

1 JOHN N. TEDFORD, IV (State Bar No. 205537)
jtedford@DanningGill.com
2 ZEV SHECHTMAN (State Bar No. 266280)
zs@DanningGill.com
3 MICHAEL G. D'ALBA (State Bar No. 264403)
mdalba@DanningGill.com
4 DANNING, GILL, ISRAEL & KRASNOFF, LLP
1901 Avenue of the Stars, Suite 450
5 Los Angeles, California 90067-6006
Telephone: (310) 277-6006
6 Facsimile: (310) 277-5735
7 Attorneys for Airport Van Rental, Inc. and AVR
Vanpool, Inc., Debtors and Debtors in Possession
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9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **LOS ANGELES DIVISION**

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14 AIRPORT VAN RENTAL, INC., et al.,¹
15 Debtors and Debtors in
16 Possession.

Case No. 2:20-bk-20876-BB

Chapter 11 (Jointly Administered)

**NOTICE OF PROPOSED REJECTION
OF EXECUTORY CONTRACTS AND
UNEXPIRED LEASES, AND DEADLINE
FOR OBJECTING TO CONFIRMATION
OF PLAN**

- 17 Affects all Debtors
18 Affects the following Debtor(s):
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27 ¹ Pursuant to an order of the Court, this case is being jointly administered with a case filed by AVR Vanpool, Inc.,
28 a California corporation, case no. 2:20-bk-20883-BB. The case also was jointly administered with the following three
cases that have been dismissed: Airport Van Rental, Inc., a Georgia corporation, case no. 2:20-bk-20877-BB; Airport
Van Rental, Inc., a Nevada corporation, case no. 2:20-bk-20878-BB; and Airport Van Rental, LLP, a Texas limited
liability partnership, case no. 2:20-bk-20882-BB.

1 **PLEASE TAKE NOTICE** that on May 24, 2022, Airport Van Rental, Inc., a California
2 corporation, and AVR Vanpool, Inc., a California corporation (collectively the “**Debtors**”) filed a
3 *First Amended Chapter 11 Plan of Reorganization Dated May 24, 2022* (the “**Plan**”) (*docket no.*
4 *912*), and their accompanying *Disclosure Statement for First Amended Chapter 11 Plan of*
5 *Reorganization Dated May 24, 2022* (the “**Disclosure Statement**”) (*docket no. 913*).

6 **PLEASE TAKE FURTHER NOTICE** that on May 27, 2022, the Court entered an order
7 approving the Disclosure Statement (the “**Disclosure Statement Order**”) (*docket no. 924*). The
8 Disclosure Statement Order authorizes the Debtors to solicit votes to accept or reject the Plan and
9 establishes procedures relating thereto (the “**Solicitation Procedures**”).

10 **PLEASE TAKE FURTHER NOTICE** that the hearing to consider confirmation of the
11 Plan (the “**Confirmation Hearing**”) will commence at **August 24, 2022, at 10:00 a.m.**
12 **(prevailing Pacific time)** before the Honorable Sheri Bluebond, United States Bankruptcy Judge,
13 in the United States Bankruptcy Court for the Central District of California, located in Courtroom
14 1539, 255 East Temple Street, Los Angeles, California. The Confirmation Hearing may be
15 continued from time to time by the Debtors or the Court without further notice other than by
16 announcement in open court or by a notice of continuance filed with the Court and served on such
17 parties as the Court may order. Moreover, the Plan may be modified or amended, if necessary,
18 pursuant to section 1127 of the Bankruptcy Code, prior to, during, or as a result of the
19 Confirmation Hearing without further notice to parties in interest.

20 **PLEASE TAKE FURTHER NOTICE** that you are receiving this notice because the
21 Debtors’ records reflect that you are a counterparty to an executory contract or unexpired lease that,
22 as of and subject to the occurrence of the Effective Date, will be rejected by the Debtors. You are
23 advised to review carefully the information contained in this notice and the related provisions of
24 the Plan.

25 **PLEASE TAKE FURTHER NOTICE** that a proof of claim asserting a claim arising from
26 the rejection of an executory contract or unexpired lease must be filed with the Court by the later of
27 30 days from (1) the date of entry of an order (including the Confirmation Order) approving such
28 rejection, and (2) the effective date of the rejection of the affected executory contract or unexpired

1 lease. **Any claims arising from the rejection of an executory contract or unexpired lease (a**
2 **“Rejection Damages Claim”)** not filed within such time will be disallowed pursuant to the
3 **Confirmation Order, forever barred from assertion, and will not be enforceable against, as**
4 **applicable, the Debtors, the Reorganized Debtors, the Debtors’ estates, or property of the**
5 **foregoing, without the need for any objection by the Debtors or the Reorganized Debtors, as**
6 **applicable, or further notice to, or action, order, or approval of the Court or any other entity,**
7 **and any claim arising out of the rejection of the executory contract or unexpired lease will be**
8 **deemed fully satisfied, released, and discharged, notwithstanding anything in the Debtors’**
9 **schedules or a proof of claim to the contrary.** Rejection Damages Claims will be classified as
10 Class 15 Claims and such claims may be objected to in accordance with the Plan. If no objection to
11 the Rejection Damages Claim is filed on or before the Claims Objection Deadline (as set forth in
12 the Plan and the Confirmation Order), the Rejection Damages Claim will become an allowed claim.

13 **PLEASE TAKE FURTHER NOTICE** that the deadline for filing objections to
14 confirmation of the Plan is **August 3, 2022** (the **“Plan Objection Deadline”**). **Objections to**
15 **Confirmation of the Plan not timely filed and served in the manner set forth herein may not**
16 **be considered by the Bankruptcy Court and may be overruled without further notice.**

17 Any objection to confirmation of the Plan must: (1) be in writing; (2) conform to the
18 Federal Rules of Bankruptcy Procedure and the Bankruptcy Court’s Local Bankruptcy Rules;
19 (3) state the name and address of the objecting party and the amount and nature of the Claim of
20 such entity; (4) state with particularity the basis and nature of the party’s objection to the Plan; and
21 (5) be filed with the Bankruptcy Court on or before the Plan Objection Deadline. If the objection is
22 not filed electronically, a copy of the objection must be served on the following by electronic mail,
23 or any other manner, so it is received by them no later than the Plan Objection Deadline:

24 *Attorney for the Debtors*
25 John N. Tedford, IV (*jtford@DanningGill.com*)
26 Zev Shechtman (*zs@DanningGill.com*)
27 Danning, Gill, Israel & Krasnoff, LLP
28 1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067

1 Attorneys for the Committee
2 Michael I. Gottfried (*mgottfried@elkinskalt.com*)
3 Roye Zur (*rzur@elkinskalt.com*)
4 Elkins Kalt Weintraub Reuben Gartside LLP
5 10345 W. Olympic Blvd.
6 Los Angeles, California 90064

Office of the United States Trustee
ATTN: Eryk R. Escobar (*eryk.r.escobar@usdoj.gov*)
915 Wilshire Blvd., Suite 1850
Los Angeles, California 90017

7 Any party seeking to offer evidence at the Confirmation Hearing shall present testimony of
8 all witnesses through declarations under penalty of perjury and admissible under the Federal Rules
9 of Evidence. Declarations offered by any party objecting to confirmation of the Plan shall be filed
10 and served on or before the Plan Objection Deadline (**August 3, 2022**). **Evidence that is not**
11 **timely filed will be stricken from the record and will not be considered in determining**
12 **contested matters that may arise at the Confirmation Hearing.**

13 **PLEASE TAKE FURTHER NOTICE** that copies of the Solicitation Package (except
14 Ballots) are available free of charge at <https://cases.omniagentsolutions.com/home?clientId=3595>.
15 You may also obtain copies of any pleadings filed in these Chapter 11 cases for a fee via the
16 Court's CM/ECF system at <https://ecf.cacb.uscourts.gov>.

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18 DATED: June 7, 2022

DANNING, GILL, ISRAEL & KRASNOFF, LLP

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20 By: /s/ John N. Tedford, IV
21 JOHN N. TEDFORD, IV
22 Attorneys for Airport Van Rental, Inc. and AVR
23 Vanpool, Inc., Debtors and Debtors in Possession
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