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Interested Party and Prospective Bidder

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:
Spirit Airlines, Inc., et al.,
Debtors.

Case No. 25-11897 (SHL)
Chapter 11

MOTION OF MICHAEL WILLIAMSON, PRO SE INTERESTED PARTY
AND PROSPECTIVE BIDDER, FOR A 30-DAY EXTENSION OF THE
PROPOSED LIQUIDATION DEADLINE AND TO PRESERVE
OPERATIONAL AVIATION ASSETS

Michael Williamson (“Movant”), appearing pro se as an interested party and prospective bidder, respectfully submits this Motion requesting a thirty (30) day extension of the proposed liquidation deadline and temporary suspension of actions that would result in the dismantling, piecemeal liquidation, transfer, or irreversible disposition of valuable operational aviation assets belonging to the Debtors, and in support thereof states as follows:

INTRODUCTION

1. Movant is the Founder and Chief Executive Officer of America Queen Airlines, LLC (“AQA”), an acquisition entity formed for the purpose of pursuing the acquisition, preservation, restructuring, and continued operation of certain aviation assets presently owned or controlled by the Debtors.

2. Movant, through AQA, is actively engaged in securing financing for a potential acquisition transaction involving the Debtors' operational aviation infrastructure and related assets, including but not limited to airworthy aircraft, spare engines, aviation parts inventory, maintenance-related assets, airport operational access and related infrastructure, airport kiosks, operational facilities, and other fixed assets associated with the Debtors' commercial airline operations.
3. Movant represents that financing discussions and supporting acquisition materials have been submitted to a prospective financing source with the financial capacity to support the contemplated transaction. Movant is presently awaiting conditional financing review, proof of funds documentation, and related determinations, subject to customary due diligence, regulatory review, and transaction structuring requirements.
4. Certain supporting communications, financing materials, and related records exist but are commercially sensitive and confidential in nature and therefore are not attached to this Motion.
5. Movant is prepared to provide additional information to the Court, subject to appropriate confidentiality protections, if requested.
6. The Debtors have proposed or may imminently undertake an expedited liquidation process that could result in the dismantling of airworthy aircraft, liquidation of spare engines and aviation parts, forfeiture or reassignment of airport operational infrastructure, and disposition of other fixed assets prior to the completion of Movant's financing process and submission of a formal bid.

7. Movant respectfully submits that premature liquidation and dismantling of operational aviation assets may irreversibly impair the value of the bankruptcy estate, reduce the availability of competitive bidding opportunities, diminish potential recoveries for creditors, and eliminate the possibility of preserving ongoing aviation operations and related employment opportunities. Once dismantled or liquidated, many of these aviation assets cannot practically be reassembled into an operational commercial airline platform.
8. Accordingly, Movant respectfully requests a brief thirty (30) day extension to preserve the status quo and permit completion of the financing review process so that a potentially value-maximizing transaction may be properly evaluated for the benefit of the bankruptcy estate, creditors, employees, and other stakeholders.

JURISDICTION AND STANDING

9. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
10. Movant respectfully submits that he is a party in interest and prospective bidder with a direct economic interest in the preservation and disposition of the Debtors' aviation assets.

BACKGROUND

11. The Debtors commenced these Chapter 11 proceedings and have sought approval of an expedited liquidation timeline.
12. AQA is a duly organized acquisition entity formed for the purpose of pursuing the acquisition and continued operation of certain aviation assets currently owned by the Debtors.

13. Movant, through AQA, has prepared and submitted an acquisition proposal that includes a financial structure, operational plan, and asset integration strategy to a prospective financing source with the capacity to finance the contemplated transaction.
14. Movant, through AQA, is currently awaiting issuance of conditional financing review materials and/or proof of funds documentation, which Movant believes may be forthcoming imminently.
15. Without a brief extension of the proposed liquidation deadline, Movant may be deprived of the opportunity to finalize financing and participate meaningfully in the bidding process, potentially depriving the estate and creditors of a competitive bid that could materially enhance recoveries.

BASIS FOR RELIEF

16. Movant submits that a short extension of the proposed liquidation deadline is warranted because:
 - a. AQA is a bona fide prospective bidder actively pursuing financing in good faith;
 - b. Competitive bidding may materially increase value to the bankruptcy estate and creditor recoveries;
 - c. A thirty (30) day extension is modest, reasonable, and unlikely to materially prejudice the Debtors;
 - d. Premature dismantling of airworthy aircraft may irreversibly eliminate higher-value restructuring or acquisition opportunities; and

e. Bankruptcy courts routinely consider preservation of competitive bidding opportunities to maximize estate value under Chapter 11.

17. Movant respectfully submits that the requested relief is consistent with the principles and purposes of Chapter 11 and serves the best interests of the estate and all stakeholders.

18. Movant further submits that preservation of the Debtors' operational aviation assets serves broader stakeholder and public interests, including the potential preservation of thousands of aviation-related jobs, continuation of commercial air service, and avoidance of irreversible dismantling of airworthy aircraft before competitive acquisition opportunities may be fully evaluated. Movant believes that permitting additional time for viable bidders to complete financing efforts may enhance overall value for creditors while also supporting workforce and industry stability.

19. Movant respectfully requests permission to appear remotely for any hearings or proceedings related to this Motion due to substantial out-of-state travel limitations and requests that any such appearances be conducted virtually to the extent permitted by the Court.

REQUEST FOR RELIEF

WHEREFORE, Movant respectfully requests that this Court enter an Order:

- A. Granting a thirty (30) day extension of the proposed liquidation and dismantling deadline;
- B. Temporarily suspending the dismantling of airworthy aircraft during such extension period;
- C. Temporarily preserving the Debtors' existing airport operational access, including airport operational access, airport kiosks, and related operational infrastructure, airport kiosks, and related operational infrastructure, pending expiration of the requested extension period;

D. Permitting interested bidders, including Movant and affiliated acquisition entities, additional time to complete financing and participate meaningfully in the bidding process; and

E. Permitting Movant to appear remotely for any hearings or proceedings related to this Motion; and

F. Granting such other and further relief as the Court deems just and proper.

Movant reserves all rights and requests that this Motion be considered without prejudice to any additional relief that may subsequently be requested.

Dated: May 7, 2026

Respectfully submitted,

By: /s/ Michael Williamson
Michael Williamson, Pro Se
Interested Party and Prospective Bidder

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DECLARATION UNDER PENALTY OF PERJURY

I, Michael Williamson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed on: May 7, 2026

/s/ Michael Williamson
Michael Williamson, Pro Se
Interested Party and Prospective Bidder

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

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NOTICE OF MOTION

PLEASE TAKE NOTICE that Michael Williamson (“Movant”), appearing pro se as an interested party and prospective bidder, has filed the annexed Motion seeking entry of an Order granting a 30-day extension of the proposed liquidation deadline and temporarily preserving operational aviation assets pending further proceedings before this Court.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested herein must be filed in accordance with the Court’s procedures.

Dated: May 7, 2026

By: /s/ Michael Williamson
Michael Williamson, Pro Se
Interested Party and Prospective Bidder

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CERTIFICATE OF SERVICE

I, Michael Williamson, certify that on May 7, 2026, I caused a true and correct copy of the foregoing Motion of Michael Williamson, Pro Se Interested Party and Prospective Bidder, for a 30-Day Extension of the Proposed Liquidation Deadline and to Preserve Operational Aviation Assets to be filed electronically through the Court's CM/ECF system.

I further certify that the Court's CM/ECF system will automatically generate a Notice of Electronic Filing upon all registered parties and counsel of record in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 7, 2026

/s/ Michael Williamson
Michael Williamson, Pro Se
Interested Party and Prospective Bidder