Docket #0055 Date Filed: 1/18/2017

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COUNSEL FOR PLAINTIFF ECN CAPITAL (AVIATION) CORP.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	**Chapter 11**
CHC GROUP LTD., *et al.*,	**Case No. 16-31854(BJH)**
Debtor,	**(Jointly Administered)**
ECN CAPITAL (AVIATION) CORP.,	**Adv. Proc. No. 16-03151-bjh**
Plaintiff,	**PLAINTIFF ECN CAPITAL (AVIATION) CORP.'S INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 7026**
v.	
AIRBUS HELICOPTERS (SAS),	
Defendant.	

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Pursuant to Federal Rule of Bankruptcy Procedure 7026, plaintiff ECN Capital (Aviation) Corp. ("ECN Capital"), by its undersigned counsel, hereby provides the following initial disclosures ("Initial Disclosures").

The following information reflects the current knowledge of ECN Capital and is given without prejudice to producing during discovery or introducing at trial such data, information, documents or witnesses that are: (i) subsequently discovered, (ii) subsequently determined to be relevant for any purpose, or (iii) subsequently determined to have been omitted from these disclosures.

The following information is subject to, and without waiver of, ECN Capital's right to assert any and all objections to competency, relevancy, materiality, privilege, work-product, use, or admissibility as evidence, for any purpose, of any of these Initial Disclosures or of the subject matter of these Initial Disclosures, in these or any subsequent proceedings.

ECN Capital reserves the right at any time to supplement, amend, or correct these disclosures, if appropriate, as investigation and discovery are conducted, and as this action proceeds, and to rely on witnesses or documents identified in the initial disclosures of other parties.

I. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

The following persons currently associated with ECN Capital, other than counsel in this matter, are likely to have discoverable information relating to some or all of the allegations in ECN Capital's Complaint, dated November 17, 2016 (the "Complaint"):

Name and Contact Information	Subject Matter
Algis Vaitonis c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019-6064 (212) 373-3000	• ECN Capital's purchase of EC225 and AS332 L2 helicopters from CHC (Barbados)[1] • ECN Capital's leaseback of EC225 and AS332 L2 helicopters to CHC (Barbados) • CHC's rejection of leases of ECN Capital's EC225 and AS332 L2 helicopters in the CHC Bankruptcy Cases • Storage and preservation of ECN Capital's EC225 and AS332 L2 helicopters • ECN Capital's remarketing for sale or lease of EC225 and AS332 L2 helicopters
Michael O'Keefe c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019-6064 (212) 373-3000	• ECN Capital's purchase of EC225 and AS332 L2 helicopters from CHC (Barbados) • ECN Capital's leaseback of EC225 and AS332 L2 helicopters to CHC (Barbados) • CHC's rejection of leases of ECN Capital's EC225 and AS332 L2 helicopters in the CHC Bankruptcy Cases • ECN Capital's remarketing for sale or lease of EC225 and AS332 L2 helicopters
Michael Lederman c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019-6064 (212) 373-3000	• ECN Capital's purchase of EC225 and AS332 L2 helicopters from CHC (Barbados) • ECN Capital's leaseback of EC225 and AS332 L2 helicopters to CHC (Barbados) • CHC's rejection of leases of ECN Capital's EC225 and AS332 L2 helicopters in the CHC Bankruptcy Cases • ECN Capital's remarketing for sale or lease of EC225 and AS332 L2 helicopters
Bruce Ells c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019-6064 (212) 373-3000	• ECN Capital's purchase of EC225 and AS332 L2 helicopters from CHC (Barbados) • ECN Capital's leaseback of EC225 and AS332 L2 helicopters to CHC (Barbados)

[1] All capitalized terms not defined herein have the meanings stated in the Complaint.

Warren Willits c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019-6064 (212) 373-3000	• Storage and preservation of ECN Capital's EC225 and AS332 L2 helicopters • ECN Capital's remarketing for sale or lease of EC225 and AS332 L2 helicopters

The following persons who have never been employed by ECN Capital are likely to have information relating to some or all of the allegations in the Complaint:

Name and Contact Information	**Subject Matter**
Kevin Cabaniss c/o Airbus Helicopters, Inc. 2701 Forum Drive Grand Prairie, TX 75052 (972) 641-3550	• Claims and interests of Airbus Helicopters (SAS) and/or its affiliates in the CHC Bankruptcy Cases • Involvement of Airbus Helicopters (SAS) and/or its affiliates in the CHC Bankruptcy Cases • Presence, sales, and products of Airbus Helicopters (SAS) and/or its affiliates in the United States • Litigation or other proceedings against Airbus Helicopters (SAS) and/or its affiliates regarding EC225 or AS332 L2 helicopters
Guillaume Faury Chief Executive Officer Airbus Helicopters (SAS) c/o Nixon Peabody LLP 437 Madison Ave New York, NY 10022-7039 (212) 940-3000	• Advertisement, marketing, and sale of EC225 or AS332 L2 helicopters by Airbus Helicopters (SAS) and/or its affiliates • Design and manufacturing of EC225 or AS332 L2 helicopters • Presence, sales, and products of Airbus Helicopters (SAS) and/or its affiliates in the United States • Litigation or other proceedings against Airbus Helicopters (SAS) and/or its affiliates regarding EC225 or AS332 L2 helicopters • Any involvement in, or response to, helicopter crashes, groundings, or other major incidents by Airbus Helicopters (SAS) and/or its affiliates • Airbus Helicopters (SAS) corporate structure

Michel Gouraud Head of Distribution and Services Network Airbus Helicopters (SAS) c/o Nixon Peabody LLP 437 Madison Ave New York, NY 10022-7039 (212) 940-3000	• Presence, sales, and products of Airbus Helicopters (SAS) and/or its affiliates in the United States
Nigel Taylor Senior Vice President Customer, Project and Structured Finance Airbus Group c/o Airbus S.A.S. (FF) 1 Rond Point Maurice Bellonte B01 - 1A3 - 31707 Blagnac - France	• Presence, sales, and products of Airbus Helicopters (SAS) and/or its affiliates in the United States • Litigation or other proceedings against Airbus Helicopters (SAS) and/or its affiliates regarding EC225 or AS332 L2 helicopters • Advertisement, marketing, and sale of EC225 or AS332 L2 helicopters by Airbus Helicopters (SAS) and/or its affiliates
Dr. Thomas Enders Chief Executive Officer Airbus Group SE Mendelweg 30 Leiden, Zuid-Holland, 2333 CS The Netherlands	• Advertisement, marketing, and sale of EC225 or AS332 L2 helicopters by Airbus Helicopters (SAS) and/or its affiliates • Design and manufacturing of EC225 or AS332 L2 helicopters • Presence, sales, and products of Airbus Helicopters (SAS) and/or its affiliates and subsidiaries in the United States • Litigation or other proceedings against Airbus Helicopters (SAS) and/or its affiliates regarding EC225 or AS332 L2 helicopters • Airbus Helicopters (SAS) corporate structure
Jeff Trang c/o Airbus Helicopters, Inc. 2701 N. Forum Drive Grand Prairie, TX 75052 (972) 641-0000	• Airbus Helicopters, Inc.'s procedures for rotorcraft certification • Federal Aviation Administration's airworthiness standards for rotorcraft
Michael B. Cox Vice Chairman Seabury Advisory Group 1350 Avenue of the Americas 25th Floor New York, NY 10019 (212) 284-1133	• CHC Debtors' rejection of leases of EC225 and/or AS332 L2 helicopters in the CHC Bankruptcy Cases, including EC225 and/or AS332 L2 helicopters owned by ECN Capital • CHC Debtors' ownership, lease, and/or abandonment of EC225 and/or AS332 L2 helicopters • CHC Debtors' damages, rights, liabilities, and property in connection with EC225 and/or

	AS332 L2 helicopters
Robert Del Genio Managing Member CDG Group, LLC 650 Fifth Avenue, 20th floor New York, New York 10019 (212) 813-1640	• CHC Debtors' rejection of leases of EC225 and/or AS332 L2 helicopters in the CHC Bankruptcy Cases, including EC225 and/or AS332 L2 helicopters owned by ECN Capital • CHC Debtors' ownership, lease, and/or abandonment of EC225 and/or AS332 L2 helicopters • CHC Debtors' damages, rights, liabilities, and property in connection with EC225 and/or AS332 L2 helicopters
John Shelburg Director – Fleet Management CHC Helicopter Support Services (U.S.), Inc. 600 E. Las Colinas Blvd., Suite 1000 Irving, TX 75039 Tel: +1.214.262.7300	• CHC Debtors' rejection of leases of EC225 and/or AS332 L2 helicopters in the CHC Bankruptcy Cases, including EC225 and/or AS332 L2 helicopters owned by ECN Capital • CHC Debtors' ownership, lease, and/or abandonment of EC225 and/or AS332 L2 helicopters • CHC Debtors' damages, rights, liabilities, and property in connection with EC225 and/or AS332 L2 helicopters

II. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

ECN Capital hereby provides the following description by category of documents, data, compilations, and tangible things in its possession, custody, or control, and presently known to it, that it may use to support their claims or defenses, unless solely for impeachment, all of which are located in Ontario, Canada:

1. Documents concerning ECN Capital's purchase of four AS332 L2 helicopters and one EC225 helicopter from CHC (Barbados).

2. Documents concerning ECN Capital's leaseback of four AS332 L2 helicopters and one EC225 helicopter to CHC (Barbados).

3. Documents concerning ECN Capital's recovery, storage, maintenance, registration and remarketing, for sale or lease, of four AS332 L2

helicopters and one EC225 helicopter following the rejection of the leases of such aircraft by CHC (Barbados) in the CHC Bankruptcy Cases.

III. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Fed. R. Civ. P. 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

With respect to ECN Capital's claims against Airbus, ECN Capital seeks monetary damages relating to the value of AS332 L2 registration mark G-PUMS, AS332 L2 registration mark G-PUMM, EC225LP registration mark G-OAGA, AS332 L2 registration mark LN-OHE, and AS332 L2 registration mark G-PUMO, in an amount no less than $83,330,000, plus interest. ECN also seeks punitive and exemplary damages, attorneys' fees and costs, prejudgment and postjudgment interest, and such additional damages as may be available under applicable statutes.

IV. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

At the current time, ECN Capital is not aware of any applicable insurance agreement.

Dated: January 17, 2017
Dallas, Texas

KANE RUSSELL COLEMAN & LOGAN PC

By: /s/ *George H. Barber*
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Counsel for Plaintiff
ECN Capital (Aviation) Corp.

CERTIFICATE OF SERVICE

I hereby certify that, on January 17, 2017, I caused the foregoing Initial Disclosures to be served via electronic mail and First Class U.S. Mail, postage prepaid, to the following counsel of record for the Defendant:

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