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Counsel for Adam Meislik, Liquidating Trustee
of Airfasttickets, Inc.

**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. :
:
-----X

**NOTICE OF ERRATA TO LIQUIDATING TRUSTEE'S MOTION FOR AN ORDER
AUTHORIZING THE PRODUCTION OF DOCUMENTS OF BDO, LLP PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

PLEASE TAKE NOTICE that *Motion for an Order Authorizing the Production of Documents of BDO, LLP Pursuant to Federal Rule of Bankruptcy Procedure 2004* (the "Motion") was filed and served with an incorrect Exhibit to the Subpoena. The correct Exhibit to the Subpoena is attached hereto.

DATED: June 19, 2017

LOBEL WEILAND GOLDEN FRIEDMAN LLP

By: /s/ Reem J. Bello
Counsel for Adam Meislik, Liquidating
Trustee

EXHIBIT "1"

A. DEFINITIONS

1. The rules of construction and definitions in Civil Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, which is made applicable under Local Rule 2004-1, are hereby incorporated by reference.

2. "The Debtor" means Airfasttickets, Inc., the debtor in a bankruptcy case currently pending in the United States Bankruptcy Court, Southern District of New York, identified as case number 15-11951(SHL).

3. Communication. The term communication means the transmittal of information in the form of facts, ideas, inquiries or otherwise, in any medium, including but not limited to paper and email correspondence.

4. Document. The term "document" is synonymous in meaning and equal in scope to the usage of the term "documents or electronically stored information" in Fed. R. Civ. P. 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of the term.

5. Identify (with respect to persons). When referring to a person, "to identify" means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

6. Identify (with respect to documents). When referring to documents, "to identify" means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s) and recipients(s). In the alternative, the responding party may produce the documents, together with identifying information sufficient to satisfy Fed. R. Civ. P. 33(d).

1 7. Parties. The terms "plaintiff" and "defendant" as well as a party's full or
2 abbreviated name or a pronoun referring to a party mean the party and, where applicable,
3 its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.
4 This definition is not intended to impose a discovery obligation on any person who is not a
5 party to the litigation.

6 8. Person. The term "person" is defined as any natural person or any legal
7 entity, including, without limitation, any business or governmental entity or association.

8 9. Concerning. The term "concerning" means relating to, referring to,
9 describing, evidencing or constituting.

10 10. All/Any/Each. The terms "all," "any," and "each" shall each be construed as
11 encompassing any and all.

12 11. And/Or. The connectives "and" and "or" shall be construed either
13 disjunctively or conjunctively as necessary to bring within the scope of the discovery
14 request all responses that might otherwise be construed to be outside of its scope.

15 12. You or Your. The terms "You" or "Your" means BDO, LLP, or its affiliates or
16 any other Person or Persons acting on its behalf or at its request, including, without
17 limitation, employees, agents, attorneys, accountants, bookkeepers, and/or tax return
18 preparers.

19 13. "Consolidated Financial Statements" means the consolidated balance
20 sheets of Debtor, and its Subsidiaries and the related consolidated statements of
21 operations, comprehensive loss, stockholders' deficit, and cash flows.

22 **B. INSTRUCTIONS**

23 1. If in Your response to a request You decline or fail to produce any item
24 based upon a claim of privilege, state with respect to each such document:

- 25 (a) The title or the nature of the document (e.g., letter, memorandum,
26 telegram, etc.);
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1 (b) The date and number of pages of the Document, and any
2 attachments or appendages to the Document;

3 (c) The identity of the persons or persons who drafted, composed and/or
4 originated the Document;

5 (d) The identity of the person or persons, if any, to whom the original and
6 each copy of the Document was sent, distributed, shown or displayed;

7 (e) The contents of the item in sufficient detail to enable the Court and
8 the Trustee to ascertain whether the Document is privileged; and

9 (f) The name and address of each person who presently has custody of
10 the original or copy of the item.

11 2. If any Document falling in the category of the Documents called for by a
12 request has been destroyed or discarded, state with respect to each such item the
13 information requested by subparagraphs (a)-(f) of paragraph (1) above and, in addition,
14 supply the following information:

15 (a) The date on which the item was destroyed or discarded, the manner
16 in which it was destroyed or discarded, and the reason it was destroyed or
17 discarded;

18 (b) The identity of the person or persons who authorized and/or carried
19 out the destruction or discarding of the item.

20 3. Different versions of the same Documents, handwritten notes, or notations in
21 any form, draft documents, and documents with handwritten notations or marks not found
22 in the original or on other copies are considered to be different documents for the purpose
23 of production in compliance with these requests, and each form should be produced
24 separately.

25 4. All Documents and things produced in response to these requests shall be
26 produced in toto notwithstanding the fact that portions thereof may contain information not
27 requested.

1 5. All Documents and things produced in response to these requests shall be
2 produced along with any and/or all attachments and/or enclosures as have ever been
3 attached to and/or enclosed with the document at any time.

4 6. If any of these Documents cannot be produced in full, produce them to the
5 fullest extent possible, specifying clearly the reasons for the inability to produce the
6 remainder and stating whatever information, knowledge, or belief You have concerning
7 the unproduced portion.

8 7. These requests are specifically intended to include, but not be limited to, any
9 and/or all Documents and things in Your possession, custody, or control, or in the
10 possession, custody, or control of any of Your attorneys, accountants, bankers, brokers,
11 employees, agents, subsidiaries, affiliates, and representatives (including the personal
12 files of all the aforementioned), wherever such documents are located, both within and
13 outside the United States.

14 8. If a Document is called for by more than one paragraph of this request,
15 produce the item only once.

16 9. When items are produced in response to a request, indicate to which
17 paragraph or paragraphs the item responds.

18 10. All singular nouns or pronouns include the plural and the plural includes the
19 singular. Any pronoun includes the masculine, feminine and neuter genders, as it is in
20 each case appropriate.

21 11. The words "and" and "or" shall be each construed both conjunctively and
22 disjunctively and each shall include the other.

23 12. These requests shall be deemed continuing and You shall promptly supply,
24 by way of supplemental responses, any and all Documents or things that may come into
25 existence or Your possession prior to the trial of the adversary proceeding which is
26 additionally responsive or necessary to maintain the accuracy of the responses previously
27 served.

REQUEST FOR DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

All Documents referring or relating to any major accounting or auditing issues You addressed with Debtor prior to your appointment to perform an audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and 2013.

REQUEST FOR PRODUCTION NO. 2:

All Documents referring or relating to a condition of your retention by You prior to Your engagement by Debtor to perform an audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and 2013.

REQUEST FOR PRODUCTION NO. 3:

All Documents which evidence the scope of Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and 2013.

REQUEST FOR PRODUCTION NO. 4:

All Documents which evidence the Subsidiaries or activities that were not audited that would have presented operational financial risks to the Debtor during Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and 2013, but were not considered material.

REQUEST FOR PRODUCTION NO. 5:

All Documents which You relied upon to detect material errors, fraud, illegal acts or material weaknesses in Your internal control Relating to Your audit of the Consolidated

Lobel Weiland Golden Freidman LLP
650 Town Center Drive, Suite 950
Costa Mesa, California 92626
Tel 714-888-1000 Fax 714-888-1002

1 Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and
2 2013.

3 **REQUEST FOR PRODUCTION NO. 6:**

4 All Documents which evidence Your areas of concern of the Debtor that were not
5 audited or reviewed due to budget or other limitations Relating to Your audit of the
6 consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011
7 and 2012.

8 **REQUEST FOR PRODUCTION NO. 7:**

9 All Documents Your received from Debtor which evidence Your areas of concern of
10 the Debtor that were not audited or reviewed due to budget or other limitations Relating to
11 Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the
12 fiscal years 2011, 2012 and 2013.

13 **REQUEST FOR PRODUCTION NO. 8:**

14 All Documents which evidence, constitute or refer to Your areas of concern of the
15 Debtor that were not audited or reviewed due to budget or other limitations Relating to
16 Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the
17 fiscal years 2011, 2012 and 2013.

18 **REQUEST FOR PRODUCTION NO. 9:**

19 All Documents which evidence, constitute or refer to the amounts and disclosures e
20 You received from Debtor which may evidence Your areas of concern of the Debtor that
21 were not audited or reviewed due to budget or other limitations Relating to Your audit of
22 the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years
23 2011, 2012 and 2013.

24 **REQUEST FOR PRODUCTION NO. 10:**

25 All Documents which evidence, constitute or refer to the amounts and disclosures
26 You received from Debtor which may evidence Your areas of concern of the Debtor that
27 were not audited or reviewed due to budget or other limitations Relating to Your audit of
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1 the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years
2 2011, 2012 and 2013.

3 **REQUEST FOR PRODUCTION NO. 11:**

4 All Documents which evidence, constitute or refer to Your evaluation of the overall
5 presentation of the Consolidated Financial Statements of Debtor and its Subsidiaries for
6 the fiscal years 2011, 2012 and 2013.

7 **REQUEST FOR PRODUCTION NO. 12:**

8 All Documents which evidence, constitute or refer to the amounts and disclosures
9 which support your opinion that Consolidated Financial Statements of Debtor and its
10 Subsidiaries for the fiscal years 2011, 2012 and 2013 present fairly, in all material
11 respects, the financial position of the Debtor and its Subsidiaries as of December 31, 2013
12 and 2012, and the results of Debtor's operations and its cash flows for each of the two
13 years.

14 **REQUEST FOR PRODUCTION NO. 13:**

15 All Communications referring or relating to any major accounting or auditing issues
16 You addressed with Debtor prior to your appointment to perform an audit of the
17 Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years
18 2011, 2012 and 2013.

19 **REQUEST FOR PRODUCTION NO. 14:**

20 All Communications referring or relating to a condition of your retention by You
21 prior to Your engagement by Debtor to perform an audit of the Consolidated Financial
22 Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and 2013.

23 **REQUEST FOR PRODUCTION NO. 15:**

24 All Communications which evidence the scope of Your audit of the Consolidated
25 Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011, 2012 and
26 2013.

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1 **REQUEST FOR PRODUCTION NO. 16:**

2 All Communications which evidence the Subsidiaries or activities that were not
3 audited that would have presented operational financial risks to the Debtor during Your
4 audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal
5 years 2011, 2012 and 2013, but were not considered material.

6 **REQUEST FOR PRODUCTION NO. 17:**

7 All Communications which You relied upon to detect material errors, fraud, illegal
8 acts or material weaknesses in Your internal control Relating to Your audit of the
9 Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years
10 2011, 2012 and 2013.

11 **REQUEST FOR PRODUCTION NO. 18:**

12 All Communications which evidence Your areas of concern of the Debtor that were
13 not audited or reviewed due to budget or other limitations Relating to Your audit of the
14 Consolidated Financial Statements of Debtor and its Subsidiaries for the fiscal years 2011
15 and 2012.

16 **REQUEST FOR PRODUCTION NO. 19:**

17 All Communications Your received from Debtor which evidence Your areas of
18 concern of the Debtor that were not audited or reviewed due to budget or other limitations
19 Relating to Your audit of the Consolidated Financial Statements of Debtor and its
20 Subsidiaries for the fiscal years 2011, 2012 and 2013.

21 **REQUEST FOR PRODUCTION NO. 20:**

22 All Communications which evidence, constitute or refer to Your areas of concern of
23 the Debtor that were not audited or reviewed due to budget or other limitations Relating to
24 Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the
25 fiscal years 2011, 2012 and 2013.

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1 **REQUEST FOR PRODUCTION NO. 21:**

2 All Communications which evidence, constitute or refer to the amounts and
3 disclosures You received from Debtor which may evidence Your areas of concern of the
4 Debtor that were not audited or reviewed due to budget or other limitations Relating to
5 Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the
6 fiscal years 2011, 2012 and 2013.

7 **REQUEST FOR PRODUCTION NO. 22:**

8 All Communications which evidence, constitute or refer to the amounts and
9 disclosures You received from Debtor which may evidence Your areas of concern of the
10 Debtor that were not audited or reviewed due to budget or other limitations Relating to
11 Your audit of the Consolidated Financial Statements of Debtor and its Subsidiaries for the
12 fiscal years 2011, 2012 and 2013.

13 **REQUEST FOR PRODUCTION NO. 23:**

14 All Communications which evidence, constitute or refer to Your evaluation of the
15 overall presentation of the Consolidated Financial Statements of Debtor and its
16 Subsidiaries for the fiscal years 2011, 2012 and 2013.

17 **REQUEST FOR PRODUCTION NO. 24:**

18 All Communications which evidence, constitute or refer to the amounts and
19 disclosures which support your opinion that Consolidated Financial Statements of Debtor
20 and its Subsidiaries for the fiscal years 2011, 2012 and 2013 present fairly, in all material
21 respects, the financial position of the Debtor and its Subsidiaries as of December 31, 2013
22 and 2012, and the results of Debtor's operations and its cash flows for each of the two
23 years.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 950, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF ERRATA TO LIQUIDATING TRUSTEE'S MOTION FOR AN ORDER AUTHORIZING THE PRODUCTION OF DOCUMENTS OF BDO, LLP PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 20, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **June 20, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **June 20, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 20, 2017
Date

Kelly Adele
Printed Name

/s/ Kelly Adele
Signature

VIA U.S. MAIL

Iain Henderston
BDO
55 Baker Street
London W1U 7EU

BDO
Attn: President
600 Anton Boulevard, Suite 500
Costa Mesa, CA 92626

Electronic Mail Notice List

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