

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

In re: SPIRIT AVIATION HOLDINGS, INC., et al., Debtors.	Case No. 25-11897 (SHL) Chapter 11 (Jointly Administered)
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**NOTICE OF ADOPTION AND JOINDER IN LIMITED OBJECTION OF THE
ASSOCIATION OF FLIGHT ATTENDANTS-CWA, AFL-CIO
TO THE PROPOSED SALE OF THE DEIDENTIFIED DATA**

Professional Airline Flight Control Association (“PAFCA”), by and through undersigned counsel, hereby files this Notice of Adoption and Joinder in the Limited Objection of the Association of Flight Attendants-CWA, AFL-CIO to the Proposed Sale of the Deidentified Data [ECF No. 1489] (the “AFA Objection”), and respectfully states as follows:

- 1) PAFCA adopts and incorporates by reference the arguments, objections, reservations of rights, and requests for relief set forth in the AFA Objection as though fully set forth herein.
- 2) PAFCA joins in the AFA Objection to the extent the proposed sale of Deidentified Data would transfer, license, provide access to, or permit use of confidential employee, labor, personnel, payroll, tax, grievance, disciplinary, investigatory, medical, leave, accommodation, training, performance, union, collective-bargaining, communications, Microsoft 365, or other employment-related information without adequate protections.
- 3) PAFCA further joins in AFA’s request that any order approving the transaction expressly and categorically exclude protected employee information from the assets to be transferred, or, at a minimum, impose safeguards sufficient to identify, segregate, remove, restrict, and prevent the transfer or use of confidential employee and labor-related information, including free-form email, Teams, OneDrive, and SharePoint content.
- 4) Nothing in this Notice shall be deemed to limit, waive, or prejudice any rights, claims, defenses, objections, or arguments of PAFCA, including the right to supplement this

Notice, appear and be heard at any hearing, object to the form of any proposed sale order, seek discovery, or request additional or different relief.

WHEREFORE, Professional Airline Flight Control Association (“PAFCA”) respectfully requests that the Court sustain the AFA Objection, deny approval of the proposed sale unless the Sale Order and Sale Agreement provide the exclusions and protections requested in the AFA Objection, grant such other and further relief as the Court deems just and proper, and preserve all rights of Professional Airline Flight Control Association (“PAFCA”).

Dated: August 25, 2026

Respectfully submitted,

SUGARMAN, SUSSKIND & BRASWELL, P.A.

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