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ATTORNEYS FOR DEFENDANT AIRBUS HELICOPTERS, S.A.S.

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re: CHC GROUP LTD., *et al.*, Debtors.	Chapter 11 Case No. 16-31854 (BJH) (Jointly Administered)
ECN CAPITAL (AVIATION) CORP., Plaintiff, v. AIRBUS HELICOPTERS, S.A.S., Defendant.	Adv. Pro. No. 16-3151 (BJH)

DEFENDANT AIRBUS HELICOPTERS, S.A.S.'S MOTION TO DISMISS FOR LACK OF SUBJECT MATTER AND PERSONAL JURISDICTION, AND ON THE GROUNDS OF *FORUM NON CONVENIENS*

Defendant Airbus Helicopters S.A.S. ("AH") moves to dismiss the above-captioned adversary proceeding complaint filed by ECN Capital (Aviation) Corp. ("ECN"), and respectfully states as follows:

AH moves to dismiss this action pursuant to Fed. R. Bankr. P. 7012(b) and Fed. R. Civ. P. 12(b)(1) and (b)(2) because the Court lacks subject matter jurisdiction over this action and lacks personal jurisdiction over AH. Even if the Court finds that it has jurisdiction, it should abstain from hearing this matter under 28 U.S.C. § 1334(c)(1), or on the grounds of *forum non conveniens*, so that it may be heard in the courts of France. Pursuant to Local Bankruptcy Rule 7007-1(d), the substantive bases for the Motion to Dismiss are set forth in AH's brief in support of the Motion to Dismiss.

For the reasons set forth in that brief, AH respectfully requests the court to grant the Motion to Dismiss and grant such other relief to which AH may be entitled.

Dated: January 3, 2017.

Respectfully submitted,

HIERSCHE, HAYWARD, DRAKELEY & URBACH, P.C.

/s/ Jason M. Katz

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ATTORNEYS FOR DEFENDANT
AIRBUS HELICOPTERS, S.A.S.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on January 3, 2017, a true and correct copy of the above and foregoing document was filed with the court via CM/ECF and served on all parties requesting electronic notification.

/s/ Jason M. Katz
Jason M. Katz

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re: CHC GROUP LTD., *et al.*, Debtors.	Chapter 11 Case No. 16-31854 (BJH) (Jointly Administered)
ECN CAPITAL (AVIATION) CORP., Plaintiff, v. AIRBUS HELICOPTERS, S.A.S., Defendant.	Adv. Pro. No. 16-3151 (BJH)

ORDER GRANTING MOTION TO DISMISS FOR LACK OF SUBJECT MATTER AND PERSONAL JURISDICTION, AND ON THE GROUNDS OF *FORUM NON CONVENIENS*

CAME ON FOR CONSIDERATION, the *Defendant Airbus Helicopters, S.A.S.'s ("AH's") Motion to Dismiss For Lack of Subject Matter and Personal Jurisdiction, and on the*

Grounds of Forum Non Conveniens, and the materials submitted in support of that Motion, the Court has determined that AH's Motion to Dismiss should be, and hereby is, GRANTED and the adversary proceeding DISMISSED.

 # # # End of Order # # #

SUBMITTED BY:

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