

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>DAVID B. FARKAS (SBN 257137) david.farkas@us.dlapiper.com JOHN K. LYONS (<i>Pro Hac Vice</i>) john.lyons@us.dlapiper.com DLA PIPER LLP (US) 2000 Avenue of the Stars Suite 400 North Tower Los Angeles, California 90067-4704 Tel.: (310) 595-3000 Fax: (310) 595-3300</p> <p><i>Attorneys for: Jonathan D. King Chapter 7 Trustee</i></p>	<p>FOR COURT USE ONLY</p>
<p><b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION</b></p>	
<p>In re:</p> <p>ZETTA JET USA, INC., et al.,</p> <p>Jointly Administered with ZETTA JET PTE, LTD Case No. 2:17-bk-21387-SK</p> <p style="text-align: right;">Debtors.</p>	<p>CASE NO.: 2:17-bk-21386-SK CHAPTER: 7 ADV. PROC. NO. 2:19-ap-01147-SK</p>
<p>In re:</p> <p>JONATHAN D. KING, solely in his capacity as Chapter 7 Trustee of Zetta Jet USA, Inc. and Zetta Jet PTE, Ltd.</p> <p style="text-align: right;">Plaintiff,</p> <p>CAVIC AVIATION LEASING (IRELAND) 22 CO. DESIGNATED ACTIVITY CO., et al.</p> <p style="text-align: right;">Defendants.</p>	<p><b>NOTICE OF LODGMENT OF ORDER (1) GRANTING TRUSTEE’S MOTION TO FILE UNREDACTED PROPOSED AMENDED COMPLAINT AND REDLINE UNDER SEAL AND (2) AUTHORIZING FILING OF FIRST AMENDED COMPLAINT UNDER SEAL</b></p> <p><u>Hearing:</u> Date: July 14, 2021 Time: 9:00 a.m. (PDT) Place: Courtroom 1575 255 East Temple Street Los Angeles, CA 90012</p>

PLEASE TAKE NOTE that the order titled **Order Granting Trustee’s Motion to File Unredacted Proposed Amended Complaint and Redline Under Seal and (2) Authorizing Filing of First Amended Complaint Under Seal** was lodged on July 16, 2021 and is attached. This order relates to **docket number 243**.

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20 Attorneys for Jonathan D. King as Chapter 7 Trustee

21 **UNITED STATES BANKRUPTCY COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA**  
23 **LOS ANGELES DIVISION**

24 In re:  
25 ZETTA JET USA, INC., a California  
26 corporation,  
27 Debtor.

24 Lead Case No.: 2:17-bk-21386-SK  
25 Chapter 7  
26 Jointly Administered With:  
27 Case No.: 2:17-bk-21387-SK

28 In re:  
29 ZETTA JET PTE, LTD., a Singaporean  
30 corporation,  
31 Debtor.

28 Adv. Proc. No. 2:19-ap-01147-SK  
29 **ORDER (1) GRANTING TRUSTEE'S**  
30 **MOTION TO FILE UNREDACTED**  
31 **PROPOSED AMENDED COMPLAINT**  
**AND REDLINE UNDER SEAL AND**  
**(2) AUTHORIZING FILING OF FIRST**  
**AMENDED COMPLAINT UNDER SEAL**

32 JONATHAN D. KING, solely in his capacity  
33 as Chapter 7 Trustee of Zetta Jet USA, Inc. and  
34 Zetta Jet PTE, Ltd.,  
35 Plaintiff,

32 [Related to Docket No. 243]

36 v.  
37 CAVIC AVIATION LEASING (IRELAND)  
38 22 CO. DESIGNATED ACTIVITY  
39 COMPANY; and BOMBARDIER  
40 AEROSPACE CORPORATION,  
41 Defendants.

36 Hearing:  
37 Date: July 14, 2021  
38 Time: 9:00 a.m. (PDT)  
39 Place: Courtroom 1575  
40 255 East Temple Street  
41 Los Angeles, CA 90012

1 This matter came upon the Trustee’s *Motion to File Unredacted Amended Complaint and*  
2 *Redline Under Seal* [Adv. Docket No. 243] (the “Motion”), the Court having reviewed the Motion;  
3 *Bombardier Aerospace Corporation’s Response to the Trustee’s Application to File Unredacted*  
4 *Amended Complaint and Redline Under Seal* [Adv. Docket No. 250]; *Jetcraft and FK Entities’*  
5 *Response to Trustee’s Motion to File Unredacted Amended Complaint and Redline Under Seal*  
6 [Adv. Docket No. 251]; *CAVIC Aviation Leasing (Ireland) 22 Co. Designated Activity Company’s*  
7 *Memorandum in Support of Trustee’s Motion to Seal* [Adv. Docket No. 253]; the redacted  
8 proposed First Amended Adversary Complaint and color-coded redline showing changes to the  
9 original Complaint, which were filed on the public docket [Adv. Docket No. 263]; the unredacted  
10 proposed First Amended Adversary Complaint and color-coded redline showing changes to the  
11 original Complaint, which were separately submitted to the Court by the Trustee on or about May  
12 21, 2021; and it appearing that the Motion and responses comply with the Stipulated Protective  
13 Order in *King v. Jetcraft Corp.*, Adv. Proc. No. 2:19-ap-01382-SK (Bankr. C.D. Cal.) [*Jetcraft*  
14 Docket No. 143], the Court’s prior order regarding sealing the original Complaint [Adv. Docket  
15 No. 88], and applicable Local Bankruptcy Rules and the Court Manual, and for other good cause  
16 appearing for the reasons stated in the Motion and the responses,

17 **IT IS HEREBY ORDERED**, that:

- 18 1. The Motion is granted.
- 19 2. The Trustee shall file the unredacted proposed First Amended Adversary  
20 Complaint and color-coded redline showing changes to the original Complaint under seal.
- 21 3. The Trustee has leave to file under seal the unredacted First Amended Adversary  
22 Complaint, consistent with the Court’s Memorandum of Decision on “Motion for Leave to Amend  
23 Adversary Complaint,” Docket #242, Filed by Chapter 7 Trustee Jonathan D. King [Adv. Docket  
24 No. 275], without further motion or application for leave to file under seal.

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4. Any party may, in future motions or pleadings, redact and file under seal any quoted language from the as-filed First Amended Adversary Complaint that had already been redacted or sealed without further motion or application for leave to file under seal.

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**CERTIFICATION OF COUNSEL**

I, Joseph A. Roselius, certify under penalty of perjury that the above Order (1) Granting Trustee’s Motion to File Unredacted Proposed Amended Complaint and Redline Under Seal and (2) Authorizing Filing of First Amended Complaint Under Seal has been circulated to and approved by counsel for the defendants to this adversary proceeding.

DATED: July 16, 2021

**DLA PIPER LLP (US)**

  
\_\_\_\_\_  
Joseph A. Roselius

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
DLA Piper LLP (US)  
2000 Avenue of the Stars, Suite 400 North Tower  
Los Angeles, CA 90067-4704

A true and correct copy of the document entitled *Notice of Lodgment of Order (1) Granting Trustee's Motion to File Unredacted Proposed Amended Complaint and Redline Under Seal and (2) Authorizing Filing of First Amended Complaint Under Seal* will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing documents were served by the court via NEF and hyperlink to the document. On July 16, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On July 16, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 16, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA HAND DELIVERY

VIA ELECTRONIC MAIL

(Party, who is being served if different, and email address for each)

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 16, 2021  
Date

William L. Countryman, Jr.  
Printed Name

/s/ William L. Countryman, Jr.  
Signature

**Counsel via Electronic Mail**

**Bombardier Aerospace Corporation and  
Bombardier, Inc.**

Attn.: Matthew S. Walker  
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Attn.: Andrew Troop  
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Attn.: Carolina A. Fornos  
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**CAVIC Aviation Leasing (Ireland) 22 Co.  
Designated Activity Company**

Attn.: Alan Watson  
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Attn.: Robert J. Labate  
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Attn.: Kristina S. Azlin  
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**United States Trustee**

Attn.: Dare Law  
Email: dare.law@usdoj.gov

Attn.: Ron Maroko  
Email: ron.maroko@usdoj.gov

Attn.: Jill Sturtevant  
Email: jill.sturtevant@usdoj.gov

Attn.: Peter C. Anderson  
Email: peter.c.anderson@usdoj.gov

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.