

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JustFly Corp., *et al.*,

Debtors in a foreign proceeding.¹

Chapter 15

Case No. 20-11204 (JTD)

Jointly Administered

Re: Docket No. 48

**ORDER APPROVING NOTICING PROCEDURES FOR MOTION TO
RECOGNIZE AND ENFORCE PLAN OF ARRANGEMENT**

Upon the motion (the “**Motion**”)² of FlightHub Group Inc. (the “**Foreign Representative**”), in its capacity as the duly-appointed foreign representative for the above-captioned debtors (collectively, the “**Debtors**”), for the entry of an order, pursuant to sections 1525 and 1527 of the Bankruptcy Code and Bankruptcy Rule 2002, approving noticing procedures for the Foreign Representative’s Plan Recognition Motion; the Bankruptcy Court having the authority to grant the relief related herein and the relief requested herein being warranted; the Bankruptcy Court having determined that service of the U.S. Mail Notice, the CM/ECF Notice, and the Publication Notice, as set forth herein, will provide adequate notice to all parties that have an interest in the Plan Recognition Motion and after due deliberation and sufficient cause appearing therefor, for all of the foregoing reasons, **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The Plan Recognition Noticing Procedures are approved.

¹ The Debtors in the chapter 15 proceedings and the last four digits of their federal tax identification numbers are: JustFly Corp. (4113), FlightHub Group Inc. (9062), FlightHub Service Inc. (8072), JustFly Inc. (4194), SSFP Corp. (7744), and 11644670 Canada Inc. (2537). The location of the Debtors’ corporate headquarters and the Debtors’ foreign representative is: 3333 boul de la Côte-Vertu, Suite 600, Montreal / Saint-Laurent, Québec, Canada H4R 2N1.

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

3. The Foreign Representative shall serve the U.S. Mail Notice (including the Plan Recognition Motion and any exhibits attached thereto) on the following parties: (a) any party that filed a proof of claim in the Canadian Proceeding listing a mailing address in the United States; (b) any other creditor identified by the Debtors as having a mailing address in the United States, including any party with a United States address who was served with a proof of claim form by the Debtors in the Canadian Proceeding; and (c) any other party who has received notice by mail from the Foreign Representative of any previous filing in these Chapter 15 Cases.

4. The Foreign Representative shall file the U.S. Mail Notice (including the Plan Recognition Motion and any exhibits attached thereto) on the docket in the Chapter 15 Cases, which will cause service of such notice to parties who receive notice automatically via the Court's CM/ECF system in the Chapter 15 Cases.

5. The Foreign Representative shall publish the Publication Notice once in the USA Today newspaper at least fourteen days prior to the hearing on the Plan Recognition Motion.

6. Objections, if any, to the Plan Recognition Motion must: (a) be in writing; (b) state the name and address of the objecting party and the nature of the claim or interest of such party; (c) state with particularity the basis and nature of any objection; and (d) be filed, together with a proof of service, with the Bankruptcy Court and served so that they are received no later than 4:00 p.m. (prevailing Eastern time) on a date that is specified in the notice that is two weeks after service of the U.S. Mail Notice and publication of the Publication Notice on: (x) counsel for the Foreign Representative, McDonald Hopkins LLC, Attn: Marc Carmel, Esq., 300 North LaSalle Street, Suite 1400, Chicago, Illinois 60654 and Bielli & Klauder, LLC, Attn: David M. Klauder, Esq., 1204 N. King Street, Wilmington, Delaware 19801; and (y) the United States Trustee, Attn: Timothy Jay Fox, Jr., J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox #35, Wilmington, Delaware 19801.

7. Replies in support of the Plan Recognition Motion and in response to any objection to the Plan Recognition Motion shall be filed no later than 12:00 p.m. (prevailing Eastern time) on the date that is two business days prior to the hearing on the Plan Recognition Motion.

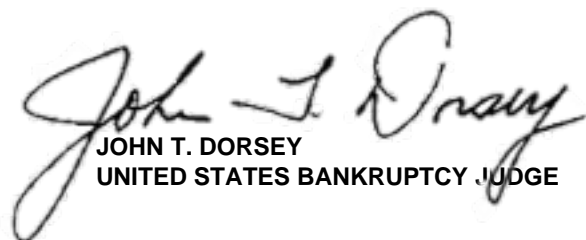
8. The hearing on the Plan Recognition Motion is scheduled for **April 28, 2021 at 2:00 p.m. (prevailing Eastern time)**, and may be continued from time to time without further notice other than the filing of a notice on the docket or the announcement of the adjourned date(s) at the hearing or any continued hearing.

9. The Foreign Representative is authorized to take all steps necessary or appropriate to carry out this order.

10. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this order.

11. Notwithstanding any applicability of any Bankruptcy Rules, the terms and conditions of this order shall be immediately effective and enforceable upon its entry.

Dated: March 29th, 2021
Wilmington, Delaware


JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE