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James A. Patten (ID #1191) Blake A. Robertson (ID #40509167) **PATTEN, PETERMAN, BEKKEDAHL & GREEN P.L.L.C.** 2817 2nd Avenue North, Ste. 300 P.O. Box 1239 Billings, MT 59103-1239 Telephone (406) 252-8500 Fax: (406) 294-9500 E-mail: <u>apatten@ppbglaw.com</u>

Attorney for the Foreign Representative, Deloitte Restructuring Inc.

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF MONTANA

IN RE:

ASPEN AIR CORPORATION and ASPEN AIR U.S. CORP.,

Debtors.

Case No. 18-60662-15

MOTION TO SCHEDULE ASPEN AIR'S MOTION FOR SUPPLEMENTAL ORDER IN CONJUCTION WITH RECOGNITION HEARING

DELOITTE RESTRUCTURING INC., Foreign Representative, by and through counsel,

James A. Patten, respectfully moves this Court to schedule the hearing on its Motion for

Supplemental Order Recognizing Court of Queen's Bench Order [Doc. # 12] to be heard in

conjunction with the Recognition Hearing scheduled for August 1, 2018.

In support hereof, the Foreign Representative states:

1. The instant proceeding was commenced on July 9, 2018. The Recognition Hearing is

scheduled for August 1, 2018 pursuant to an order of this Court [Doc. #9].

2. An order granting recognition provides certain immediate relief as described in 11 U.S.C.

§ 1520. Additional relief may be granted upon recognition pursuant to 11 U.S.C. § 1521. Toward

that end, the Foreign Representative has filed a Motion for Supplemental Order Recognizing

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Court of Queen's Bench Order [Doc. #12] (the "Motion") for the purpose of this Court's recognition of additional relief.

3. By this motion, the Foreign Representatives seeks to have this Court hear and consider Recognition of the Foreign Main Proceeding and the Motion at the same time. The Foreign Representative therefore requests that this Court set a hearing on the Motion to be held in conjunction with the Hearing on Recognition, scheduled for August 1, 2018.

WHEREFORE, the foregoing, Deloitte Restructuring Inc., respectfully requests this Court to set the hearing on the Motion for Supplemental Order Recognizing Court of Queen's Bench Order on August 1, 2018 at 8:30A.M. at the Mike Mansfield Federal Courthouse, Butte, Montana.

Dated this 12th day of July, 2018.

PATTEN, PETERMAN, BEKKEDAHL & GREEN, PLLC

2817 2nd Avenue North, Suite 300 P.O. Box 1239 Billings, MT 59103-1239

By: /s/ JA Patten James A. Patten Attorney for the Foreign Representative

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify, under penalty of perjury, that on the 12^{th} day of July, 2018, a copy of the foregoing was served by electronic means pursuant to LBR 9013-1(d)(2) on the parties noted in the Court's ECF transmission facilities and/or by mail on the following parties:

Aspen Air Corporation Aspen Air U.S. Corp. President & CEO Attn: Onkar Dhaliwal Southland Tower 10655 Southport Road SW, Suite 1460 Calgary, AB T2W-4Y1

Deloitte Restructuring Inc. Attn: Vanessa Allen Senior Vice President 700 Bankers Court 850-2nd Street SW Calgary, AB T2P-OR8

Doug Schweitzer Dentons Canada LLP 15th Floor Bankers Court 850 – 2nd Street SAW Calgary, AB T2P 0R8

Dawn Walby, CPA, CA, CIRP ATB Corporate Financial Services Eighth Avenue Place West Tower Suite 600 585-8th Ave SW Calgary, Alberta T2P 1G1

Aaron York U.S. Department of Justice Office of United States Trustee Liberty Center, Suite 204 301 Central Avenue Great Falls, MT 59401 18-60662-BPH Doc#: 13 Filed: 07/12/18 Entered: 07/12/18 16:55:31 Page 4 of 4

Yellowstone County Treasurer 217 N. 27th Street #108 Billings, MT 59101

By: /s/JA Patten

For Patten, Peterman, Bekkedahl & Green, PLLC