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

In re:

AIRFASTTICKETS, INC.,

Debtor.

Chapter 11
Case No. 15-11951 (SHL)

**LIMITED RESPONSE AND RESERVATION OF RIGHTS OF HNA
TO MOTION FOR ORDER AUTHORIZING
FAREPORTAL INC. TO (A) CONDUCT A 2004 EXAMINATION OF
TRAVANA, INC. AND (B) SEEK RELATED DOCUMENT PRODUCTION**

HNA Group (International) Co., Ltd. and HNA Capital Ltd., (collectively, “**HNA**”), by and through its undersigned counsel, Hogan Lovells US LLP, files this limited response and reservation of rights (the “**Response**”) to the *Motion for Order Authorizing Fareportal Inc. (“Fareportal”) to (A) Conduct a 2004 Examination of Travana, Inc. (“Travana”) and (B) Seek Related Document Production* [Dkt. 366] (the “**2004 Motion**”). Capitalized terms used but not defined herein shall have such meanings ascribed to them in the 2004 Motion. In support of this Response HNA respectfully represents as follows:

Background

1. On April 17, 2017, an involuntary bankruptcy petition was filed against Travana in the United States Bankruptcy Court for the Northern District of California by, among other petitioning creditors, Jason Chen.

2. On July 31, 2017, AirTourist Holdings, LLC, Mr. Chen, and Edgar Park (collectively, the “**Chen Group**”) filed a complaint in San Francisco Superior Court against HNA, members of Travana’s Board of Directors, and other Defendants (the “**Shareholder Lawsuit**”). The Shareholder Lawsuit was subsequently removed to District Court and the District Court subsequently ordered the Shareholder Lawsuit to arbitration, which is now pending in the arbitration referenced as “Airtourist Holdings, LLC, [et al.], v. HNA Group, [et al.]”, ICDR [American Arbitration Association] Case No. 01-18-0001-7018 (the “**Arbitration**”).

Limited Response to 2004 Motion and Reservation of Rights

3. HNA understands that Fareportal has previously sought discovery of certain members of the Chen Group through the Travana bankruptcy proceeding and understands the purpose behind this 2004 Motion to continue related discovery. However, due to the ongoing nature of the Arbitration, HNA is compelled to file this limited response to the 2004 Motion.

4. HNA has been working with Travana’s Chapter 7 Trustee to maintain Travana’s data accounts, including, but not limited to, Travana’s Amazon Web Services Account (collectively, the “Travana Accounts”), that hold Travana’s data and intellectual property that is potentially relevant to the ongoing Arbitration.

5. While HNA does not object to Fareportal seeking discovery from Travana, it is imperative that HNA continue to have access to the Travana Accounts in connection with the ongoing Arbitration. Additionally, if Fareportal is provided access to the Travana Accounts pursuant to any order approving the 2004 Motion, Fareportal must not be permitted take any

action that damages or alters the data inside the Travana Accounts, as that data remains the subject of the ongoing Arbitration.

6. To the extent that Fareportal intends to use the order approving the 2004 Motion to take any action to limit HNA's access to the Travana Accounts or to alter the data in the Travana Accounts, HNA respectfully objects to the 2004 Motion and reserves the right to seek further relief from the Bankruptcy Court.

Dated: February 21, 2019
New York, New York

Respectfully submitted,

By: /s/ Peter Ivanick
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