

DEBEVOISE & PLIMPTON LLP
66 Hudson Boulevard East
New York, New York 10001
Tel.: (212) 909-6000
Jasmine Ball
Elie J. Worenklein

*Fleet Counsel to the Debtors and
Debtors in Possession*

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

Re: ECF Nos. 531, 582

In re:

SPIRIT AVIATION HOLDINGS, INC., et al.,

Debtors.¹

Chapter 11

Case No. 25-11897 (SHL)

Jointly Administered

**NOTICE OF WITHDRAWAL
OF THE DEBTORS' THIRD OMNIBUS
MOTION FOR ENTRY OF AN ORDER AUTHORIZING
THE DEBTORS TO REJECT CERTAIN EQUIPMENT LEASES
PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE SOLELY
WITH RESPECT TO THE EQUIPMENT SET FORTH ON EXHIBIT A HERETO**

Spirit Aviation Holdings, Inc. and its direct and indirect subsidiaries (collectively, the “**Debtors**,” the “**Company**,” or “**Spirit**”), each of which is a debtor and debtor in possession in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), respectfully state as follows:

1. On December 2, 2025, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Debtors’ Third Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Equipment Leases Pursuant to Section 365 of the Bankruptcy Code* (the “**Motion**”)² seeking authorization to reject leases associated with 11 aircraft.

¹ The Debtors’ names and last four digits of their respective employer identification numbers 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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

See ECF No. 531. Attached to the Motion was a schedule (“**Schedule 1**”) of the 11 aircraft leases covered by the Motion that the Debtors sought to reject pursuant to section 365 of the Bankruptcy Code (such aircraft, the “**Excess Equipment**”).

2. On December 10, 2025, the Debtors adjourned the hearing with respect to the Motion from December 16, 2025, to December 22, 2025 (the “**Notice of Adjournment**”). See ECF No. 582.

3. Following the filing of the Motion, the Debtors continued to consider methods for the return and surrender of certain aircraft, engines and other equipment in order to optimize their operations. As a result, the Debtors, upon mutual agreement with a certain Lessor, filed a stipulation pursuant to section 1110(b) of the Bankruptcy Code on December 5, 2025, which was approved by the Court on December 10, 2025, with respect to certain of the Excess Equipment on Schedule 1. See ECF Nos. 552 and 583.

4. As a result, the Debtors no longer seek to reject the Excess Equipment subject to such stipulation and accordingly seek to withdraw, without prejudice, the Motion, solely with respect to the Excess Equipment set forth on **Exhibit A** hereto. The Debtors expressly reserve all rights to refile, including any rejection or other elections, with respect to the Excess Equipment set forth on Exhibit A.

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Dated: December 21, 2025
New York, NY

DEBEVOISE & PLIMPTON LLP

/s/ Jasmine Ball

Jasmine Ball

Elie J. Worenklein

66 Hudson Boulevard

New York, NY 10001

Tel.: (212) 909-6000

jball@debevoise.com

eworenklein@debevoise.com

*Fleet Counsel to the Debtors and Debtors in
Possession*

Exhibit A

Excess Equipment Withdrawn from Consideration in Connection with Motion

Row	Debtor (Lessee)	Head Lessor¹	Aircraft Type²	MSN	Surrender Location	Effective Date of Rejection	Engine Type	Engine Manufacturer	ESN1	ESN2
1	Spirit Airlines, LLC	ST Engineering Aerospace Resources	A320-232C	6082	GYR	1/7/26	V2527-A5	IAE	17209	17219
2	Spirit Airlines, LLC	ST Engineering Aerospace Resources	A320-232C	6193	GYR	2/11/26	V2527-A5	IAE	17305	17311

¹ Notice information for each Lessor can be found in Schedule A to Exhibit A.

² All Aircraft are manufactured by Airbus, unless otherwise indicated.

Schedule A

**Notice Information for Head Lessors for Excess Equipment Withdrawn from
Consideration in Connection with Motion**

Notice Information - ST Engineering Aerospace Resources

Keystone 9 Limited
5th Floor, the Exchange
George's Dock
IFSC Dublin 1, Ireland
Attention: General Manager
Email: notices.keystone@stengg.com

ST Engineering Aerospace Resources (Ireland) Limited
3rd Floor, Kilmore House, Park Lane
Spencer Dock
Dublin 1, Ireland
Attention: The Directors
Email: notices.resources@stengg.com

ST Engineering Aerospace Resources Pte. Ltd.
600 West Camp Road
Singapore 797654
Attention: General Manager
Email: notices.resources@stengg.com

Bank of Utah, as owner trustee
50 South 200 East, Suite 110
Salt Lake City, UT 84111
Fax: 801-746-3519
Attention: Corporate Trust Services
Email: corptrust@bankofutah.com

Clifford Chance, New York
Attention: Michelle McGreal
Two Manhattan West
375 9th Avenue
New York, NY 10001
Tel: (212) 878-8000
Fax: (212) 878-8375
Email: Michelle.McGreal@CliffordChance.com