

Presentment Date and Time: August 6, 2025 at 12:00 PM (ET)
Objection Deadline: August 5, 2025 at 4:00 PM (ET)

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Counsel for the Reorganized Debtors

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

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	:	
In re:	:	Chapter 11
	:	
GOL LINHAS AÉREAS INTELIGENTES S.A.,	:	Case No. 24-10118 (MG)
<i>et al.</i> , ¹	:	
	:	
Reorganized Debtors.	:	(Jointly Administered)
	:	
	-----X	

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: GOL Linhas Aéreas Inteligentes S.A. (N/A); GOL Linhas Aéreas S.A. (0124); GTX S.A. (N/A); GAC, Inc. (N/A); Gol Finance (Luxembourg) (N/A); Gol Finance (Cayman) (N/A); Smiles Fidelidade S.A. (N/A); Smiles Viagens e Turismo S.A. (N/A); Smiles Fidelidade Argentina S.A. (N/A); Smiles Viajes y Turismo S.A. (N/A); Capitânia Air Fundo de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); Sorriso Fundo de Investimento em Cotas de Fundos de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); and Gol Equity Finance (N/A). The Reorganized Debtors' service address is Praça Comandante Linneu Gomes, S/N, Portaria 3, Jardim Aeroporto, 04626-020 São Paulo, São Paulo, Federative Republic of Brazil.

**NOTICE OF PRESENTMENT OF
MOTION FOR FINAL DECREE CLOSING CERTAIN CHAPTER 11 CASES**

PLEASE TAKE NOTICE that the above captioned reorganized debtors and debtors-in-possession (the “Reorganized Debtors”) hereby file the *Motion for Final Decree Closing Certain Chapter 11 Cases* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the undersigned will present the Motion to the Honorable Martin Glenn, Chief United States Bankruptcy Judge for the Southern District of New York, One Bowling Green, New York, NY 10004 (the “Court”) **on August 6, 2025 at 12:00 p.m. (prevailing Eastern time)** (the “Presentment Date”) for approval and signature.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Motion shall: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York, and the *Final Order Implementing Certain Notice and Case Management Procedures* [Docket No. 175]; (iii) be filed electronically with this Court on the docket of *In re GOL Linhas Aéreas Inteligentes S.A.*, Case No. 24-10118 (MG) by registered users of this Court’s electronic filing system (which is available on this Court’s website at <http://www.nysb.uscourts.gov>); and (iv) be served so as to be actually received by **August 5, 2025 at 4:00 p.m. (prevailing Eastern time)** (the “Objection Deadline”), by: (a) the Chambers of the Honorable Martin Glenn, Chief United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004; (b) the Reorganized Debtors, c/o GOL Linhas Aéreas Inteligentes S.A., Praça Comandante Linneu Gomes, S/N, Portaria 3, Jardim Aeroporto, 04626-020 São Paulo, São Paulo, Brazil (Attn: Joseph W. Bliley, Chief Restructuring Officer); (c) Milbank LLP, 55 Hudson Yards, New York, NY 10001 (Attn: Evan R. Fleck, Esq., Lauren C. Doyle, Esq., and Bryan V. Uelk, Esq.), counsel for the Reorganized Debtors; (d) William K. Harrington, U.S. Department of Justice, Office of the U.S. Trustee, One Bowling Green, Suite 534, New York, NY 10004-1408 (Attn: Annie Wells, Esq. and Rachael Siegel, Esq.); (e) the Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549; (f) the Federal Aviation Administration, 800 Independence Ave., S.W. Washington, DC 20591 (Attn: Office of the Chief Counsel); (g) the U.S. Attorney’s Office for the Southern District of New York, One St. Andrew’s Plaza, New York, NY 10007; and (h) Alton Aviation Consultancy LLC, 1700 Broadway, Suite 2202, New York, NY 10019, as General Unsecured Claim Observer.

PLEASE TAKE FURTHER NOTICE that if no objections or other responses are received by the Objection Deadline with respect to the Motion, the Debtors shall, on the Presentment Date, submit the Motion to the Court, which order the Court may enter without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the Debtors and the objecting parties of the date and time of the hearing with respect to the Motion and of the Debtors’ obligation to notify all other parties entitled to receive notice. The Debtors and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that copies of the Motion can be viewed and/or obtained by: (i) accessing the Court's website at <http://www.nysb.uscourts.gov>, (ii) from the Debtors' claims and noticing agent, Kroll, at <https://cases.ra.kroll.com/GOL>, or by calling 844.553.2247 (U.S./Canada) (toll free) or +1.646.777.2315 (International) or by e-mail via GOLInfo@ra.kroll.com. Note that a PACER password is needed to access documents on the Court's website.

Dated: New York, New York
July 22, 2025

MILBANK LLP

/s/ Evan R. Fleck

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UNITED STATES BANKRUPTCY COURT
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In re:	: Chapter 11
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GOL LINHAS AÉREAS INTELIGENTES S.A.,	: Case No. 24-10118 (MG)
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	: (Jointly Administered)
Reorganized Debtors.	:
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¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: GOL Linhas Aéreas Inteligentes S.A. (N/A); GOL Linhas Aéreas S.A. (0124); GTX S.A. (N/A); GAC, Inc. (N/A); Gol Finance (Luxembourg) (N/A); Gol Finance (Cayman) (N/A); Smiles Fidelidade S.A. (N/A); Smiles Viagens e Turismo S.A. (N/A); Smiles Fidelidade Argentina S.A. (N/A); Smiles Viajes y Turismo S.A. (N/A); Capitânia Air Fundo de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); Sorriso Fundo de Investimento em Cotas de Fundos de Investimento Multimercado Crédito Privado Investimento no Exterior (N/A); and Gol Equity Finance (N/A). The Reorganized Debtors' service address is Praça Comandante Linneu Gomes, S/N, Portaria 3, Jardim Aeroporto, 04626-020 São Paulo, São Paulo, Federative Republic of Brazil.

MOTION FOR FINAL DECREE CLOSING CERTAIN CHAPTER 11 CASES

GOL Linhas Aéreas Inteligentes S.A. and the other above-captioned reorganized debtors (the “Reorganized Debtors” and, prior to the effective date of their Plan,² the “Debtors”) respectfully state as follows in support of this motion (the “Motion”):

RELIEF REQUESTED

1. The Reorganized Debtors seek entry of a final decree, substantially in the form attached hereto as **Exhibit A** (the “Final Decree”), (i) closing the chapter 11 cases of each affiliated debtor entity identified on Schedule 1 to the Final Decree (collectively, the “Affiliate Cases”)³ while keeping Case No. 224-10118 of *GOL Linhas Aéreas Inteligentes S.A.* (the “Lead Case”) open for any outstanding matter that must be addressed by the Court and (ii) granting certain related relief.

JURISDICTION

2. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012.

3. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).

4. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

² See *Fifth Modified Third Amended Joint Chapter 11 Plan of Reorganization of GOL Linhas Aéreas Inteligentes S.A. and Its Affiliated Debtors* [Docket No. 1646-1] (the “Plan”). Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Plan.

³ The Affiliate Cases identified on Schedule 1 to the Final Decree are (i) GOL Linhas Aéreas S.A. (Case No. 24-10119), (ii) GTX S.A. (Case No. 24-10121), (iii) GAC, Inc. (Case No. 24-10120), (iv) Gol Finance (Luxembourg) (Case No. 24-10117), (v) Gol Finance (Cayman) (Case No. 24-10122), (vi) Smiles Fidelidade S.A. (Case No. 24-10124), (vii) Smiles Viagens e Turismo S.A. (Case No. 24-10125), (viii) Smiles Fidelidade Argentina S.A. (Case No. 24-10126), (ix) Smiles Viajes y Turismo S.A. (Case No. 24-10127), (x) Capitânia Air Fundo de Investimento Multimercado Crédito Privado Investimento no Exterior (Case No. 24-10128), (xi) Sorriso Fundo de Investimento em Cotas de Fundos de Investimento Multimercado Crédito Privado Investimento no Exterior (Case No. 24-10130), and (xii) Gol Equity Finance (Case No. 24-10131)

5. The bases for the relief requested herein are section 350(a) of title 11 of the United States Code (the “Bankruptcy Code”) and rule 3022 of Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

STATUS OF THE CASES

6. On January 25, 2024 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

7. The Debtors’ cases (the “Chapter 11 Cases”) are being jointly administered pursuant to Bankruptcy Rule 1015(b) and the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 58]. On February 9, 2024, the U.S. Trustee for the Southern District of New York (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”). *See Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 114]. On February 13, 2024, the U.S. Trustee filed a notice amending the composition of the Committee. *See Amended Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 134]. No trustee or examiner has been appointed in these cases.

8. On May 21, 2025, the Court entered the *Order (I) Confirming Fifth Modified Third Amended Joint Chapter 11 Plan of Reorganization of GOL Linhas Aéreas Inteligentes S.A. and Its Affiliated Debtors and (II) Granting Related Relief* [Docket No. 1646] (the “Confirmation Order”).

9. On May 23, 2025, U.S. Trustee filed a notice of appeal of the Confirmation Order (the “Appeal”) [Docket No. 1663]. The issues on Appeal relate to the Plan’s third-party releases and the related injunction. *See Appellant’s Statement of the Issues and Designation of Items for Record on Appeal* [Docket No. 1673]. On June 2, 2025, the Appeal was docketed with the U.S. District Court for the Southern District of New York (the “District Court”). *See In re GOL Linhas Aéreas Inteligentes S.A.*, No. 1:25-cv-04610-DLC (S.D.N.Y. June 2, 2025) [Docket No. 1] (notice

of appeal). There is no stay of the Confirmation Order pending the outcome of the Appeal. *See Order Denying United States Trustee's Motion for a Stay Pending Appeal* [Docket No. 1700]; *In re GOL Linhas Aéreas Inteligentes S.A.*, No. 1:25-cv-04610-DLC (S.D.N.Y. June 5, 2025) [Docket No. 29] (opinion and order vacating interim stay and denying motion for stay pending appeal).

10. On June 6, 2025, the Effective Date occurred. *See Notice of (I) Entry of Confirmation Order, (II) Occurrence of Effective Date, and (III) Final Deadlines for Filing Certain Claims* [Docket No. 1741].

BASIS FOR RELIEF

11. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022, which implements section 350(a) of the Bankruptcy Code, similarly provides that “[a]fter an estate is fully administered in a Chapter 11 case, the court must, on its own or on a party in interest’s motion, enter a final decree closing the case.” Fed. R. Bankr. P. 3022. “Courts have wide discretion in determining whether to close a chapter 11 case and ‘Bankruptcy Rule 3022 is intended to allow bankruptcy courts flexibility in determining whether an estate is fully administered.’” *In re Motors Liquidation Co.*, 625 B.R. 605, 614 (Bankr. S.D.N.Y. 2021) (citing *In re Federated Dep’t Stores, Inc.*, 43 F. App’x 820, 823 (6th Cir. 2002)).

12. Although the phrase “fully administered” is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Local Bankruptcy Rules for the Southern District of New York, the Notes of the Advisory Committee on Bankruptcy Rule 3022 (the “Committee Notes”) set forth the following non-exclusive list of factors to be considered in determining whether an estate has been fully administered:

- (1) whether the order confirming the plan has become final,
- (2) whether deposits required by the plan have been distributed,

- (3) whether the property proposed by the plan to be transferred has been transferred,
- (4) whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan,
- (5) whether payments under the plan have commenced, and
- (6) whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022 advisory committee's note to 1991 amendment. The Committee Notes further provide that the "[e]ntry of a final decree closing a chapter 11 case should not be delayed solely because the payments required by the plan have not been completed," and "[t]he court should not keep the case open only because of the possibility that the court's jurisdiction may be invoked in the future." *Id.*

13. Courts generally use the above six factors to determine whether a case has been fully administered. *See, e.g., Schwartz v. Aquatic Dev. Grp., Inc. (In re Aquatic Dev. Grp., Inc.)*, 352 F.3d 671, 676 n.5 (2d Cir. 2003); *In re Kliegl Bros. Universal Elec. Stage Lighting Co.*, 238 B.R. 531, 542 (Bankr. E.D.N.Y. 1999). These six factors, however, are merely guidelines that aid a court's determination, and each of the factors need not be present before a court enters a final decree. *See Motors Liquidation*, 625 B.R. at 615 ("Although courts should apply and weigh the factors, no one factor is dispositive. Rather, the six factors act as mere guidelines to aid a court in its determination.") (internal citations omitted); *Kliegl Bros.*, 238 B.R. at 542 ("The factors set forth in the [Committee] Note are plainly an aid or checklist that serves to insure that there is no unfinished business before the Court or in the case."); *In re Mold Makers, Inc.*, 124 B.R. 766, 768–69 (Bankr. N.D. Ill. 1990) ("[A]ll of the factors in the Committee Note need not be present before the Court will enter a final decree.").

14. In addition to the factors set forth in the Committee Notes, courts have also considered an estate “fully administered” if the plan of reorganization has been substantially consummated. *See, e.g., In re Gates Cmty. Chapel of Rochester, Inc.*, 212 B.R. 220, 224 (Bankr. W.D.N.Y. 1997) (“[S]everal courts have concluded that a Chapter 11 case should be considered ‘fully administered’ when it reaches the point of substantial consummation as defined in Section 1101(2).”); *Walnut Assocs. v. Saidel*, 164 B.R. 487, 493 (E.D. Pa. 1994) (“A court enters a final decree, pursuant to Rule 3022, once a case has been fully administered.”).

15. The Bankruptcy Code defines the term “substantial consummation” as the:

- (A) transfer of all or substantially all of the property proposed by the plan to be transferred;
- (B) assumption by the debtor or by the successor to the debtor under the plan of business or of the management of all or substantially all of the property dealt with by the plan; and
- (C) commencement of distribution under the plan.

11 U.S.C. § 1101(2).

16. The foregoing factors weigh strongly in favor of closing each of the Affiliate Cases. The Confirmation Order is a final order (subject only to the Appeal with respect to the third-party releases and the related injunction), the Effective Date has occurred, and the Plan has been “substantially consummated” in accordance with section 1101 of the Bankruptcy Code. The Reorganized Debtors have emerged from chapter 11 under a newly organized top-level holding company and have already distributed the vast majority of all Plan consideration, including (i) satisfying all Cure Claims, priority Claims, and Claims entitled to ride through or otherwise be satisfied in Cash, (ii) issuing the Exit Notes, Take-Back Notes, Amended Glide Notes, Amended Debentures, and Amended Safra Notes to the holders of certain Claims, and (iii) issuing the New Equity to Abra and the holders of Allowed General Unsecured Claims. In fact, the Debtors have

consensually resolved almost all Claims prior to Confirmation, except for those subject to the pending *Reorganized Debtors' Seventh Omnibus Objection to Claims* [Docket No. 1794], which objection when sustained will resolve all outstanding proofs of claim filed on account of asserted claims. The Administrative Bar Date has passed. A negligible amount of administrative claims were filed, and such claims will be resolved in the near term. Thus, very few matters remain open in the Chapter 11 Cases.

17. Consistent with the terms of the Plan, all further distributions under the Plan and any pending or further objections to Claims can and will be administered by the Reorganized Debtors in the Lead Case, regardless of whether the Affiliate Cases are closed. Closing the Affiliate Cases will have no impact on the resolution of disputed Claims, Plan distributions, other legal entitlements under the Plan, the substantive rights of any party in interest, or the continuation of the Appeal.

18. While substantially all motions, contested matters, and adversary proceedings have been resolved, the Reorganized Debtors understand that, in addition to continuation of the Appeal, miscellaneous motions, applications, or other matters or proceedings may arise from time to time. Any such remaining matters can be filed, administered, and adjudicated in the Lead Case without any substantive impact on any party in interest.⁴ In *In re Endo International plc*, for example, Judge Garrity closed certain affiliate cases over the objection of a claimant, noting that the remaining cases “will remain open and provide a forum for any disputes that may arise in connection with the distributions and disbursements” on account of outstanding claims. *In re Endo Int'l plc*, 666 B.R. 221, 227 (Bankr. S.D.N.Y. 2024). Moreover, in the unlikely event there is a

⁴ The Reorganized Debtors reserve all rights to dispute any outstanding Claims, and the failure of the Reorganized Debtors to object to any proof of claim filed in the Chapter 11 Cases prior to entry of the Final Decree will not cause such Claim to be deemed allowed. The Reorganized Debtors request that the Court permit any objections to Claims or Interests to be filed, administered, and adjudicated in the Lead Case.

need to reopen any Affiliate Case, the Reorganized Debtors or any party in interest will have the ability to seek to do so in order to address specific matters that may arise. *See* 11 U.S.C. § 350(b).

19. Additionally, the pending Appeal does not preclude entry of a Final Decree with respect to the Affiliate Cases. Pursuant to Article XII of the Plan, the Court has the authority to adjudicate any unresolved matters in the Lead Case, even if the District Court remands the Appeal. Indeed, bankruptcy courts have entered final decrees or otherwise permitted the closing of chapter 11 cases while an appeal of the confirmation order was still pending. *See, e.g., In re Avianca Holdings S.A.*, No. 20-11133 (MG) (Bankr. S.D.N.Y. Sept. 12, 2022, Sept. 16, 2022, Feb. 28, 2023, May 28, 2024) [Docket Nos. 2622, 2626, 2728, 2769] (final decrees closing certain cases notwithstanding pending appeal of the confirmation order); *In re The Container Store Grp., Inc.*, No. 24-90627 (ARP) (Bankr. S.D. Tex. Mar. 11, 2025) [Docket No. 253] (same over the objection of the U.S. Trustee); *In re Careismatic Brands, LLC*, No. 24-10561 (VFP) (Bankr. D.N.J. July 17, 2024) [Docket No. 894] (final decree closing certain cases notwithstanding pending appeal of the confirmation order); *In re Serta Simmons Bedding, LLC*, No. 23-90020 (DRJ) (Bankr. S.D. Tex. Sept. 7, 2023) [Docket No. 1262] (same); *In re Millennium Lab Holdings II, LLC*, No. 15-12284 (LSS) (Bankr. D. Del. Mar. 23, 2018) [Docket No. 547] (same over objections).

20. On the other hand, closing the Affiliate Cases will result in significant savings to the estates. Section 1930(a)(6) of title 28 of the U.S. Code requires that quarterly fees be paid to the U.S. Trustee until a debtor's case is closed. *See* 28 U.S.C. § 1930(a)(6). Thus, unless and until the Court enters a final decree closing the Affiliate Cases, quarterly fees with respect to each applicable Reorganized Debtor will continue to be due to the U.S. Trustee, causing an unnecessary financial burden to the Reorganized Debtors. *See In re Pulp Finish I Co.*, No. 12-13774 (SMB), 2014 WL 201482, at *12 (Bankr. S.D.N.Y. Jan. 16, 2014) (finding that there was “no reason why

[quarterly fees] should be paid to the United States Trustee instead of to creditors”); *In re Gould*, 437 B.R. 34, 38–39 (Bankr. D. Conn. 2010) (explaining that “no provision of law . . . prevents closing a chapter 11 case before payment of the [UST’s quarterly fees]”) (citing *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 539 (Bankr. E.D. Ky. 1997)). Keeping the Affiliate Cases open at this point serves no legally cognizable purpose, and entry of the Final Decree will allow the Reorganized Debtors to avoid incurring unnecessary costs while continuing to pay the quarterly fees for the Lead Case.

21. The Reorganized Debtors believe the relevant factors support finding the Affiliate Cases have been fully administered within the meaning of section 350(a) of the Bankruptcy Code, and entry of the Final Decree is appropriate at this time for each Affiliate Case. Accordingly, the Reorganized Debtors request that the Court enter the Final Decree closing each of the Affiliate Cases while retaining jurisdiction over any and all matters pending or hereafter arising in the Chapter 11 Cases.

NOTICE

22. Notice of this Motion has been provided in accordance with the procedures set forth in the *Final Order Implementing Certain Notice and Case Management Procedures* [Docket No. 175] and the Confirmation Order. The Debtors respectfully submit that no further notice is required.

NO PREVIOUS REQUEST

23. No previous request for the relief sought herein has been made by the Reorganized Debtors to this or any other court.

CONCLUSION

WHEREFORE, the Reorganized Debtors respectfully request entry of the Final Decree granting the relief requested herein and granting such other relief as is just.

Dated: New York, New York
July 22, 2025

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Counsel for the Reorganized Debtors

EXHIBIT A

Final Decree

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

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In re:	: Chapter 11
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GOL LINHAS AÉREAS INTELIGENTES S.A.,	: Case No. 24-10118 (MG)
<i>et al.</i> , ¹	:
	:
Reorganized Debtors.	: (Jointly Administered)
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FINAL DECREE CLOSING CERTAIN CHAPTER 11 CASES

Upon consideration of the motion (the “Motion”)² of the Reorganized Debtors, seeking entry of a final decree pursuant to section 350(a) of the Bankruptcy Code and Bankruptcy Rule 3022, (i) closing the Affiliate Cases while keeping the Lead Case open for any outstanding matter that must be addressed by the Court and (ii) granting certain related relief, all as described more fully in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and it appearing that venue of these Chapter 11 Cases and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and all of the proceedings had before the Court; and this Court having

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

determined that the relief requested in the Motion is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Each Affiliate Case identified on Schedule 1 hereto shall be closed, effective as of the date of entry of this Final Decree.
3. The Clerk of Court shall enter this Final Decree on the dockets of each of the Affiliate Cases, and thereafter such dockets shall be marked as “Closed.”
4. Entry of this Final Decree is without prejudice to the rights of the Reorganized Debtors or any party in interest to (i) seek to reopen any Affiliate Case for cause pursuant to section 350(b) of the Bankruptcy Code and (ii) dispute, object to, or resolve all Claims filed in the Chapter 11 Cases.
5. All pending and future matters relating to the Chapter 11 Cases, including fee applications and objections to Claims, shall be administered and heard in the Lead Case.
6. To the extent not already paid, the Reorganized Debtors shall pay the U.S. Trustee any quarterly fees due pursuant to 28 U.S.C. § 1930, together with any applicable interest due pursuant to 31 U.S.C. § 3717, within 25 days of the entry of this Final Decree. Within 20 days after entry of this Final Decree, the Reorganized Debtors shall provide the U.S. Trustee with all information indicating cash disbursements for the second quarter of 2025 and for any additional period concluding on or before the date that this Final Decree is entered.
7. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Final Decree.

8. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Final Decree. Further, the Court shall retain jurisdiction over any matter pending in the Chapter 11 Cases, including as provided in the Plan.

Dated: _____, 2025
New York, New York

THE HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Affiliate Cases To Be Closed

Affiliate Cases

Debtor Name	Case Number
GOL Linhas Aéreas S.A.	24-10119
GTX S.A.	24-10121
GAC, Inc.	24-10120
Gol Finance (Luxembourg)	24-10117
Gol Finance (Cayman)	24-10122
Smiles Fidelidade S.A.	24-10124
Smiles Viagens e Turismo S.A.	24-10125
Smiles Fidelidade Argentina S.A.	24-10126
Smiles Viajes y Turismo S.A.	24-10127
Capitânia Air Fundo de Investimento Multimercado Crédito Privado Investimento no Exterior	24-10128
Sorriso Fundo de Investimento em Cotas de Fundos de Investimento Multimercado Crédito Privado Investimento no Exterior	24-10130
Gol Equity Finance	24-10131