

Hearing Date: October 27, 2015 at 10:00 a.m.
Objection Deadline: October 20, 2015 at 5:00 p.m.

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Proposed Special Corporate Counsel to the Debtor

Proposed General Bankruptcy and Restructuring Counsel to the Debtor

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
	: Chapter 7
AIRFASTTICKETS, INC.,	:
	:
	: Case No. 15-11951 (SHL)
Debtor.	:
	:
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**NOTICE OF DEBTOR’S MOTION TO CONVERT CHAPTER 7
CASE TO ONE UNDER CHAPTER 11 PURSUANT TO 11 U.S.C. § 706(a)**

PLEASE TAKE NOTICE that AirFastTickets, Inc., Delaware corporation, the debtor in the above-captioned case (the “Debtor”), through its undersigned proposed counsel, has filed a motion (the “Motion to Convert”) for entry of an order pursuant to 11 U.S.C. § 706(a),

converting the above captioned chapter 7 case to one under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion to Convert will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), Alexander Hamilton Custom House, One Bowling Green, Courtroom 701, New York, NY 10004, on **October 27, 2015 at 10:00 a.m.**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion to Convert must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Bankruptcy Rules for the Southern District of New York, must set forth the name of the objecting party, must state with particularity the basis for the objection and the specific grounds therefor, and must be filed with the Clerk of the Bankruptcy Court (with a courtesy copy delivered to Judge Lane’s Chambers) and served upon (a) proposed counsel to the Debtor; (b) counsel to Petitioning Creditors Kayak Software Corporation d/b/a KAYAK.com and Air Fast Ticket Limited, Duane Morris LLP, 1540 Broadway, New York, New York 10019 (Attn: William C. Heuer, Esq.), and 190 South LaSalle Street, Suite 3700, Chicago, IL 60603-3433 (Attn: John Robert Weiss, Esq.); (c) counsel to Petitioning Creditors TripAdvisor, LLC and Smarter Travel Media LLC, Goulston & Storrs, 400 Atlantic Avenue, Boston, MA 02110 (Attn.: Douglas B. Rosner, Esq.); (d) Geoffrey Carton-Kelly, Joint Administrator of Air Fast Ticket Limited c/o FRP Advisory LLP, 110 Cannon Street, London, EC4N 6EU; (e) the Office of the United States Trustee, 201 Varick Street, Room 1006, New York, NY 10014; and (f) all parties who have timely filed requests for notice under Bankruptcy Rule 2002, so as to be filed and actually received no later than **October 20, 2015 at 5:00 p.m.**

PLEASE TAKE FURTHER NOTICE that if no objection to the Motion to Convert is timely filed, served and received in accordance with this Notice, the Bankruptcy Court may grant the relief requested in the Motion to Convert without further notice or hearing.

Dated: September 21, 2015
New York, New York

ARENT FOX LLP

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