

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.,	:
	:
	:
Debtor.	:
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FINAL DECREE AND ORDER CLOSING CHAPTER 11 CASE

Upon the *Motion for an Order Entering Final Decree and Closing the Chapter 11 Case* [Docket No. •] (the “Motion”)⁴ for entry of an order pursuant to section 350(a) of the Bankruptcy Code, Bankruptcy Rule 3022, and Local Rules 3022-1 and 9074-1, closing the above captioned Chapter 11 Case; and it appearing that this Bankruptcy Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and section 11.1(u) of the Plan; and it appearing that venue of these Cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Bankruptcy Court having determined that the relief requested in the Motion is in the best interests of the Debtor and Liquidating Trust, their estate, their creditors and other parties in interest; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED the Motion is GRANTED as provided herein; and it is further

ORDERED that entry of this final decree is without prejudice to the rights of any party in interest to seek to reopen this Chapter 11 Case for cause shown, and the Bankruptcy Court shall retain jurisdiction as is provided in Article XI of the Plan; and it is further

ORDERED that the terms and conditions of this Order are effective immediately upon its entry; and it is further

⁴ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

ORDERED that the Liquidating Trust shall pay to the U.S. Trustee any quarterly fees which are due and payable, or become due and payable, if any, pursuant to 28 U.S.C. § 1930(a)(6) within thirty (30) days of such fees being due and any overpayment, if any, will be refunded to the Liquidating Trust of the filing of the final quarterly report; and it is further

ORDERED that, pursuant to the requirement of Rule 3022-1 of the Local Rules, a closing report with respect to the Chapter 11 Case shall be filed and served upon the U.S. Trustee within fourteen (14) days after the Liquidating Trust is fully administered; and it is further

ORDERED that this 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