

1 RON BENDER (SBN 143364)
2 JULIET Y. OH (SBN 211414)
3 JOHN-PATRICK M. FRITZ (SBN 245240)
4 LEVENE, NEALE, BENDER, YOO & BRILL L.L.P.
5 10250 Constellation Boulevard, Suite 1700
6 Los Angeles, California 90067
7 Telephone: (310) 229-1234
8 Facsimile: (310) 229-1244
9 Email: RB@LNBYB.COM; JYO@LNBYB.COM; JPF@LNBYB.COM

Proposed Attorneys for Chapter 11 Debtor
and Debtor in Possession

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

12
13 In re:

14 ZETTA JET USA, INC., a California
15 corporation,

16 Debtor and Debtor in Possession.

Case No.: 2:17-bk-21386-SK

Chapter 11

**SUPPLEMENT TO DEBTOR'S
EMERGENCY MOTION FOR
AUTHORITY TO (1) PAY PRE-PETITION
PRIORITY WAGES; AND (2) HONOR
EMPLOYMENT AND BENEFIT
POLICIES**

Emergency Hearing:

Date: September 20, 2017

Time: 2:00 p.m.

Place: Courtroom 1575

255 East Temple Street

Los Angeles, CA 90012

1 Zetta Jet USA, Inc., a California corporation and the debtor and debtor in possession in
2 the above-captioned Chapter 11 bankruptcy case (the “Debtor”), hereby submits this
3 Supplement to that certain *Debtor’s Emergency Motion For Authority To (1) Pay Pre-Petition*
4 *Priority Wages; And (2) Honor Employment And Benefit Policies* [Doc. No. 7] (the “Motion”)
5 filed by the Debtor on September 19, 2017.

6 Pursuant to the Motion, the Debtor seeks the entry of an order authorizing the Debtor to
7 (1) pay pre-petition priority wages, including all applicable federal and state withholding taxes
8 and payroll taxes (collectively, “Wages”), to its non-insider employees and independent
9 contractors (collectively, “Employees,” and each, an “Employee”), provided that no Employee
10 shall receive more than \$12,850 for such Wages; and (2) continue to honor the Debtor’s
11 employment and benefit policies in the ordinary course of the Debtor’s business

12 A Court hearing was held on the Motion on September 20, 2017 at 2:00 p.m., at which
13 time counsel for the Debtor advised the Court that approximately ten (10) independent
14 contractors had been inadvertently excluded from the Motion and requested that any order
15 granting the Motion extend the relief requested in the Motion to such excluded independent
16 contractors. At the hearing, the Court granted the Motion in its entirety and ordered that the
17 relief requested in the Motion extend to the foregoing excluded independent contractors.

18 The Debtor files this Supplement to identify those independent contractors that were
19 inadvertently excluded from the Motion. Although at the time of the hearing on the Motion,
20 counsel for the Debtor indicated that there were a total of ten (10) excluded independent
21 contractors, there are actually a total of eleven (11) excluded independent contractors
22 (collectively, the “Excluded Contractors”), as identified below:

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Last Name	First Name	Department	Amount Due on 9/22/2017
Ayala	Jorge	MX Support Staff	\$1,200.00
Blackwelder	Tina	Sales	\$5,208.33
Buettner	Anna	Pilot	\$250.00
De Asis	Sean	MX Contractor	\$5,491.97

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Medina	Sofia	Flight Services & AC Stocking	\$1,475.84
Moffett	Richard	Ops Contractor	\$4,000.00
Nichols	Autumn	Flight Attendant	\$3,744.64
Ojeda	Vianney	Maintenance Admin.	\$2,288.00
Ortiz	Marilenny	Flight Services & AC Stocking	\$1,000.00
Parker	Anna	Maintenance Admin.	\$1,424.00
Urbina	Pablo	MX Support Staff	\$2,080.00
		TOTAL:	\$28,162.78

WHEREFORE, the Debtor respectfully requests that the Court enter an order, substantially in the form lodged concurrently herewith, granting the Motion in its entirety and extending the relief requested in the Motion to all eleven (11) Excluded Contractors identified above.

Dated: September 20, 2017

ZETTA JET USA, INC.



By: _____

RON BENDER
JULIET Y. OH
JOHN-PATRICK M. FRITZ
LEVENE, NEALE, BENDER, YOO
& BRILL L.L.P.
Proposed Attorneys for Debtor and
Debtor in Possession

PROOF OF SERVICE OF DOCUMENT

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I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled: **SUPPLEMENT TO DEBTOR’S EMERGENCY MOTION FOR AUTHORITY TO (1) PAY PRE-PETITION PRIORITY WAGES; AND (2) HONOR EMPLOYMENT AND BENEFIT POLICIES** 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 document will be served by the court via NEF and hyperlink to the document. On **September 20, 2017**, 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:

- Ron Bender rb@Inbyb.com
- John-Patrick M Fritz jpf@Inbyb.com, JPF.LNBYB@ecf.inforruptcy.com
- Dare Law dare.law@usdoj.gov
- Juliet Y Oh jyo@Inbrb.com, jyo@Inbrb.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

2. **SERVED BY UNITED STATES MAIL**: On **September 20, 2017**, 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 **September 20, 2017**, 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.

Served via Attorney Service

The Honorable Sandra R. Klein
United States Bankruptcy Court
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1582 / Courtroom 1575
Los Angeles, CA 90012

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

September 20, 2017	Stephanie Reichert	/s/ Stephanie Reichert
<i>Date</i>	<i>Type Name</i>	<i>Signature</i>