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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 15
Virgin Australia Holdings Ltd, <i>et al.</i> , (ACN 100 686 226) ¹)	Case No. 20-11024 (SHL)
Debtors in a Foreign Proceeding. ²)	(Joint Administration Requested)

**MOTION FOR ORDER SCHEDULING RECOGNITION HEARING
AND SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

Vaughan Strawbridge, Richard Hughes, John Greig, and Salvatore Algeri, in their capacities as joint and several administrators and foreign representatives (the “Administrators” or

¹ An Australian Company Number (“ACN”) is a unique nine-digit number issued by the Australian Securities and Investments Commission (“ASIC”) to every company registered under the Commonwealth Corporations Act 2001 as an identifier.

² The Debtors in these cases, along with the last three digits of each Debtor’s ACN number, are: Virgin Australia Holdings Ltd (226); Virgin Australia International Operations Pty Ltd (608); Virgin Australia International Holdings Pty Ltd (021); Virgin Australia International Airlines Pty Ltd (823); Virgin Australia Airlines (SE Asia) Pty Ltd (389); Virgin Australia Airlines Holdings Pty Ltd (675); VAH Newco No. 1 Pty Ltd (345); Tiger Airways Australia Pty Limited (008); Virgin Australia Airlines Pty Ltd (965); VA Borrower 2019 No. 1 Pty Ltd (059); VA Borrower 2019 No. 2 Pty Ltd (343); Virgin Tech Pty Ltd (879); Short Haul 2018 No. 1 Pty Ltd (831); Short Haul 2017 No. 1 (390); Short Haul 2017 No. 2 Pty Ltd (443); Short Haul 2017 No. 3 Pty Ltd (813); VBNC5 Pty Ltd (502); A.C.N. 098 904 262 Pty Ltd (262); Virgin Australia Regional Airlines Pty Ltd (662); Virgin Australia Holidays Pty Ltd (159); VB Ventures Pty Ltd (004); Virgin Australia Cargo Pty Ltd (838); VB Leaseco Pty Ltd (741); VA Hold Co Pty Ltd (157); VA Lease Co Pty Ltd (291); Virgin Australia 2013-1 Issuer Co Pty Ltd (326); 737 2012 No. 1 Pty. Ltd (859); 737 2012 No. 2 Pty Ltd (064); Short Haul 2016 No. 1 Pty Ltd (328); Short Haul 2016 No. 2 Pty Ltd (077); Short Haul 2014 No. 1 Pty Ltd (612); Short Haul 2014 No. 2 Pty Ltd (199); VA Regional Leaseco Pty Ltd (605); VB 800 2009 Pty Ltd (934); VB Leaseco No. 2 Pty Ltd (319); VB LH 2008 No. 1 (354); VB LH 2008 No. 2 Pty Ltd (805); VB PDP 2010-11 Pty Ltd (266); Tiger International Number 1 Pty Ltd (944). The service address for each of the above Debtors is Deloitte Brisbane, Riverside Centre, 123 Eagle St, Brisbane QLD 4000, Australia.

the “Foreign Representatives”) of the above-captioned debtors (collectively, the “Foreign Debtors”), subject to extraordinary administration proceedings currently pending in the Federal Court of Australia (the “Australian Proceedings”), respectfully states as follows in support of this motion:

Relief Requested

1. The Foreign Representatives respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Order”): (a) setting May [●], 2020, or as soon thereafter as the Court’s calendar permits, as the date (the “Recognition Hearing Date”) for the hearing (the “Recognition Hearing”) on the relief sought in the *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representatives, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (the “Verified Petition”),³ filed contemporaneously herewith; (b) setting the seventh day before the date of the Recognition Hearing as the deadline by which any responses or objections to the Verified Petition must be received (the “Objection Deadline”); (c) approving the form of notice of the Recognition Hearing (the “Notice”), substantially in the form attached hereto as **Exhibit 1** to **Exhibit A**; and (d) approving the manner of service of the Notice as described herein.

Background

2. On the date hereof, the Foreign Representatives filed voluntary petitions for relief under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) for each of the Foreign Debtors in the United States Bankruptcy Court for the Southern District of New York. A description of the Foreign Debtors’ business and the events leading up to the commencement of the Australian Proceedings and these chapter 15 cases is included in the *Declaration of Foreign Representative Pursuant to 11 U.S.C. § 1515 and Rule 1007(a)(4) of the Federal Rules of Bankruptcy Procedure and in Support of Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (the “Algeri Declaration”), filed concurrently herewith and fully incorporated herein by reference.

Jurisdiction and Venue

3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. The Foreign Debtors confirm their consent, pursuant to Bankruptcy Rule 7008, to the entry of a final order by the Court in connection with the Verified Petition to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

4. These chapter 15 cases have been properly commenced pursuant to section 1504 of the Bankruptcy Code by the filing of petitions for recognition of the Australian Proceedings under section 1515 of the Bankruptcy Code.

³ Capitalized terms used but not defined herein shall have the meaning given to them in the Verified Petition.

5. Venue is proper pursuant to 28 U.S.C. § 1410(1) and (3). Certain of the Foreign Debtors have either issued or guaranteed unsecured notes that are governed by New York law and that specify New York as the appropriate venue for any legal proceedings related thereto. Additionally, certain of the Foreign Debtors have property in the United States, including bank accounts, leased aircraft and related equipment.

6. The statutory bases for the relief requested herein are sections 1504, 1510, 1515, 1517, and 1521 of the Bankruptcy Code, rules 2002(l), 2002(m), 2002(p), 2002(q), and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 2002-4 and 9013-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”).

Basis For Relief

I. Form and Manner of Service of the Notice.

7. Bankruptcy Rule 2002(q)(1) provides that:

...the debtor, all persons or bodies authorized to administer foreign proceedings of the debtor, all entities against whom provisional relief is being sought under § 1519 of the Code, all parties to litigation pending in the United States in which the debtor is a party at the time of the filing of the petition, and such other entities as the court may direct, [shall be given] at least 21 days’ notice by mail of the hearing [on the petition for recognition of a foreign proceeding].

Fed. R. Bankr. P. 2002(q). Bankruptcy Rule 2002(q), however, does not provide any additional details regarding the form and manner in which such notice must be given. Pursuant to Bankruptcy Rules 2002(m) and 9007, when notice is to be given under the Bankruptcy Rules, the presiding court may designate the form and manner in which such notice shall be given. Fed. R. Bankr. P. 2002(m), 9007.

8. The Foreign Debtors are not currently seeking provisional relief against any entity in connection with these chapter 15 cases and are not party to any litigation in the U.S. Accordingly, the Foreign Representatives thus respectfully submit that service of the Verified Petition, Notice, and other relevant chapter 15 pleadings and notices by electronic mail and/or first-class mail on the following parties: (a) the Office of the United States Trustee; (b) the United States Attorney for the Southern District of New York; (c) the trustee under the indenture to the 7.875% Unsecured Senior Notes due 2021; (d) the trustee under the indenture to the 8.125% Senior Notes due 2024; (e) any other parties of which the Foreign Representatives become aware that are required to receive notice pursuant to Bankruptcy Rule 2002(q); (f) Cogency Global, Inc., 10 E. 40th Street, 10th Floor, New York, NY 10016 as the authorized process agent under the indentures (g) all known trade vendors located in the United States; (h) all employees located in the United States; and (i) such other entities as this Court may direct (collectively, the “Notice Parties”) satisfies Bankruptcy Rule 2002(q). The Foreign Representatives also intend to post copies of the Verified Petition, Notice, and other relevant chapter 15 pleadings and notices to a website that it maintains for creditors of the Virgin Australia Group at <https://www2.deloitte.com/au/virgin-chapter-15>.

9. The Foreign Debtors submit that the form and manner of service of the Notice requested herein for the Notice Parties constitutes adequate and sufficient notice of these chapter 15 cases and the relief sought in the Verified Petition. Accordingly, the Foreign Representatives respectfully request that this Court approve the form and manner of service of the Notice for the Notice Parties.

II. Subsequent Notice and Foreign Creditors.

10. Parties filing a notice of appearance in these chapter 15 cases should consult the Foreign Debtors' website, maintained by the Foreign Representatives, at <https://www2.deloitte.com/au/virgin-chapter-15> for any subsequent pleadings filed by the Foreign Representatives in these chapter 15 cases.

11. Out of an abundance of caution, the Foreign Representatives also seek to clarify that certain notice requirements are not applicable in these chapter 15 cases. Specifically, section 1514(c) of the Bankruptcy Code provides that when notification of the commencement of a case is to be given to foreign creditors, such notification shall, among other things, indicate the time period for filing proofs of claim, specify the place for filing such proofs of claim and indicate whether secured creditors need to file proofs of claim. 11 U.S.C. § 1514(c). Section 1514, though, applies only in plenary cases and does not apply in the context of an ancillary chapter 15 case like these. *See* COLLIER ON BANKRUPTCY ¶ 1514.01 (Richard Levin & Henry J. Sommer eds. 16th ed. 2018) (section 1514 of the Bankruptcy Code is “[t]he last in the series of sections dealing with the international aspects of cases under chapters other than chapter 15 that began with section 1511.”). For this reason, courts in this district often grant waivers of section 1514(c) in this context. *See, e.g., In re Quintis Ltd.*, Case No 18-12739 (MG) (Bankr. S.D.N.Y. Sep. 13, 2018); *In re Agrokor D.D.*, Case No. 18-12104 (MG) (Bankr. S.D.N.Y. July 23, 2018); *In re Blue Ocean Res. Pte. Ltd.*, Case No. 18-22806 (RDD) (Bankr. S.D.N.Y. June 11, 2018); *In re Avanti Commc'ns Grp. Plc.*, Case No. 18-10458 (MG) (Bankr. S.D.N.Y. Feb. 26, 2018); *In re Pacific Expl. & Prod. Corp.*, Case No. 16-11189 (JLG) (Bankr. S.D.N.Y. May 2, 2016).

III. Form and Manner of Responses and Objections to the Verified Petition.

12. The Foreign Representatives respectfully request that any response or objection to the Verified Petition be made pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, including, without limitation, Bankruptcy Rule 1011, in writing and setting forth the basis therefor. Such response or objection should be filed with the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408, and served upon counsel for the Foreign Representatives so as to be *actually received* by the Objection Deadline. Notices to counsel for the Foreign Representatives should be addressed to Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York NY 10036, Attn: Abid Qureshi and Akin Gump Strauss Hauer & Feld LLP, 65 Memorial Road Suite C340, West Hartford, CT 06107, Attn: Renée M. Dailey.

13. Bankruptcy Rule 1011(b) provides that, among other things, a party objecting to a petition to recognize a foreign proceeding under chapter 15 has 21 days from the date of service of the petition to respond. In light of this requirement, it is appropriate to set (a) May [●], 2020, or as soon thereafter as the Court's calendar permits, as the Recognition Hearing Date, and (b) the

seventh day before the date of the Recognition Hearing as the deadline by which any responses or objections to the relief sought in the Verified Petition as the Objection Deadline.

Satisfaction of Local Rule 9013-1(a)

14. This motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated, and a discussion of their application to this motion. Accordingly, the Foreign Debtors submit that the motion satisfies Local Rule 9013-1(a).

Notice

15. The Foreign Representatives have provided notice of this motion to: (a) the Office of the United States Trustee; (b) the United States Attorney for the Southern District of New York; (c) the trustee under the indenture to the 7.875% Unsecured Senior Notes due 2021, The Bank of New York Mellon, 1010 Barclay Street, 21st Floor, New York, NY 10286, Attn: Global Corporate Trust—Virgin Australia Holdings Limited; (d) the trustee under the indenture to the 8.125% Senior Notes due 2024, The Bank of New York Mellon, 1010 Barclay Street, 21st Floor, New York, NY 10286, Attn: Global Corporate Trust—Virgin Australia Holdings Limited; (e) Cogency Global, Inc., 10 E. 40th Street, 10th Floor, New York, NY 10016 as the authorized process agent under the indentures; (f) any other parties of which the Foreign Representatives become aware that are required to receive notice pursuant to Bankruptcy Rule 2002(q); (g) all known trade vendors located in the United States; (h) all employees located in the United States; and (i) such other parties in interest that have requested notice pursuant to Bankruptcy Rule 2002. The Foreign Representatives also intend to post this motion to a website that it maintains for creditors of the Virgin Australia Group at <https://www2.deloitte.com/au/virgin-chapter-15>. In light of the relief requested, the Foreign Representatives submit that no further notice is necessary.

No Prior Request

16. No prior request for the relief requested herein has been made to this or any other court.

[Remainder of page intentionally left blank.]

WHEREFORE the Foreign Representatives respectfully request the Court enter the proposed order, substantially in the form attached hereto as **Exhibit A**, (i) scheduling a hearing on the relief sought in the Verified Petition and (ii) specifying the form and manner of service of notice thereof.

New York, New York
Dated: April 29, 2020

/s/ Abid Qureshi

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Counsel to the Foreign Representatives

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 15
)	
Virgin Australia Holdings Ltd, <i>et al.</i> ,)	Case No. 20-11024 (SHL)
(ACN 100 686 226) ¹)	
)	
Debtors in a Foreign Proceeding. ²)	(Joint Administration Requested)
)	
)	

**ORDER SCHEDULING RECOGNITION HEARING AND
SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

Upon the motion (the “Motion”) of Vaughan Strawbridge, Richard Hughes, John Greig, and Salvatore Algeri as the authorized foreign representatives (the “Foreign Representatives”) of the above-captioned foreign debtors (collectively, the “Foreign Debtors”), seeking entry of an order (a) scheduling a hearing on the relief sought in the Verified Petition, (b) setting the deadline by which any responses or objections to the Verified Petition must be received, and (c) specifying the form and manner of service of notice of the hearing on the relief sought in the Verified Petition; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and 11 U.S.C. §§ 109 and 1501; and that this Court may enter a final order consistent with Article III of the United States Constitution; venue being proper before the Court pursuant to 28 U.S.C. § 1410(1) and (3); adequate and sufficient notice of the filing of the Motion having been given by the Foreign Representatives; it appearing that the relief requested in the Motion is necessary and beneficial to the Foreign Debtors; and no objections or other responses

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² The Debtors in these cases, along with the last three digits of each Debtor’s ACN number, are: Virgin Australia Holdings Ltd (226); Virgin Australia International Operations Pty Ltd (608); Virgin Australia International Holdings Pty Ltd (021); Virgin Australia International Airlines Pty Ltd (823); Virgin Australia Airlines (SE Asia) Pty Ltd (389); Virgin Australia Airlines Holdings Pty Ltd (675); VAH Newco No. 1 Pty Ltd (345); Tiger Airways Australia Pty Limited (008); Virgin Australia Airlines Pty Ltd (965); VA Borrower 2019 No. 1 Pty Ltd (059); VA Borrower 2019 No. 2 Pty Ltd (343); Virgin Tech Pty Ltd (879); Short Haul 2018 No. 1 Pty Ltd (831); Short Haul 2017 No. 1 (390); Short Haul 2017 No. 2 Pty Ltd (443); Short Haul 2017 No. 3 Pty Ltd (813); VBNC5 Pty Ltd (502); A.C.N. 098 904 262 Pty Ltd (262); Virgin Australia Regional Airlines Pty Ltd (662); Virgin Australia Holidays Pty Ltd (159); VB Ventures Pty Ltd (004); Virgin Australia Cargo Pty Ltd (838); VB Leaseco Pty Ltd (741); VA Hold Co Pty Ltd (157); VA Lease Co Pty Ltd (291); Virgin Australia 2013-1 Issuer Co Pty Ltd (326); 737 2012 No. 1 Pty. Ltd (859); 737 2012 No. 2 Pty Ltd (064); Short Haul 2016 No. 1 Pty Ltd (328); Short Haul 2016 No. 2 Pty Ltd (077); Short Haul 2014 No. 1 Pty Ltd (612); Short Haul 2014 No. 2 Pty Ltd (199); VA Regional Leaseco Pty Ltd (605); VB 800 2009 Pty Ltd (934); VB Leaseco No. 2 Pty Ltd (319); VB LH 2008 No. 1 (354); VB LH 2008 No. 2 Pty Ltd (805); VB PDP 2010-11 Pty Ltd (266); Tiger International Number 1 Pty Ltd (944). The service address for each of the above Debtors is Deloitte Brisbane, Riverside Centre, 123 Eagle St, Brisbane QLD 4000, Australia.

having been filed that have not been overruled, withdrawn, or otherwise resolved; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is granted as set forth herein.
2. A hearing on the relief requested in the Verified Petition is scheduled for May [●], 2020, at _____.m. (prevailing Eastern Time), or as soon thereafter as counsel shall be heard, in Courtroom [●] of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408.
3. The form of notice of the Recognition Hearing in substantially the form attached hereto as **Exhibit 1** (the “Notice”), including as modified for publication, is hereby approved.
4. The Foreign Representatives shall serve copies of the Notice by first-class mail on (a) the Office of the United States Trustee; (b) the United States Attorney for the Southern District of New York; (c) the trustee under the indenture to the 7.875% Unsecured Senior Notes due 2021, The Bank of New York Mellon, 1010 Barclay Street, 21st Floor, New York, NY 10286, Attn: Global Corporate Trust—Virgin Australia Holdings Limited; (d) the trustee under the indenture to the 8.125% Senior Notes due 2024, The Bank of New York Mellon, 1010 Barclay Street, 21st Floor, New York, NY 10286, Attn: Global Corporate Trust—Virgin Australia Holdings Limited; (e) Cogency Global, Inc., 10 E. 40th Street, 10th Floor, New York, NY 10016 as the authorized process agent under the indentures; and (f) all known trade vendors located in the United States; (g) all employees located in the United States; (h) such other parties in interest that have requested notice pursuant to Bankruptcy Rule 2002; and (i) such other entities as this Court may direct within five business days following entry of this Order. Additionally, the Foreign Representatives shall post the Notice on the Foreign Debtors’ public website.
5. The Foreign Representatives shall serve the Notice and any subsequent notices upon any party that files a notice of appearance in these chapter 15 cases, within five business days of the filing of such notice of appearance, or as soon thereafter as practicable, if such documents have not already been served on such party (or its counsel).
6. Service of the Notice in accordance with this Order is hereby approved as adequate and sufficient notice and service on all interested parties.
7. All notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of these chapter 15 cases or are hereby waived.
8. Responses or objections to the Verified Petition and the relief requested therein must be made pursuant to the Bankruptcy Code, the local rules of the Court, and the Bankruptcy Rules, including, without limitation, Bankruptcy Rule 1011, in writing and setting forth the basis therefor. Such responses must be filed with the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408, and served upon counsel for the Foreign Representatives so as to be *actually received* by them no later than May [●], 2020, at 4:00 p.m. (prevailing Eastern Time). Notices to counsel for the Foreign Representatives should be addressed to Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York NY 10036, Attn: Abid Qureshi and Akin Gump Strauss Hauer & Feld LLP, 65 Memorial Road, Suite C340, West Hartford, CT 06107, Attn: Renèe M. Dailey.

New York, New York
Dated: _____, 2020

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

Notice of Recognition Hearing

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 15
)	
Virgin Australia Holdings Ltd, <i>et al.</i> ,)	Case No. 20-11024 (SHL)
(ACN 100 686 226) ¹)	
)	
Debtors in a Foreign Proceeding. ²)	(Joint Administration Requested)
)	
)	

**NOTICE OF RECOGNITION HEARING
ON FOREIGN RECOGNITION PROCEEDINGS**

PLEASE TAKE NOTICE that on April 29, 2020, Vaughan Strawbridge, Richard Hughes, John Greig, and Salvatore Algeri, in their capacities as joint and several administrators and foreign representatives (the “Administrators” or the “Foreign Representatives”) of the above-captioned foreign debtors (collectively, the “Foreign Debtors”), whose extraordinary administration proceedings under Australian law are currently pending in the Federal Court of Australia (the “Australian Proceedings”), filed a *Verified Petition for (I) Recognition of Foreign Main Proceedings, (II) Recognition of Foreign Representative, and (III) Related Relief under Chapter 15 of the Bankruptcy Code* (the “Verified Petition”) pursuant to 11 U.S.C. §§ 1504, 1515, and 1517 with the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that, among other things, the Debtors seek entry of an order recognizing the Australian Proceedings as foreign main proceedings pursuant to section

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² The Debtors in these cases, along with the last three digits of each Debtor’s ACN number, are: Virgin Australia Holdings Ltd (226); Virgin Australia International Operations Pty Ltd (608); Virgin Australia International Holdings Pty Ltd (021); Virgin Australia International Airlines Pty Ltd (823); Virgin Australia Airlines (SE Asia) Pty Ltd (389); Virgin Australia Airlines Holdings Pty Ltd (675); VAH Newco No. 1 Pty Ltd (345); Tiger Airways Australia Pty Limited (008); Virgin Australia Airlines Pty Ltd (965); VA Borrower 2019 No. 1 Pty Ltd (059); VA Borrower 2019 No. 2 Pty Ltd (343); Virgin Tech Pty Ltd (879); Short Haul 2018 No. 1 Pty Ltd (831); Short Haul 2017 No. 1 (390); Short Haul 2017 No. 2 Pty Ltd (443); Short Haul 2017 No. 3 Pty Ltd (813); VBNC5 Pty Ltd (502); A.C.N. 098 904 262 Pty Ltd (262); Virgin Australia Regional Airlines Pty Ltd (662); Virgin Australia Holidays Pty Ltd (159); VB Ventures Pty Ltd (004); Virgin Australia Cargo Pty Ltd (838); VB Leaseco Pty Ltd (741); VA Hold Co Pty Ltd (157); VA Lease Co Pty Ltd (291); Virgin Australia 2013-1 Issuer Co Pty Ltd (326); 737 2012 No. 1 Pty. Ltd (859); 737 2012 No. 2 Pty Ltd (064); Short Haul 2016 No. 1 Pty Ltd (328); Short Haul 2016 No. 2 Pty Ltd (077); Short Haul 2014 No. 1 Pty Ltd (612); Short Haul 2014 No. 2 Pty Ltd (199); VA Regional Leaseco Pty Ltd (605); VB 800 2009 Pty Ltd (934); VB Leaseco No. 2 Pty Ltd (319); VB LH 2008 No. 1 (354); VB LH 2008 No. 2 Pty Ltd (805); VB PDP 2010-11 Pty Ltd (266); Tiger International Number 1 Pty Ltd (944). The service address for each of the above Debtors is Deloitte Brisbane, Riverside Centre, 123 Eagle St, Brisbane QLD 4000, Australia.

1517 of title 11 of the United States Code (the “Bankruptcy Code”) and granting certain additional relief pursuant to sections 105(a), 1507, 1510, 1515, and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing with respect to the Verified Petition (the “Recognition Hearing”) for [] a./p.m. (prevailing Eastern Time) on May [●], 2020.

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to submit a response or objection to the Verified Petition must do so in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the local rules of the Court, and such response or objection must be in writing and set forth the basis therefor, which response or objection must be filed with the Court in accordance with General Order M-399 and shall be served upon United States counsel for the Foreign Representatives: Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York NY 10036, Attn: Abid Qureshi and Akin Gump Strauss Hauer & Feld LLP, 65 Memorial Road, Suite C340, West Hartford, CT 06107, Attn: Renée M. Dailey, **so as to be actually received no later than May [], 2020, at 4:00 p.m. (prevailing Eastern Time)**, with a courtesy copy served upon the Chambers of the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that copies of the Verified Petition filed by the Foreign Representatives may be obtained by visiting the Court’s website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document) or upon written request to the Foreign Representatives’ United States counsel addressed to: Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York NY 10036, Attn: Abid Qureshi and Akin Gump Strauss Hauer & Feld LLP, 65 Memorial Road, Suite C340, West Hartford, CT 06107, Attn: Renée M. Dailey.

PLEASE TAKE FURTHER NOTICE that hearings in this matter, including the Recognition Hearing, shall take place at the United States Bankruptcy Court of the Southern District of New York, One Bowling Green, New York, New York 10004-1408.

PLEASE TAKE FURTHER NOTICE that at such hearing the Court may order the scheduling of a case management conference to consider the efficient administration of these chapter 15 cases.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Verified Petition carefully and discuss it with your attorney, if you have one in connection with these chapter 15 cases. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested by the Foreign Representatives, or if you want the Court to consider your views on any matter requested at the Recognition Hearing, then you or your attorney must attend such hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the Foreign Representatives and may enter an order granting the relief requested.

New York, New York
Dated: April [●], 2020

/s/ DRAFT

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Counsel to the Foreign Representatives