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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 SAS, Defendant.	Adv. Pro. No. 16-3151 (BJH)

DEFENDANT AIRBUS HELICOPTERS, S.A.S.'S MOTION
FOR SETTING AND REQUEST FOR EXPEDITED HEARING

TO THE HONORABLE BARBARA J. HOUSER,
CHIEF UNITED STATES BANKRUPTCY JUDGE:

1. Defendant Airbus Helicopters, S.A.S. ("AH"), subject to and without waiving its objections to the Court's subject matter and personal jurisdiction, and its Motion to Dismiss for Lack of Subject Matter and Personal Jurisdiction, and on the Ground of *Forum Non Conveniens*,



requests that a hearing be set on their Motion For Continuance of Trial, Stay of Deadlines And Brief In Support on February 6, 2017 at 9:00 a.m. (the "Motion"). Hearing by such date is necessary because the Court is already holding a status conference on February 6, 2017 at 9:00 a.m. to discuss the provisions and deadlines of a new scheduling order in lieu of the alternative scheduling order.

2. The Motion seeks an order from the Court that (a) continues the trial date in the Adversary Proceeding, (b) stays all deadlines set forth in the Scheduling Order dated November 18, 2016, until further order of the Court and (c) requires an amended scheduling order be submitted to the Court only if the Motion to Dismiss is denied (and if the Motion for Withdrawal of Reference is denied or if the United States District Court requests that this Court handle all pre-trial matters under a Bankruptcy Court scheduling order).

3. Continuance of the trial date and staying all deadlines in the scheduling order is necessary because the jurisdiction and procedural issues raised in the AH's Motion for Withdrawal of Reference[1] and Motion to Dismiss should be addressed first for the reasons stated in the Motion.

4. Notice of the proposed expedited hearing will be provided to Counsel for ECN Capital (Aviation) Corp., George H. Barber and Robert N. LeMay, Kane Russell Coleman & Logan PC, 1601 Elm Street, Ste. 3700 Dallas, Texas 75201 and Martin Flumenbaum and Roberta A. Kaplan, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 via e-mail at gbarber@krcl.com, rlemay@krcl.com, mflumenbaum@paulweiss.com, and rkaplan@paulweiss.com. Such Notice will be sufficient because ECN Capital (Aviation) Corp. is the Plaintiff in this case.

5. A hearing was not requested earlier because counsel for Plaintiff notified counsel for AH on January 19, 2017 that Plaintiff expected AH to comply with the existing deadlines in the scheduling order despite the parties' agreement in principle to move the trial date.

Dated: January 20, 2017.

Respectfully submitted,

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

By: */s/ Jason M. Katz*

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[1] Capitalized terms used herein shall have the meanings ascribed to such terms in the Motion, unless otherwise expressly indicated.

---AND---

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ATTORNEYS FOR DEFENDANT AIRBUS HELICOPTERS S.A.S.

CERTIFICATE OF CONFERENCE

On January 20, 2017, the undersigned attorney had a conference via e-mail with counsel for Plaintiff to discuss the relief sought in this opposed motion. At the time of the filing of the Motion, counsel for Plaintiff had not yet responded to the e-mail or voicemails.

/s/ Jason M. Katz
Jason M. Katz

DECLARATION

I hereby verify that the statements made in the foregoing facts in the Motion for Expedited Hearing are true and correct to the best of my knowledge and belief.

/s/ Jason M. Katz
Jason M. Katz

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on January 20, 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
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 SAS, Defendant.	Adv. Pro. No. 16-3151 (BJH)

ORDER REGARDING REQUEST FOR EXPEDITED CONSIDERATION OR HEARING

The request for expedited consideration or hearing on Defendant Airbus Helicopters, S.A.S.'s Motion For Continuance of Trial, Stay of Deadlines And Brief In Support on February 6, 2017 at 9:00 a.m. is GRANTED.

___X___ A hearing will be held in Room 1424 (Courtroom #2), 14th Floor, 1100 Commerce Street, Dallas, Texas 75242-1496 on February 6, 2017 at 9:00 a.m. Counsel for movant is required to serve notice of this hearing on counsel for Plaintiff.

_____ No expedited hearing will be scheduled.

##End of Order##