

Exhibit 1

Proposed Order

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

-----X	
In re:	:
	:
	: Chapter 11
AIRFASTTICKETS, INC.,	:
	:
	: Case No. 15-11951 (SHL)
Debtor.	:
----- X	

**ORDER UNDER RULE 2004 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE DIRECTING CITIBANK, N.A.,
TO APPEAR FOR ORAL EXAMINATION AND TO PRODUCE DOCUMENTS**

Upon the motion (the “Rule 2004 Motion”) of the debtor and debtor in possession (the “Debtor”) for entry of an order under section 105(a) of the Bankruptcy Code, Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 45 of the Federal Rules of Civil Procedure (the “Federal Rules”), which is made applicable to this bankruptcy case under Bankruptcy Rule 9016, and Rule 2004-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”) authorizing the Debtor to take discovery from Citibank, N.A. (the “Financial Institution”) and directing the Financial Institution to produce documents and to appear for an oral examination under oath; due and adequate notice of the Rule 2004 Motion having been given and no further notice being necessary; and sufficient cause appearing therefore, it is hereby

ORDERED, that the Rule 2004 Motion is **GRANTED**; and it is further

ORDERED, that under Bankruptcy Rules 2004 and 9016, the Debtor is hereby authorized and empowered to undertake the examination of the Financial Institution, under oath and consistent with the areas as set forth in Exhibit 2 to the Rule 2004 Motion, at a place and time to be agreed upon by the Debtor and the Financial Institution, and, if no such agreement is

possible, at a place and time set by the Debtor consistent with the applicable Bankruptcy Rules;
and it is further

ORDERED, that the Financial Institution is directed to produce the documents described in Exhibit 2 to the Motion or on any other request for documents, on a rolling basis, but in no event later than five (5) business days prior to the examination at the offices of Arent Fox LLP, 1675 Broadway, New York, NY 10019, attn: Michael S. Cryan, Esq. and George V. Utlik, Esq.;
and it is further

ORDERED, that service of a copy of this Order and the Rule 2004 Motion (without need for service of any subpoena, request for documents, or any other document, payment, or other matter) by hand delivery or overnight delivery upon the Financial Institution or its counsel, shall be deemed due and sufficient service and after execution of such service, the Financial Institution is directed to comply with the terms of this Order; and it is further

ORDERED, that, to the extent necessary, the Debtor, by and through counsel, is authorized to issue subpoenas or other process compelling the production of documents and appearance for examination of the Financial Institution consistent with the terms of this Order;
and it is further

ORDERED, that this Order is without prejudice to the rights of the Debtor to file further motions under Bankruptcy Rule 2004 seeking additional documents and testimony if warranted under the circumstances.

Dated: _____, 2016
New York, New York

UNITED STATES BANKRUPTCY JUDGE