

WILLKIE FARR & GALLAGHER LLP

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*Proposed Counsel for the Official Committee
of Unsecured Creditors of Spirit Aviation Holdings, Inc., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
SPIRIT AVIATION HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 25-11897-SHL
)	
Debtors.)	(Jointly Administered)
)	
)	

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Official Committee of Unsecured Creditors of Spirit Aviation Holdings, Inc. (the “Committee”) on behalf of themselves and Willkie Farr & Gallagher LLP, as proposed counsel for the Committee, hereby appear in the above-captioned chapter 11 cases of Spirit Aviation Holdings, Inc., *et al.* (the “Debtors”) and requests, pursuant to Bankruptcy

¹ The Debtors’ names and last four digits of their respective employer identification are as follows: Spirit Aviation Holdings, Inc. (1797); Spirit Airlines, LLC (7023); Spirit Finance Cayman 1 Ltd. (7020); Spirit Finance Cayman 2 Ltd. (7362); Spirit IP Cayman Ltd. (4732); and Spirit Loyalty Cayman Ltd. (4752). The Debtors’ mailing address is 1731 Radiant Drive, Dania Beach, FL 33004.

Rules 2002, 9007 and 9010 and Bankruptcy Code section 342, that all papers, pleadings, motions, and applications served or required to be served in these cases be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Bankruptcy Rules and the Bankruptcy Code specified above, but also includes, without limitation, all orders and notices on any application, motion, petition, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by ordinary mail, hand delivery, telephone, facsimile, electronic mail, or otherwise, which may affect or seek to affect in any way any rights or interests of the Committee with respect to the Debtors' estates, or any related entities, or property or proceeds thereof in which the Debtors' estates may claim an interest.

PLEASE TAKE FURTHER NOTICE that this appearance shall not be deemed or construed to be a waiver of the right of the Committee (i) to have final orders in non-core matters entered only after *de nova* review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or any case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions,

setoffs, or recoupments to which the Committee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Committee expressly reserves.

Dated: New York, New York
September 18, 2025

WILLKIE FARR & GALLAGHER LLP

/s/ Brett H. Miller

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