

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

_____	x	
In re:)	
)	Chapter 11
Airfasttickets, Inc.,)	
)	Case No. 15-11951 (SHL)
Debtor.)	
_____	x	
Adam Meislik, as Liquidating Trustee of the)	
Liquidating Trust of Airfasttickets, Inc.,)	
)	Adv. Proc. No. 16-01207 (SHL)
Plaintiff,)	
v.)	
)	
Frank Ferro, Nikolaos Koklonis, and Eleni Vareli,)	
)	
Defendants.)	
_____	x	
The Liquidating Trust of Airfasttickets, Inc.,)	
)	Adv. Proc. No. 16-01040 (SHL)
Plaintiff,)	
v.)	
)	
Citibank N.A. and Nikolaos Koklonis)	
)	
Defendants.)	
_____	x	

**MEDIATION STATUS LETTER AND
REQUEST FOR ADJOURNMENT OF PENDING HEARINGS**

TO: THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE:

As Your Honor may recall, on August 31, 2017, this Court entered an order referring to mediation the following disputes involving Adam Meislik, as Trustee of the Airfasttickets, Inc. Liquidating Trust (the “Liquidating Trustee”), on the one hand, and Frank Ferro, Nikolaos Koklonis and Eleni Vareli (the “Defendants”; and together with the Liquidating Trustee, the “Parties”), on the other hand: (i) the adversary proceeding entitled *Meislik v. Ferro*,

et al., Adv. Proc. No. 16-01207 (SHL) (the “Ferro Adversary”); (ii) the adversary proceeding entitled *Airfasttickets, Inc. v. Citibank, N.A., et al.*, Adv. Proc. No. 16-01040 (SHL) (the “Citibank Adversary”); and (iii) in connection with the above-captioned main bankruptcy case (the “Bankruptcy Case”), the *Objection to Proof of Claim Filed by Nikolaos Koklonis* (the “Claim Objection”) [Docket No. 216] filed by Airfasttickets, Inc. (the “Debtor”), the *Motion for Payment of Administrative Expense* (the “Administrative Claim”) [Docket No. 261] filed by Mr. Koklonis, and all other claims asserted by Mr. Koklonis (collectively, the “Koklonis Claim Disputes”), and appointing Jed D. Melnick, Esq., of JAMS, as mediator (the “Mediator”).

On September 28, 2017, the Parties, together with the Defendants’ insurance carrier, participated in a mediation session conducted by the Mediator. While the Parties were unable reach an agreement at that session, they have continued to work with the Mediator towards a global settlement. The Parties are pleased to report that they have reached an agreement in principle on a settlement that will—subject to finalizing a mutually acceptable settlement agreement and approval of the Court—resolve all disputes among the Parties, including both adversary proceedings and each of the Koklonis Claim Disputes. The Parties are currently in the process of drafting a settlement agreement to memorialize the global settlement, and plan on filing a Bankruptcy Rule 9019 motion seeking approval of the settlement agreement before the end of this month, which motion shall be noticed for hearing before the end of next month.

In light of these developments, the Parties respectfully request that the Court adjourn all hearings in connection to the Ferro Adversary, the Citibank Adversary, and the Koklonis Claim Disputes, including the hearings currently scheduled for November 21, 2017, to a date after the date scheduled for a hearing on the 9019 motion.

Thank you for your consideration of this request and your ongoing patience with respect to these matters.

Respectfully,

Dated: November 14, 2017

/s/ John Reitman

John Reitman, Esq.

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Airfasttickets, Inc. Liquidating Trust*

/s/ Jeremy Sussman

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