

Michael S. Cryan  
George V. Utlik  
ARENT FOX LLP  
1675 Broadway  
New York, NY 10019  
Telephone: (212) 484-3900  
Facsimile: (212) 484-3990  
[michael.cryan@arentfox.com](mailto:michael.cryan@arentfox.com)  
[george.utlik@arentfox.com](mailto:george.utlik@arentfox.com)

Aram Ordubegian (admitted *pro hac vice*)  
Andy S. Kong (admitted *pro hac vice*)  
ARENT FOX LLP  
555 West Fifth Street, 48th Floor  
Los Angeles, CA 90013  
Telephone: (213) 629-7400  
Facsimile: (213) 629-7401  
[aram.ordubegian@arentfox.com](mailto:aram.ordubegian@arentfox.com)  
[andy.kong@arentfox.com](mailto:andy.kong@arentfox.com)

*General Bankruptcy and  
Restructuring Counsel to the Debtor*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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

**NOTICE OF PRESENTMENT OF MOTION FOR ENTRY OF AN ORDER  
AUTHORIZING THE DEBTOR TO TAKE DISCOVERY FROM PAYPAL, INC.,  
UNDER 11 U.S.C. § 105(a) AND RULE 2004 OF THE FEDERAL RULES OF  
BANKRUPTCY PROCEDURE AND OPPORTUNITY FOR HEARING**

**PLEASE TAKE NOTICE** that upon the annexed motion of Airfasttickets, the above-captioned debtor and debtor in possession (the “Debtor”), the undersigned will present the attached proposed order to the Honorable Sean H. Lane, United States Bankruptcy Judge of the

United States Bankruptcy Court for the Southern District of New York (the “Court”), at One Bowling Green, New York, NY 10004, for signature on **July 1, 2016 at 12:00 noon (ET)**.

**PLEASE TAKE FURTHER NOTICE** that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge’s chambers at least three (3) days before the date of presentment, there will not be a hearing and the order may be signed.

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, must be served by U.S. mail, overnight delivery, hand delivery or, with the exception of the Court and the United States Trustee, electronic mail upon each of the following: (a) the attorneys for the Debtor, (i) Arent Fox LLP, 1675 Broadway, New York, New York 10019-5820 (Attn: George V. Utlik, Esq.), and (ii) Arent Fox LLP, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013 (Attn: Aram Ordubegian, Esq. and Andy S. Kong, Esq.); (b) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Andrea B. Schwartz, Esq.); (c) all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002; and (d) PayPal, Inc., c/o CT Corporation System, 111 Eighth Avenue, New York, New York 10011, so as to be actually received no later than **June 28, 2016 at 11:30 a.m. (ET)**.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party’s obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE** that the ECF docket number to which the filing  
relates shall be included in the upper right hand corner of the caption of all objections.

Dated: June 14, 2016  
New York, New York

**ARENT FOX LLP**

By: /s/ Michael S. Cryan  
Michael S. Cryan  
George V. Utlik  
1675 Broadway  
New York, New York 10019  
Telephone: (212) 484-3900  
Facsimile: (212) 484-3990  
[michael.cryan@arentfox.com](mailto:michael.cryan@arentfox.com)  
[george.utlik@arentfox.com](mailto:george.utlik@arentfox.com)

Aram Ordubegian  
(admitted *pro hac vice*)  
Andy S. Kong  
(admitted *pro hac vice*)  
555 West Fifth Street, 48th Floor  
Los Angeles, CA 90013  
Telephone: (213) 629-7400  
Facsimile: (213) 629-7401  
[aram.ordubegian@arentfox.com](mailto:aram.ordubegian@arentfox.com)  
[andy.kong@arentfox.com](mailto:andy.kong@arentfox.com)

*General Bankruptcy and Restructuring Counsel to  
the Debtor*