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Pro Hac Vice Motion Pending

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

In re:

SPIRIT AVIATION HOLDINGS INC., *et al.*,

Debtors.¹

Case No. 25-11897 (SHL)

Chapter 11

(Jointly Administered)

**LIMITED OBJECTION OF SOUTHWEST AIRLINES PILOTS ASSOCIATION
TO THE PROPOSED SALE OF THE DEIDENTIFIED DATA**

Southwest Airlines Pilots Association (“SWAPA”), the certified collective bargaining representative of the pilots of Southwest Airlines, including more than three hundred (300) pilots formerly employed by the Debtor Spirit Airlines, Inc. (“Spirit”), respectfully submits this objection to the approval of the sale of the Deidentified Data described in the *Notice of Auction Results and Scheduled Hearing for the Deidentified Data* [ECF No. 1463], and states as follows:

SWAPA joins, adopts, and incorporates the objections of Air Line Pilots Association, International - *Limited Objection of Air Line Pilots Association, International To The Debtors’ Proposed Sale of Deidentified Data* [ECF No. 1558], and the objection of the Association of Flight Attendants-CWA, AFL-CIO - *Limited Objection of the Association of Flight Attendants-CWA,*

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.

AFL-CIO to the Proposed Sale of the Deidentified Data [ECF No. 1489], as the concerns raised and arguments contained therein apply to pilots formerly employed by Spirit and who are now members of SWAPA.

The proposed sale of data containing confidential and otherwise non-public information relating to flight crews not only would adversely impact hundreds of current SWAPA members through the disclosure of their confidential employment and training related information from their time at Spirit Airlines, but it also threatens to have a chilling effect across all commercial airlines. As outlined in the Limited Objections filed by the Air Line Pilots Association, crew members throughout the industry regularly participate in voluntary safety and training programs with the belief and expectation that the information shared through those programs will remain confidential. To permit that information to later be sold to a third-party without ensuring complete deidentification and satisfactory confidentiality protections will serve to threaten the voluntary safety and training programs that provide the backbone of the commercial aviation industry in the United States. For these, and all the additional reasons raised by both the Air Line Pilots Association and the Association of Flight Attendants, we respectfully join in the request for the Court to reject the proposed Sale Agreement until such time as the concerns regarding crew member data have been satisfactorily addressed.

Dated: October 21, 2026
Miami, Florida

Respectfully submitted,

/s/ Andrew D. Zaron

Andrew D. Zaron (*Pro Hac Vice Motion Pending*)

Florida Bar No. 965790

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 21, 2026, a true and correct copy of the foregoing was filed electronically and served by CM/ECF on all parties who are currently on the list to receive email notice/service for this case.

/s/ Andrew D. Zaron
Andrew D. Zaron