

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

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<i>In re</i>	:	Chapter 11
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SPIRIT AVIATION HOLDINGS, INC., <i>et al.</i> ,	:	Case No. 25-11897-SHL
	:	
	:	(Jointly Administered)
Debtors. ¹	:	
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**CONSUMER PRIVACY OMBUDSMAN (CPO) REQUEST FOR EXTENSION
OF TIME TO FILE CPO REPORT TO THE COURT**

I, the undersigned, Lucy L. Thomson, Consumer Privacy Ombudsman (CPO), request an extension of time up to and including Wednesday, August 19, 2026 to file my CPO Report to the Court.

1. Pursuant to the Order approving the Stipulation and Agreed Order Directing the United States Trustee to Appoint a Consumer Privacy Ombudsman (Doc. No. 1332, filed July 15, 2026), the United States Trustee appointed Lucy L. Thomson as the Consumer Privacy Ombudsman in this case. (Doc. Nos. 1350 and 1351, filed 7/17/26). The Court approved this appointment on July 23, 2026 (Doc. No. 1380).
2. The Order approving the Stipulation and Agreed Order provides at paragraph 4 that if a report or recommendation of the CPO is required to be submitted, then any such report or recommendation must be submitted at least seven (7) days prior to the Sale Hearing.

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.

3. I am an experienced consumer privacy professional, having been appointed the CPO in 40 federal bankruptcy cases prior to this one. I am a Certified Information Privacy Professional (CIPP/US) and a Certified Information Systems Security Professional (CISSP).

4. This case presents novel and complex privacy issues related to the sale of as many as 90 million Spirit Airline passenger records. The proposed asset sale is on a fast-track schedule that provides limited time for the CPO to conduct her review, including the analysis of documents that have not yet been received and the identification of successful bidders who have not yet been selected.

5. The CPO's appointment was approved on July 23, 2026, only 21 business days before the sale hearing scheduled for August 19, 2026. The CPO gained access to the Spirit Data Room on August 11, 2026 where the consumer personal data offered for sale is described and must be analyzed. This week the Debtors are conducting two auctions for the sale of the Spirit PII and other data and they have not yet announced the successful bidders.

6. I will have calls with counsel for the parties in the coming days and expect further communications will take place throughout the coming week. As my work proceeds, I expect to receive further information and data from the Debtors and the Buyers this week and into next week.

7. Based on my work as the CPO over many years, it takes time to collect and analyze the information the Court will need to make a decision on whether to approve the sale or transfer of the personally identifiable consumer records in this bankruptcy case. In my experience, decisions concerning the sale of PII are nearly always made close to the sale hearing that affect the CPO's recommendations.

8. I will file my CPO Report to the Court as soon as possible and prior to the sale hearing currently scheduled for Wednesday, August 19, 2026.

9. THEREFORE, I, Lucy L. Thomson, request an extension of time to August 19, 2026 to file my CPO Report to the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: August 12, 2026

./s/ Lucy L. Thomson_____.
Lucy L. Thomson
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ORDER

FOR GOOD CAUSE SHOWN, the Motion of Lucy L. Thomson, Consumer Privacy Ombudsman, for an extension of time to August 19, 2026 to file her CPO Report to the Court is hereby GRANTED.

Dated:

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Judge

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