

Hearing Date: August 11, 2016 at 2:00 p.m. (EST)  
Objection Deadline: August 4, 2016 at 5:00 p.m. (EST)

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*General Bankruptcy and Restructuring Counsel  
to the Debtor*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
AIRFASTTICKETS, INC.,	: Case No. 15-11951 (SHL)
Debtor.	:
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**NOTICE OF MOTION OF THE DEBTOR FOR AN ORDER (I) APPROVING ITS DISCLOSURE STATEMENT, (II) ESTABLISHING PLAN SOLICITATION AND VOTING PROCEDURES, (III) SCHEDULING A CONFIRMATION HEARING, AND (IV) ESTABLISHING NOTICE AND OBJECTION PROCEDURES FOR CONFIRMATION OF THE DEBTOR’S CHAPTER 11 PLAN OF LIQUIDATION**

**PLEASE TAKE NOTICE** that the undersigned, on behalf of the above-captioned debtor in possession (collectively, the “**Debtor**”), will move this Court to grant the motion seeking, among other things, approval of the disclosure statement (the “**Disclosure Statement**”) in respect of its chapter 11 plan of liquidation, (the “**Motion**”) at a hearing before the Honorable Sean H. Lane, Chief United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 (the “**Bankruptcy Court**”) on **August 11, 2016 at 2:00 p.m.** (prevailing Eastern Time) (the “**Disclosure Statement Hearing**”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion 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) the attorneys for the Debtor, (i) Arent Fox LLP, 1675 Broadway, New York, New York 10019-5820 (Attn: George V. Utlik, Esq.), (ii) Arent Fox LLP, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013 (Attn: Aram Ordubegian, Esq. and Andy S. Kong, Esq.) and (iii) Richards, Layton & Finger, P.A., 920 North King Street, Wilmington, Delaware 19801 (Attn: Russell C. Silberglied, 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, so as to be filed and actually received no later than **August 4, 2016 at 5:00 p.m. (prevailing Eastern Time)** (the “**Disclosure Statement Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that the objecting parties are required to attend the Disclosure Statement Hearing, and failure to appear may result in relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE** that the Motion, the proposed Disclosure Statement and Plan shall be made available on the website established for this chapter 11 case [www.bmcgroup.com/airfasttickets](http://www.bmcgroup.com/airfasttickets).

**PLEASE TAKE FURTHER NOTICE** that if you believe you are a party in interest and would like a copy of the Disclosure Statement and Plan, please contact the Claims Agent, BMC Group, Inc., by telephone at (888) 909-0100. Copies of the Disclosure Statement and Plan will be provided on a CD-ROM, unless a party specifically requests paper copies of such documents.

**PLEASE TAKE FURTHER NOTICE** that the Disclosure Statement Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Bankruptcy Court of such adjournment on the date scheduled for the hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtor with the Bankruptcy Court.

Dated: July 11, 2016  
New York, New York

**ARENT FOX LLP**

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