

EXHIBIT A
Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
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AIRFASTTICKETS, INC.,	:
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	:
Debtor.	:
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**ORDER AUTHORIZING TERMINATION OF
RETENTION OF THE CLAIMS AND NOTICING AGENT**

Upon the *Liquidating Trust’s Application for Entry of an Order Authorizing Termination of Retention of Claims and Noticing Agent* [Docket No. •] (the “Application”)¹ for an order authorizing the Liquidating Trust to terminate retention of BMC Group, Inc. (the “Claims Agent”), the claims and noticing agent for this Chapter 11 Case, which was retained by the Debtor pursuant to this Bankruptcy Court’s Order dated December 2, 2015 [Docket No. 68] and which assumed full responsibility for noticing, processing of claims, preparation and maintenance of a claims register and providing custody of all proofs of claim; and the Bankruptcy Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the Bankruptcy Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Bankruptcy Court having found that the venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and upon consideration of the Application made in consultation with the Clerk of Court after having determined that the requirement for the Claims Agent no longer exists in this Chapter 11 Case; and the Bankruptcy Court having found that the relief requested in the Application is in the best interests of the Debtor’s estate, its creditors and other parties in interest; and the Bankruptcy Court having found that the Liquidating Trust’s notice of the Application and opportunity for a hearing on the Application was appropriate and no other notice need be provided; and the Bankruptcy Court having reviewed the Application; and the Bankruptcy Court having

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

determined that the legal and factual bases set forth in the Application and at any hearing on the Application establish just cause for the relief granted herein; and upon each of the Bar Dates having passed, the latest of which was November 25, 2016; and upon all of the proceedings had before the Bankruptcy Court; and after due deliberation and sufficient cause appearing therefor; it is hereby

ORDERED that the services of the Claims Agent are terminated effective thirty days from the entry of this Order (the "Termination Date"); and it is further

ORDERED that the Claims Agent will prepare final claims register the Debtor's Chapter 11 Case for the Clerk's Office, pursuant to the current guidelines implementing under 28 U.S.C. § 156(c); and it is further

ORDERED that the Claims Agent will box and transport all claims to the Federal Archives, at the direction of the Clerk's Office; and it is further

ORDERED that the Claims Agent will keep electronic copies of all records until one year after the Termination Date and that the Claims Agent need not keep paper copies of such records; and it is further

ORDERED that the Claims Agent will transfer electronic copies of the final claims register, all claims and claim related documents and filings to the Liquidating Trust; and it is further

ORDERED that the above services to be rendered by the Claims Agent shall be charged to the Debtor's estate and the Claims Agent is permitted to draw down on the Retainer to satisfy such charges; and it is further

ORDERED that upon completion of the above services, the Claims Agent shall return to the Liquidating Trust any portion of the Retainer that remains undrawn; and it is further

[Remainder of the page intentionally left blank.]

ORDERED that the Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or enforcement of this Order.

DATED: March __, 2021
New York, New York

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE