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

In re:

ONE AVIATION CORPORATION, et al.,1

Debtors.

Chapter 7

Case No. 18-12309 (CSS)

(Jointly Administered)

#### NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the law firms of Lazarus & Lazarus, P.C. and Womble Bond Dickinson (US) LLP hereby enter their appearances as counsel for Citiking International US LLC ("Citiking") in the chapter 7 bankruptcy cases (the "Bankruptcy Cases") of the above-captioned debtors (the "Debtors").

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Bankruptcy Rules 2002(i), 3017, and 9007, the undersigned request that copies of all notices, pleadings, and all other papers required to be served in the Bankruptcy Cases be served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

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<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each debtor's tax identification number, as applicable, are: ONE Aviation Corporation (9649); ACC Manufacturing, Inc. (1364); Aircraft Design Company (1364); Brigadoon Aircraft Maintenance, LLC (9000); DR Management, LLC (8703); Eclipse Aerospace, Inc. (9000); Innovatus Holding Company (9129); Kestrel Aircraft Company, Inc. (2053); Kestrel Brunswick Corporation (6741); Kestrel Manufacturing, LLC (1810); Kestrel Tooling Company (9439); and OAC Management, Inc. (9986). The Debtors' corporate headquarters is located at 3250 Spirit Drive SE, Albuquerque, NM 87106.

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 342, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any orders and notices of any notice, application, complaint, demand, motion, petition, pleading, disclosure statement or plan, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the Bankruptcy Cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, nor any subsequent appearance, pleading, claim, or suit, is intended to waive: (a) the right of Citiking to have final orders in (i) non-core matters, and (ii) matters designated for final adjudication in the Bankruptcy Court as a statutory matter pursuant to 28 U.S.C. § 157(b), but prohibited from proceeding as such pursuant to Article III of the Constitution, entered only after de novo review by a federal district court judge (and nothing contained herein shall be construed or otherwise deemed to be a waiver of such right by Citiking consent by Citiking to final adjudication in the Bankruptcy Court of such matters); (b) the right of Citiking to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretional withdrawal; (c) the right of Citiking to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (d) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (e) an election of remedy; or (f) any other rights, claims, actions, defenses, setoffs, or recoupments to which Citiking is or may be entitled under any agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: August 30, 2021

Wilmington, Delaware

## WOMBLE BOND DICKINSON (US) LLP

## /s/ Kevin J. Mangan

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