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8

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

12
13
14 AIRPORT VAN RENTAL, INC., et al.,¹
15 Debtors and Debtors in
16 Possession.

- 17 Affects all Debtors
18 Affects the following Debtor(s):
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21
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23
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Case No. 2:20-bk-20876-BB

Chapter 11 (Jointly Administered)

**NOTICE OF (1) APPROVAL OF
DISCLOSURE STATEMENT,
(2) HEARING ON CONFIRMATION OF
THE PLAN, (3) PROCEDURES FOR
OBJECTING TO CONFIRMATION OF
THE PLAN, AND (4) PROCEDURES AND
DEADLINE FOR VOTING ON THE
PLAN**

Confirmation Hearing:

Date: August 24, 2022
Time: 10:00 a.m.
Place: Courtroom 1539
255 East Temple Street
Los Angeles, California

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26
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 Disclosure Statement Order established,
11 among others, the following dates and deadlines in connection with the Solicitation Procedures and
12 Confirmation Hearing:

Event	Date
Voting Record Date	June 1, 2022
Solicitation Date	June 8, 2022
Rule 3018(a) Motion Deadline	June 22, 2022
Voting Resolution Event Deadline	July 13, 2022
Voting Deadline	July 20, 2022 at 4:00 p.m. (prevailing Pacific time)
Voting Report Deadline	July 22, 2022
Plan Objection Deadline	August 3, 2022
Deadline to file (1) reply to plan objection(s), and (2) briefs and declarations in support of plan confirmation	August 17, 2022
Confirmation Hearing	August 24, 2022 at 10:00 a.m. (prevailing Pacific time)

26 **PLEASE TAKE FURTHER NOTICE** that the hearing to consider confirmation of the
27 Plan (the “**Confirmation Hearing**”) will commence on **August 24, 2022, at 10:00 a.m.**
28 **(prevailing Pacific time)** before the Honorable Sheri Bluebond, United States Bankruptcy Judge,

1 in the United States Bankruptcy Court for the Central District of California, located in Courtroom
2 1539, 255 East Temple Street, Los Angeles, California. The Confirmation Hearing may be
3 continued from time to time by the Debtors or the Court without further notice other than by
4 announcement in open court or by a notice of continuance filed with the Court and served on such
5 parties as the Court may order. Moreover, the Plan may be modified or amended, if necessary,
6 pursuant to section 1127 of the Bankruptcy Code, prior to, during, or as a result of the
7 Confirmation Hearing without further notice to parties in interest.

8
9 **Classification and Voting Rights**

10 In accordance with sections 1122 and 1123 of the Bankruptcy Code, the Plan classifies
11 holders of claims and equity interests in various classes for all purposes, including with respect to
12 voting, as follows:²

Class	Holder(s)	Status	Voting Rights
1	1st Source Bank	Impaired	Entitled to Vote
2	1st Source Bank (from AFC)	Impaired	Entitled to Vote
3	Sumitomo Mitsui Finance and Leasing Co.	Impaired	Entitled to Vote
4	Hitachi Capital America Corp.	Impaired	Entitled to Vote
5	United Leasing	Impaired	Entitled to Vote
6	U.S. Small Business Administration	Impaired	Entitled to Vote
7	LCA Bank Corporation	Unimpaired	Not Entitled to Vote
8	San Diego County Regional Airport Authority	Unimpaired	Not Entitled to Vote
9	Colorado Department of Revenue	Impaired	Entitled to Vote
10	City of Commerce City, Colorado	Impaired	Entitled to Vote
11	Texas Comptroller of Public Accounts (related to motor vehicle rental taxes)	Impaired	Entitled to Vote

27 _____
28 ² The Court has not made any determination as to whether classes identified in the Plan as
"Impaired" are impaired, as that term is defined in the Bankruptcy Code.

Class	Holder(s)	Status	Voting Rights
12	Texas Comptroller of Public Accounts (related to franchise taxes)	Impaired	Entitled to Vote
13	Priority Wage Claims	Unimpaired	Not Entitled to Vote
14	Convenience Class Claims	Unimpaired	Not Entitled to Vote
15	General Unsecured Claims	Impaired	Entitled to Vote
16	Interests in AVR California	TBD	Not Entitled to Vote
17	Interests in AVR Vanpool	TBD	Not Entitled to Vote

Record Date for Holders of Claims

The “**Voting Record Date**” is the date established by the Court for determining which holders of claims and interests are entitled to receive a Solicitation Package and vote on the Plan. The Voting Record Date is **June 1, 2022**.

Voting Deadline

All votes to accept or reject the Plan must be **actually received** by the Debtors’ counsel by **July 20, 2022, at 4:00 p.m. (prevailing Pacific time)** (the “**Voting Deadline**”). If you held a claim as of the Voting Record Date and are a member of a class that is entitled to vote to accept or reject the Plan, you received a Ballot applicable to your class and instructions for submitting your Ballot. For your vote to be counted, you must: (1) follow all of the instructions carefully; (2) complete all of the required information on the Ballot; and (3) sign, date and return your completed Ballot to the Debtors’ counsel in accordance with the voting instructions on or before the Voting Deadline. A failure to follow such instructions may disqualify your vote.

Parties in Interest Not Entitled to Vote

Holders of unimpaired claims and/or interests in classes deemed to accept the Plan, and holders of impaired interests in classes deemed to reject the Plan, are not entitled to vote and will not receive a Ballot. Such holders will instead receive (1) this Confirmation Hearing Notice and

1 (2) a *Notice of Non-Voting Status to Holders of Claims and Equity Interests That Are Deemed to*
2 *Accept or Reject the Debtors' Proposed 1st Amended Chapter 11 Plan of Reorganization Dated*
3 *May 24, 2022.*

4 If an objection to allowance of your claim was filed on or before **June 8, 2022**, or if you
5 disagree with the Debtors' classification or request for estimation of your claim, and you believe
6 that you should be entitled to vote on the Plan, you must file with the Court a motion for an order,
7 pursuant to Federal Rule of Bankruptcy Procedure 3018(a), temporarily allowing such claim for
8 purposes of voting to accept or reject the Plan (a "**Rule 3018(a) Motion**"). All Rule 3018(a)
9 Motions must be filed with the Court and served on the Debtors on or before **June 22, 2022** (the
10 "**Rule 3018(a) Motion Deadline**"). If a creditor files a timely Rule 3018(a) Motion, such
11 creditor's Ballot will not be counted unless temporarily allowed by the Court for voting purposes
12 pursuant to a Resolution Event prior to **July 13, 2022** (the "**Voting Resolution Event Deadline**")
13 or as otherwise set forth in the Disclosure Statement Order.

14
15 **Objections to Confirmation of the Plan**

16 *Plan Objection Deadline.* The deadline for filing objections to confirmation of the Plan is
17 **August 3, 2022** (the "**Plan Objection Deadline**").

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

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Attorney for the Debtors

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

If any objection to confirmation of the Plan is not filed and served as prescribed herein, the objecting party may be barred from objecting to conformation of the Plan and may not be heard at the Confirmation Hearing.

Additional Information

If you would like to obtain a Solicitation Package, you may obtain copies of the Solicitation Package free of charge at <https://cases.omniagentsolutions.com/home?clientId=3595>. You may also obtain copies of any pleadings filed in these Chapter 11 cases for a fee via the Court's CM/ECF system at <https://ecf.cacb.uscourts.gov>.

Please carefully review and consider the Plan and all of its terms. If the Plan is confirmed, it will be binding on all holders of claims and equity interests whether or not a particular holder voted or affirmatively voted to reject the Plan.

DATED: June 7, 2022

DANNING, GILL, ISRAEL & KRASNOFF, LLP

By: /s/ John N. Tedford, IV

JOHN N. TEDFORD, IV

Attorneys for Airport Van Rental, Inc. and AVR
Vanpool, Inc., Debtors and Debtors in Possession