

<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 GRANTING TRUSTEE’S APPLICATION TO FILE UNREDACTED PROPOSED CONSOLIDATED AMENDED COMPLAINT UNDER SEAL FOR CONSIDERATION RE: TRUSTEE’S MOTION FOR CONSOLIDATION [DOCKET NO. 184]</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 Application to File Unredacted Proposed Consolidated Amended Complaint Under Seal for Consideration re: Trustee’s Motion for Consolidation [Docket No. 184]** was lodged on July 16, 2021 and is attached. This order relates to docket numbers 217.

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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 GRANTING TRUSTEE'S**  
30 **APPLICATION TO FILE UNREDACTED**  
31 **PROPOSED CONSOLIDATED**  
32 **AMENDED COMPLAINT UNDER SEAL**  
33 **FOR CONSIDERATION RE:**  
34 **TRUSTEE'S MOTION FOR**  
35 **CONSOLIDATION [DOCKET NO. 184]**

36 JONATHAN D. KING, solely in his capacity  
37 as Chapter 7 Trustee of Zetta Jet USA, Inc. and  
38 Zetta Jet PTE, Ltd.,  
39 Plaintiff,

36 [Related to Docket No. 217]

40 v.  
41 CAVIC AVIATION LEASING (IRELAND)  
42 22 CO. DESIGNATED ACTIVITY  
43 COMPANY; and BOMBARDIER  
44 AEROSPACE CORPORATION,  
45 Defendants.

41 Hearing:  
42 Date: July 14, 2021  
43 Time: 9:00 a.m. (PDT)  
44 Place: Courtroom 1575  
45 255 East Temple Street  
46 Los Angeles, CA 90012

1 This matter came upon the Trustee’s *Application and Motion for Leave to File Unredacted*  
2 *Proposed Consolidated Amended Complaint Under Seal* [Adv. Docket No. 217] (the  
3 “Application”), the Court having reviewed the Application; the proposed redacted and unredacted  
4 versions of the proposed consolidated amended complaint which were separately submitted to the  
5 Court by the Trustee on or about February 18, 2021; *Bombardier Aerospace Corporation’s*  
6 *Response to the Trustee’s Application and Motion for Leave to File Unredacted Proposed*  
7 *Consolidated Amended Complaint Under Seal Pursuant to Section 107(B) of the Bankruptcy Code*  
8 [Adv. Docket No. 229]; *CAVIC Aviation Leasing (Ireland) 22 Co. Designated Activity Company’s*  
9 *(1) Memorandum in Support of Trustee’s Motion to Seal [Docket No. 217]; and (2) Declaration*  
10 *of Gong Yuan in Support Thereof* [Adv. Docket No. 230]; the proposed redacted and unredacted  
11 versions of the proposed consolidated amended complaint which were separately submitted to the  
12 Court by the defendants on or about March 4, 2021; and the *Trustee’s Statement Regarding Motion*  
13 *for Leave to File Revised Redacted Proposed Consolidated Amended Complaint Under Seal* [Adv.  
14 Docket No. 232]; and it appearing that the Application and responses comply with the Stipulated  
15 Protective Order in *King v. Jetcraft Corp.*, Adv. Proc. No. 2:19-ap-01382-SK (Bankr. C.D. Cal.)  
16 [*Jetcraft* Docket No. 143], the Court’s prior order regarding sealing the original Complaint [Adv.  
17 Docket No. 88], and applicable Local Bankruptcy Rules and the Court Manual, and for other good  
18 cause appearing for the reasons stated in the Application and the responses,

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

- 20 1. The Application is granted.
- 21 2. The Trustee shall file the redacted Proposed Consolidated Amended Complaint,  
22 with the redactions as set forth in the version submitted to the Court by the defendants on or about  
23 March 4, 2021, on the public docket.
- 24 3. The Trustee shall file the unredacted Proposed Consolidated Amended Complaint  
25 under seal.

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**CERTIFICATION OF COUNSEL**

I, Joseph A. Roselius, certify under penalty of perjury that the above Order Granting Trustee’s Application to File Unredacted Proposed Consolidated Amended Complaint Under Seal for Consideration Re: Trustee’s Motion for Consolidation [Docket No. 184] 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 (l) the entitled *Notice of Lodgment of Order Granting Trustee's Application to File Unredacted Proposed Consolidated Amended Complaint Under Seal for Consideration re: Trustee's Motion for Consolidation [Docket No. 184]* 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

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

**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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**United States Trustee**

Attn.: Dare Law  
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Attn.: Ron Maroko  
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Attn.: Jill Sturtevant  
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Attn.: Peter C. Anderson  
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.