reviewed the Final Fee Applications and having heard the statements in support of the relief requested therein at a hearing before this Court, if any, (the "**Hearing**"); and this Court having determined that the requested compensation and expense reimbursement set forth in the Final Fee Applications and at the Hearing, if any, is reasonable, and upon all of the proceedings had before this Court, and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Final Fee Applications are granted on a final basis in the amounts set forth on **Exhibit 1** annexed hereto for services rendered and reimbursement of actual and necessary expenses incurred during the period from February 26, 2026 through July 10, 2026.

2. Notice of each Final Fee Application, as provided therein, shall be deemed good and sufficient notice of such Final Fee Application and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

3. The Debtors and the Litigation Trust, as applicable, are authorized and directed to make payment to each of the Professionals on account of any outstanding balances on the fees and expenses approved herein, as set forth on **Exhibit 1**.

4. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

5. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Final Fee Applications.

6. This Order shall be deemed a separate order with respect to each of the Final Fee Applications. Any stay of this Order pending appeal with respect to any one Professional shall only apply to the particular Professional that is the subject of such appeal, and shall not operate to stay the applicability and/or finality of this Order with respect to any other Professional

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

Exhibit 1

Schedule of Professional Compensation

Professional Compensation for the period from
February 26, 2026, through and including July 10, 2026

APPLICANT	APPLICATION	FEES REQUESTED	EXPENSES REQUESTED	AGREED REDUCTIONS	FINAL FEES APPROVED	FINAL EXPENSES APPROVED
Willkie Farr & Gallagher LLP (Co-Counsel to the Committee)	Docket No. 548 Filed 08.20.2026	$931,430.50	$1,311.55	$795.00 (Fees)	$930,635.50	$1,311.55
FTI Consulting, Inc. (Financial Advisor to the Committee)	Docket No. 549 Filed 08.20.2026	$310,507.00	$95.53	$0.00 (Fees) $0.00 (Expenses)	$310,507.00	$95.53
Womble Bond Dickinson (US) LLP (Delaware Co-Counsel to the Committee)	Docket No. 550 Filed 08.20.2026	$92,612.00	$319.23	$0.00 (fees) $0.00 (expenses)	$92,612.00	$319.23
	TOTALS:	**$1,334,549.50**	**$1,726.31**	**$795.00**	**$1,333,754.50**	**$1,726.31**