

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: :  
: Chapter 11  
WAS SERVICES, INC., et al.,<sup>1</sup> :  
: Case No. 12-10799 (MFW)  
: Debtors. :  
: Jointly Administered  
: :  
: **Objection Deadline: June 12, 2013 at 4:00 p.m. (ET)**  
: **Hearing Date: June 24, 2013 at 3:00 p.m. (ET)**  
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**NOTICE OF MOTION**

TO: (I) OFFICE OF THE UNITED STATES TRUSTEE FOR THE DISTRICT OF DELAWARE; (II) COUNSEL TO AVION SERVICES HOLDINGS, LLC; AND (III) ALL PARTIES THAT HAVE REQUESTED NOTICE PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2002.

**PLEASE TAKE NOTICE** that Clingman & Hanger Management Associates, LLC, as plan administrator (the "Plan Administrator") for the above captioned reorganized debtors (collectively, the "Debtors"), pursuant to the *Debtors' First Amended Joint Plan of Liquidation* [D.I. 784] (the "Amended Plan"), filed the attached *Plan Administrator's Motion for an Order Pursuant to Bankruptcy Rules 9006(b) and 9027 Further Extending the Period Within Which the WAS Debtors may Remove Actions Pursuant to 28 U.S.C. § 1452* (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that any objections to the relief requested in the Motion must be filed on or before **June 12, 2013 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must serve a copy of your response upon the undersigned counsel to the Plan Administrator so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON JUNE 24, 2013 AT 3:00 P.M. (ET) BEFORE THE HONORABLE MARY F. WALRATH, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.**

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number, include: WAS Services, Inc. (f/k/a Pemco World Air Services, Inc.) (5213), WAS Services Holding Corp. (f/k/a WAS Aviation Services, Inc.) (5661), and WAS Services Holding II, Inc. (f/k/a WAS Aviation Services Holding Corp.) (5698) (collectively, the "WAS Debtors"), and Sun Aviation Services, LLC (4329) ("Sun Aviation"). The location of the WAS Debtors' corporate headquarters and the WAS Debtors' service address is: 4102 N. Westshore Blvd., Tampa, Florida 33614. The location of Sun Aviation's corporate headquarters and Sun Aviation's service address is: 5200 Town Center Circle, Suite 600, Boca Raton, Florida 33486.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND TO THE MOTION IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: May 29, 2013  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

*/s/ Justin P. Duda*

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