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Attorneys for Jonathan D. King as Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

ZETTA JET USA, INC., a California corporation,

Debtor.

In re

ZETTA JET PTE, LTD., a Singaporean corporation,

Debtor.

☒ Affects Both Debtors

☐ Affects Zetta Jet USA, Inc., a California corporation, only

☐ Affects Zetta Jet PTE, Ltd., a Singaporean corporation, only

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

Chapter 7

Jointly Administered With:
Case No.: 2:17-bk-21387-SK

REPLY IN SUPPORT OF CHAPTER 7 TRUSTEE'S APPLICATION TO EMPLOY OGIER AS SPECIAL COUNSEL PURSUANT TO SECTIONS 327(a) AND 330 OF THE BANKRUPTCY CODE

[Relates to Docket Nos. 1594, 1598, 1607, 1608, 1611, 1612]

Hearing:
Date: September 15, 2021
Time: 9:00 a.m. PDT
Place: Courtroom 1575
255 East Temple Street
Los Angeles, CA 90012

Jonathan D. King, as chapter 7 Trustee of the above-captioned Debtors' estates, hereby files this reply (the "Reply") in response to the *Objection of Universal Leader and Glove Assets to Chapter 7 Trustee's Application to Employ Ogier as Special Counsel* [Docket No. 1607] (the "Objection") and in support of the *Chapter 7 Trustee's Application to Employ Ogier as Special Counsel, Pursuant to Sections 327(a) and 330 of the Bankruptcy Code* (the "Application").[1]

In support of this Reply, the Trustee relies on the *Supplemental Declaration of Nicholas Burkill* [Docket No. 1611] (the "Burkill Declaration") and the *Declaration of John K. Lyons* [Docket No. 1612] (the "Lyons Declaration"), which are fully incorporated by reference. The Trustee respectfully states as follows:

PRELIMINARY STATEMENT

The Application seeks to retain Ogier as special counsel to the Trustee in the British Virgin Islands ("BVI"). As further detailed below, Ogier's services were, and continue to be, necessary because defendants in the Yuntian Adversary Proceeding raised issues of BVI law, and those issues will continue to be relevant if the Trustee succeeds in his appeal and the Yuntian Adversary Proceeding is remanded to the Court.[2] In addition, BVI law will be relevant to the Trustee's anticipated complaint against Universal Leader Investment Limited, Glove Assets Investment Limited, and Truly Great Global Limited (collectively, the "UL Defendants") to recover over $78 million in preferential transfers under Singapore law, as well as enforcement of the default judgment in the New Target Adversary Proceeding. Thus, Ogier's retention is necessary to enable the Trustee to perform his statutory duties and maximize the value of the Debtors' estates.

The Objection argues that Ogier's retention is unnecessary because the court dismissed the Yuntian Adversary Proceeding. As noted above, the Trustee has appealed the Court's dismissal of the Yuntian Adversary Proceeding, and BVI law is relevant to other issues affecting the Debtors' estates. Accordingly, this argument is without merit.

The Objection further asserts, incorrectly, that the Application seeks a *nunc pro tunc* retention order. This is not so, as Ninth Circuit precedent and prior rulings from this Court make

[1] Capitalized terms not defined are defined as in the Application.

[2] *See Notice of Appeal and Statement of Election* [Yuntian Adversary Proceeding Docket No. 328].

clear that *nunc pro tunc* retention is unnecessary under the circumstances. It is within a bankruptcy court's discretion to approve professional retention after a professional has commenced services for the estate, and such professional may be compensated for performing those services without first obtaining an order approving their retention. Indeed, as outlined in the Lyons Declaration, it would have been impractical to retain Ogier prior to commencing services for the Trustee absent entry of an emergency order by the Court or substantially delaying the briefing schedule on the Motions to Dismiss (defined below). Accordingly, the Objection is without merit and should be overruled.

ARGUMENT

I. Retention of Ogier Is Necessary to Assist the Trustee in Performing His Statutory Duties.

The Application seeks to retain Ogier as special BVI counsel to assist the Trustee in carrying out his statutory duties. *See* 11 U.S.C. § 327(a). As noted in the Application and further detailed in the Lyons Declaration, Li Qi's motion to dismiss the Yuntian Adversary Proceeding (the "Li Qi Motion to Dismiss")[3] and the similar motion filed by the UL Defendants (the "UL Motion to Dismiss"[4] and, together with the Li Qi Motion to Dismiss, the "Motions to Dismiss"), both filed on May 10, 2021, raised issues of BVI law and, in support, submitted the declaration of Peter Ferrer (the "Ferrer Declaration"), a BVI lawyer, to opine on BVI issues.[5] Lyons Decl., ¶ 4. Pursuant to the Court's briefing schedule, the Trustee had until June 3, 2021 to file a response to the Motions to Dismiss.[6] On May 18, 2021, the Trustee and Ogier finalized an engagement agreement under which, among other things, Ogier agreed to assist the Trustee in responding to the Motions to Dismiss. *Id.* On June 3, 2021, the Trustee filed his response to the Motions to Dismiss, which response included the *Declaration of Nicholas Charles Burkill* [Docket No. 257-13], which rebutted the assertions in the Motions to Dismiss including the Ferrer Declaration. *See*

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[3] *See Defendant Li Qi's Motion to Dismiss Counts I, II, VII, VIII, and IX of Amended Adversary Complaint for Lack of Personal Jurisdiction, Insufficient Service of Process and Failure to State a Claim* [Yuntian Adversary Proceeding Docket No. 239].

[4] *Defendants Universal Leader, Glove Assets Investment Limited, And Truly Great Global Limited's Motion to Dismiss Counts I, II, VI, VII, VIII, IX & X and Motion to Strike Counts VIII& I of Amended Adversary Complaint* [Docket No. 238].

[5] *See Declaration of Peter Ferrer in Support of Li Qi's Motion to Dismiss* [Yuntian Adversary Proceeding Docket No. 239-2].

[6] *See* Yuntian Adversary Proceeding Docket Nos. 241, 242.

generally Burkill Declaration, 5-13. Over 80% of Ogier's legal services were performed prior to June 3, 2021, which related primarily to the preparation and submission of the Burkill Declaration and related BVI legal advice. Lyons Decl., ¶ 5. Accordingly, the retention of Ogier was necessary to assist the Trustee to carry out his statutory duties in defending the *Amended Adversary Complaint*[7] (the "Amended Complaint") and could not be feasibly obtained before commencement of services.

Furthermore, the Trustee will need additional legal services from Ogier to advise him on issues arising under BVI law. In the event the Trustee prevails on his appeal and the case is remanded for further proceedings with the Court, Ogier's continued services could be required to support the merits of the Amended Complaint. *See* Lyons Decl., ¶ 8.[8]

In addition, issues of BVI law will be relevant to the Trustee's anticipated complaint to be filed against the UL Defendants in Singapore seeking to recover over $78 million in preferential transfers under Singapore law as authorized, and adjudicated, by the High Court of the Republic of Singapore under its order granting the Trustee's *Motion of Chapter 11 Trustee for The Entry of an Order Pursuant to Bankruptcy Code Sections 105 and 1505 Authorizing the Chapter 11 Trustee to Commence Recognition Proceedings Before Foreign Courts* [Docket No. 332] (the "Recognition Order"). *See* Recognition Order, ¶ 4; Lyons Decl. ¶ 9.

Finally, issues of BVI law are also likely to be relevant to the enforcement of the default judgment against the defendants in the New Target Adversary Proceeding.[9] *See* Lyons Decl., ¶ 10.

The Objection argues that retention of Ogier is unnecessary and will not benefit the Debtors' estates because the Court dismissed the Yuntian Adversary Proceeding. For the reasons stated, this is factually wrong, is without legal basis, and should be overruled.

II. The Trustee Is Not Seeking *Nunc Pro Tunc* Approval of Ogier's Retention.

The Objection inaccurately interprets the Application as seeking a *nunc pro tunc* retention

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[7] Yuntian Adversary Proceeding, Docket No. 232.

[8] *See Order on (1) Defendants Universal Leader Investment Limited, Glove Assets Investment Limited, and Truly Great Global Limited's Motion to Dismiss Counts 1, 2, 6, 7, 8, 9, and 10 of Amended Adversary Complaint, and (2) Defendant Li Qi's Motion to Dismiss Counts 1, 2, 7, 8, and 9 of Amended Adversary Complaint* [Docket No. 319]; *Notice of Appeal and Statement of Election* [Yuntian Adversary Proceeding Docket No. 328].

[9] *See* New Target Adversary Proceeding, Docket No. 209.

order contrary to the Supreme Court's ruling in *Roman Catholic Archdiocese of San Juan, Puerto Rico v. Acevedo Feliciano*, 140 S. Ct. 696 (2020) ("Acevedo").[10] It does not, because *nunc pro tunc* relief is not necessary under Ninth Circuit precedent, under which bankruptcy courts have inherent authority to approve a professional's pre-retention services. For example, in *In re Hunanyan*, Judge Tighe carefully examined the interplay of Section 327 and 330 of the Bankruptcy Code in determining whether a professional could be retained under Section 327 following the provision of legal services and whether the professional could be compensated for such work. 2021 WL 2389273, at *1 (Bankr. C.D. Cal. 2021). In examining this issue, Judge Tighe noted that "*Acevedo* does not change existing authority of the court to approve employment that has commenced before the motion was brought." *Id*. at *2 (Bankr. C.D. Cal. 2021). The court further noted that it had "explicit authority under 11 U.S.C. § 327 to approve th[e] employment application without resorting to equitable principles or issuing nunc pro tunc orders." *Id.*

In fact, the Court in these cases previously approved the exact same relief when it approved the retention application of FTI Consulting, Inc. ("FTI") last year. With respect to FTI's retention, the issue of *nunc pro tunc* retention was specifically raised by the Court at the hearing held on August 19, 2020. The original retention application for FTI sought *nunc pro tunc* relief. In light of *Acevedo*, the Trustee's counsel consented to the removal of *nunc pro tunc* language from the proposed order.[11] However, the Court approved the FTI application without *nunc pro tunc* relief and subsequently approved fees relating to pre-retention services.[12]

III. There Was No Unjustifiable Delay in Filing the Application.

The Objection argues that the Application should be denied due to the Trustee's "unjustifiable" delay in filing it. *See* Objection, at 6-7.

First, the UL Defendants do not—and cannot—credibly assert that they are somehow prejudiced by the Application. The UL Defendants submitted the Ferrer Declaration in support of

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[10] In *Acevedo*, the Supreme Court held that a *nunc pro tunc* order could not be used to retroactively confer jurisdiction upon a court that did not actually have jurisdiction at the time it entered the relevant orders. *See Acevedo*, 140 S.Ct. at 700.

[11] *See* Hearing Trans., Aug. 19, 2020, 7:17-18.

[12] *See Order on Application for Payment of Interim Fees and/or Expenses* [Docket No. 1560]. The Trustee intends to include Ogier's fee request along with other professional fee requests for the period January 1 through June 30, 2021 in the next round of interim fee requests.

the Motions to Dismiss. They cannot claim they were surprised by the need for the Trustee to retain a BVI law firm—without obtaining advance Court approval—to assist him in timely responding to the Ferrer Declaration by June 3, 2021.

In addition, the time period between commencement of Ogier's services and filing of the Application—90 days—is within the range of timeframes for other professional retentions that were granted in these cases. Longer time periods elapsed with respect to the applications highlighted below:

Professional	Date Work Commenced	Date Retention Application Filed	Time Period	Date Retention Order Entered	Time Period
AJCapital Advisors Pte. Limited	April 8, 2019	July 17, 2019 [D.I. 970]	100 days	August 9, 2019 [D.I. 993]	124 days
FTI Consulting, Inc.	March 31, 2020	June 19, 2020 [D.I. 1271]	81 days	September 2, 2020 [D.I. 1355]	156 days
KCP Advisory Group LLC	January 8, 2018	January 17, 2018 [D.I. 554]	10 days	February 6, 2018 [D.I. 605]	30 days
Michael Goldman & Associates, LLC	January 8, 2018	January 17, 2018 [D.I. 554]	10 days	February 6, 2018 [D.I. 605]	30 days
KordaMentha	December 14, 2017	February 2, 2018 [D.I. 614]	51 days	February 28, 2018 [D.I. 631]	77 days
Omni Agent Solutions f/k/a Rust Consulting/Omni Bankruptcy, a division of Rust Consulting, Inc.	December 4, 2017	December 29, 2017 [D.I. 521]	26 days	January 19, 2018 [D.I. 566]	47 days
Oon & Bazul LLP	December 6, 2017	February 9, 2018 [D.I. 612]	66 days	April 6, 2018 [D.I. 661]	122 days
PricewaterhouseCoopers Advisory Services LLC	January 22, 2018	February 9, 2018 [D.I. 610]	19 days	February 28, 2018 [D.I. 632]	38 days
Seabury Corporate Finance LLC	October 5, 2017	October 25, 2017 [D.I. 272]	21 days	December 1, 2017 [D.I. 448]	58 days
Seabury Securities LLC	October 5, 2017	October 25, 2017 [D.I. 272]	21 days	December 1, 2017 [D.I. 448]	58 days
WongPartnership LLP	December 4, 2017	May 9, 2018 [D.I. 730]	157 days	July 27, 2018 [D.I. 797]	235 days
		Average Days Elapsed	52 days	**Average Days Elapsed**	89 days

See Lyons Decl., ¶ 7.

The Objection further argues that, even if *nunc pro tunc* relief were permitted, the "three-month delay" requires a showing of exceptional circumstances. Objection, at 5. As noted above,

the Application is not seeking *nunc pro tunc* relief. Regardless, Ninth Circuit precedent makes clear that the time lapse between the commencement of Ogier's services and filing of the Application presents no barrier to granting the Application.

For example, in *Hunanyan*, the court noted the confusion that has arisen in the context of approval of employment and compensation, which are separate functions. 2021 WL 2389273, at *5. It noted that timeliness of a submission will sometimes arise when an employment application is filed "long after the employment commenced, and usually where it is at the same time that fees are sought under 330." *Id.* The court concluded that delayed application cases are better understood as the court's exercising control of compensation, and that "unreasonable delays" require explanations justifying the delay. *Id.* at *6.

The Objection cites several cases—all more than 30 years old—to argue that negligence or oversight are not sufficient to warrant *nunc pro tunc* retention. Leaving aside that the Trustee is not seeking *nunc pro tunc* retention, all of the cited cases are easily distinguishable. For example, in *In re Downtown Inv. Club III*, the court found that entry of a *nunc pro tunc* retention order, which was entered more than *four years* after bankruptcy counsel commenced services, was an abuse of discretion. 89 B.R. 59, 63 (9th Cir. B.A.P. 1988). The court found that counsel could not be excused from compliance with section 327 by instead seeking compensation for a substantial contribution under section 503(b)(4). The failure to comply with section 327 led to an undisclosed and impermissible conflict of interest. The other cited cases are similarly distinguishable. *See In re Kroeger Properties and Dev. Co., Inc.*, 57 B.R. 821 (9th Cir. B.A.P. 1986) (debtor's counsel would not be granted a *nunc pro tunc* retention order where he served for two years before requesting court approval provided no reason other than simple neglect); *Matter of Arkansas, Co., Inc.*, 798 F.2d 645 (3d Cir. 1986) (denying *nunc pro tunc* approval of a retention order where counsel to creditors' committee waited 13 months, citing only "inadvertence").

Further, no "negligence" or "inadvertence" was present. Instead, the Trustee's counsel was devoting significant amounts of time to briefing the various adversary proceedings and meeting various court deadlines. After the Trustee filed his opposition to the Motions to Dismiss in the Yuntian Adversary Proceeding on June 3, 2021, other matters arose apart from the Motions to

Dismiss that required the Trustee's counsel's full attention, resulting in an additional delay in filing the Application. For example, between the commencement of Ogier's services and the filing of the Application, the Trustee's counsel filed pleadings for leave to amend the complaint as well as an amended complaint in the Jetcraft Adversary Proceeding,[13] briefed an objection and motion to strike in the Yuntian Adversary Proceeding, prepared for mediation regarding the CAVIC Adversary Proceeding,[14] briefed a motion for leave to amend the complaint and filed an amended complaint in the CAVIC adversary proceeding, among other pleadings, and responses in support of fee applications that were hotly contested by the adversary defendants. *See* Lyons Decl., ¶ 6.

Accordingly, the Objection is without merit and should be overruled.

CONCLUSION

For the reasons above and in the Application, the Court should overrule the Objection and grant the Application and any other relief the Court considers appropriate.

Dated: September 8, 2021

DLA PIPER LLP (US)

/s/ John K. Lyons
David B. Farkas (SBN 257137)
John K. Lyons (admitted *pro hac vice*)
Jeffrey S. Torosian (admitted *pro hac vice*)
Joseph A. Roselius (admitted *pro hac vice*)

Attorneys for the Trustee

[13] *See King v. Jetcraft Corp.* et al., Adv. Proc. No. 2:19-ap-01382-SK, Docket Nos. 229, 233, 234.

[14] *See King v. CAVIC Aviation Leasing (Ireland) 22 Co. Designated Activity Co., et al.*, Adv. Proc. No. 2:19-ap-01147-SK.

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:
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A true and correct copy of the foregoing document entitled *Reply in Support of Chapter 7 Trustee's Application to Employ Ogier as Special Counsel Pursuant to Sections 327(a) and 330 of the Bankruptcy Code* 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 8, 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:

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☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:
On September 8, 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.

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☐ 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 8, 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.

September 8, 2021	William L. Countryman, Jr.	*/s/ William L. Countryman, Jr.*
Date	*Printed Name*	*Signature*

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20 Largest Creditors Served via Electronic Mail	
World Fuel Services, Inc. Attn.: Calvin Chia Email: cchia@wfscorp.com Attn.: Randye Soref Email: rsoref@polsinelli.com Attn.: Justin Edelson Email: jedelson@polsinelli.com	**CAE Simuflite, Inc.** Attn.: Rebecca J. Winthrop Email: rebecca.winthrop@nortonrosefulbright.com
Rainbow Aviation Limited Attn.: Benedict Tan Email: benedicttan@stamfordland.com Attn.: Dawn M. Coulson Email: dcoulson@eppscoulson.com	**Corporate Jet Support** Attn.: Whitne Keenan Email: wkeenan@corpjetsupport.com
Hongkong & Shanghai Banking Corp Ltd. Attn.: Jennifer W. Crastz Email: jcrastz@hrhlaw.com	**Associated Energy Group, LLC (AEG Fuel)** Attn.: Christopher Clementi Email: cclementi@aegfuels.com Attn.: Jack Praetzellis Email: jpraetzellis@foxrothschild.com
Universal Weather & Aviation Inc. (UWA) and Universal Fuels, Inc. (UVAir) Attn.: Jeanne M. Jorgensen Email: jjorgensen@pj-law.com	**Wex Bank** Attn.: Kiran Patel Email: kiran.patel@wexinc.com
Hanergy [Yoda Aviation] Attn.: John Zhang Email: zhangbin@hanergy.com	**UVAir European Fuelling Services Ltd** Attn.: Jeanne M. Jorgensen Email: jjorgensen@pjlaw.com
Eurocontrol Attn.: Paul Sanze Email: paul.sanze@eurocontrol.int	**Festin Management, SN 1360 LLC, and SN 1372 LLC** Attn.: Daniel J. McCarthy, Esq. Email: dmccarthy@hillfarrer.com Attn.: James Torrey at Jimmy Jets Email: jimt@jimmyjets.net

20 Largest Creditors Served via Electronic Mail	
Tongda Air Service Attn.: Fuhua Mansion Email: tongda@tdas-intl.com	**Jeppesen Sanderson, Inc.** Attn.: Doris Fuller Email: Doris.fuller@jeppesen.com
ARINC Direct, LLC Attn.: Victor A. Vilaplana Email: vavilaplana@foley.com Attn.: Erika L. Morabito Email: emorabito@foley.com Attn.: Brittany J. Nelson Email: bnelson@foley.com	

Aircraft Finance and Aircraft Lease Parties by Electronic Mail (if not listed above)	
Argus Marine Ventures, Ltd. Attn.: Stephen G. Larson Email: slarson@larsonobrienlaw.com	**Jet Support Services (JSSI)** Attn.: Richard Schumacher Email: rschumacher@jetsupport.com
AVIC International Leasing Co., Ltd. Attn.: Wayne Wong Email: wangqicong@chinaleasing.net Attn.: Robert J. Labate Email: robert.labate@hklaw.com Attn.: Alan J. Watson Email: alan.watson@hklaw.com	**Tony Robbins Productions, Inc.** Attn.: Alan I. Nahmias Email: anahmias@mbnlawyers.com Attn.: Stephen F. Biegenzahn Email: sbiegenzahn@mbnlawyers.com
Big Fly LLC Attn.: Michael D. Breslauer Email: mbreslauer@swsslaw.com	**Ample United Limited** Attn.: William W. Huckins Email: whuckins@allenmatkins.com Attn.: Michael S. Greger Email: mgreger@allenmatkins.com
TVPX ARS, Inc. Attn.: David Wall Email: dwall@tvpx.com	**PTJ Associates LLC** Attn.: Stephen Hofer Email: shofer@aerlex.com

Jet Aviation Attn.: Sarah R. Borders Email: sborders@kslaw.com	**ECN Capital Corp. and ECN Aviation, Inc. (f/k/a Element Aviation, Inc.)** Attn.: Michael O'Keefe Email: mokeefe@ecncapitalcorp.com Attn.: Cecily A. Dumas Email: Cecily.dumas@pillsburylaw.com
Yuntian 3 Leasing Company Limited and Yuntian 4 Leasing Company Limited Attn.: Joshua M. Mester Email: jmester@jonesday.com Attn.: Dan T. Moss Email: dtmoss@jonesday.com	

Other Requests for Service by Electronic Mail	
The Debtors (Zetta Jet USA, Inc. and Zetta Jet PTE, Ltd.) Attn.: John-Patrick M. Fritz Email: jpf@lnbyb.com Attn.: Juliet Y. Oh Email: jyo@lnbyb.com Attn.: Ron Bender Email: rb@lnbyb.com	**The Li Entities (Truly Great Global, Ltd., Universal Leader Investment Ltd., and Glove Assets Investment Ltd.)** Attn.: Michael L. Bernstein Email: michael.bernstein@apks.com Attn.: Charles A. Malloy Email: charles.malloy@apks.com Attn.: Lisa Hill Fenning Email: lisa.fenning@apks.com Attn.: Tiffany M. Ikeda Email: tiffany.ikeda@apks.com
United States Trustee Attn.: Dare Law Email: dare.law@usdoj.gov Attn.: Ron Maroko Email: ron.maroko@usdoj.gov	**New Jubilee Global Limited** Attn.: Michael B. McCollum Email: Michael@mccullumcounsel.com
Export Development Canada Attn.: Jeff Blattman Email: jblattman@edc.ca	**Bank of Utah** Attn.: Colleen Schulthies Email: cschulthies@bankofutah.com

Silver Lake Technology Management, L.L.C. Attn.: Michael D. Kibler Email: mkibler@stblaw.com	**New Target Investments Limited** Attn: Michael Lubic Email: michael.lubic@klgates.com