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*Attorneys for the Liquidating Trustee*

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

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In re:	:
	:
	: Chapter 11
AIRFASTTICKETS, INC.,	:
	:
Debtor.	: Case No. 15-11951 (SHL)
	:
	:
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**LIQUIDATING TRUSTEE’S EX PARTE MOTION FOR  
ORDER SHORTENING TIME, LIMITING NOTICE, AND SCHEDULING HEARING**

Adam Meislik (the “Liquidating Trustee”), as Trustee of the Airfasttickets, Inc. Liquidating Trust, successor in interest to AirFastTickets, Inc., by and through his undersigned counsel, hereby submits this *ex parte* motion (the “Motion to Shorten Time”) seeking entry of an order scheduling a hearing on December 20, 2017, at 10:00 a.m., and shortening the notice period with respect to the Liquidating Trustee’s concurrently-filed *Liquidating Trustee’s Motion for Approval of Settlement of Claims Among the Liquidating Trust of Airfasttickets, Inc., Nikolaos Koklonis, Frank Ferro, Eleni Vareli, and National Union Fire Insurance Company of Pittsburgh, Pa.* (the “Settlement Motion”), and respectfully represents:

**RELIEF REQUESTED**

1. By this Motion to Shorten Time, the Liquidating Trustee respectfully requests, pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy”

Rules”), that the Court shorten the notice period by two (2) days and set the Settlement Motion for a hearing on December 20, 2017, at 10:00 a.m. A proposed order is attached hereto as Exhibit 1.

**BASIS FOR RELIEF REQUESTED**

2. Bankruptcy Rule 2002(a)(3) provides that a trustee must provide 21 days’ notice of the hearing on a motion for approval of a compromise. Bankruptcy Rule 9006(c) authorizes the Court, for cause shown, to reduce the notice period. The Liquidating Trustee submits that cause exists to shorten the notice period with respect to the Settlement Motion as requested herein.

3. As set forth more fully in the Settlement Motion, the Liquidating Trustee seeks an order approving the Settlement Agreement and Claim Release (the “Settlement Agreement”), which resolves all claims and causes of action asserted, and assertible, between the Liquidating Trustee on one hand, and Frank Ferro, Nikolaos Koklonis, Eleni Vareli (collectively, the “Individual Defendants”) and National Union Fire Insurance Company of Pittsburgh, Pa., on the other hand.

4. The Liquidating Trustee and the Individual Defendants previously reserved December 20, 2017, as the date of the hearing on the Settlement Motion. Based on that hearing date, the deadline to file the Settlement Motion was November 29, 2017. However, despite their best efforts, the parties were not able to collect all signatures to the Settlement Agreement until November 30, 2017.

5. Under the circumstances, the Liquidating Trustee respectfully submits that a shortening of the notice period for the Settlement Motion by two (2) days is necessary and appropriate. Approval of the Settlement Motion will result in a payment of \$4,400,000 to the

Liquidating Trust, as well as the elimination of millions of dollars in claims asserted by Koklonis. In light of this benefit to the Liquidating Trust and its beneficiaries, the Liquidating Trustee submits that good cause exists for expedited consideration of the Settlement Motion.

6. No previous application for similar relief has been made.

**CONCLUSION**

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter an order, in the form attached hereto as Exhibit 1, granting the Motion to Shorten Time, shortening the notice period on the Settlement Motion by two (2) days, and scheduling a hearing on the Settlement Motion on December 20, 2017, at 10:00 a.m., and granting such relief as this Court deems just and proper.

Dated: December 1, 2017

By: /s/ Roye Zur  
John P. Reitman, *Pro Hac Vice*  
Roye Zur, *Pro Hac Vice*  
Jack A. Reitman, *Pro Hac Vice*

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