

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FLOAT Alaska, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 26-10075 (CTG)

(Jointly Administered)

Hearing Date: March 25, 2026 at 10:00 a.m. (ET)

Objection Deadline: March 18, 2026, at 4:00 p.m. (ET)

**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR AN ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT
AND RETENTION OF LOWENSTEIN SANDLER LLP AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,
EFFECTIVE AS OF FEBRUARY 11, 2026**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the bankruptcy cases of the above-captioned debtors (the “Debtors”), hereby submits this application (the “Application”), pursuant to sections 328 and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), for the entry of an order authorizing and approving the employment and retention of Lowenstein Sandler LLP (“Lowenstein Sandler”) as lead counsel for the Committee, effective as of February 11, 2026. In support of this Application, the Committee submits the *Declaration of Gianfranco Finizio in Support of Application of the Official Committee of Unsecured Creditors for an Order Authorizing and Approving the*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal EIN, are: FLOAT Alaska LLC (3705), Corvus Alaska Holdings Inc. (9732), FLOAT Alaska Holdings LLC (8617), FLOAT Alaska IP LLC (1986), New Pacific Airlines, Inc. (7666), FlyCoin, Inc. (2816), and FLOAT Shuttle Inc. (4269). The Debtors’ mailing address is 101 W Mission Blvd, #110-201, Pomona, CA 91766.

Employment and Retention of Lowenstein Sandler LLP as Counsel, Effective as of February 11, 2026 (the “Finizio Declaration”), a partner of Lowenstein Sandler, attached hereto as **Exhibit A**, and respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* dated February 29, 2012 (Sleet, C.J.). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are sections 328(a) and 1103 of the Bankruptcy Code, Rule 2014(a) of the Bankruptcy Rules, and Rule 2014-1 of the Local Rules.

BACKGROUND

3. On January 26, 2026 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Court”) commencing these cases (the “Chapter 11 Cases”). No trustee or examiner has been appointed in the Chapter 11 Cases.

4. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors continue to manage their properties and operate their businesses as debtors in possession.

5. On February 11, 2026, the Office of the United States Trustee appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code. [D.I. 57]. The Committee is comprised of two members: (i) Intelsat Inflight LLC; and (ii) Regent Aerospace Corp. Also on February 11, 2026, the Committee selected Lowenstein Sandler to serve as its lead counsel and Morris James LLP (“Morris James”) to serve as its Delaware counsel.

6. Information regarding the Debtors' history, business operations, capital structure, secured indebtedness, and the events leading up to the commencement of these Chapter 11 Cases can be found in the *Declaration of Thomas Hsieh in Support of Chapter 11 Petitions and First Relief* [D.I. 9] (the "First Day Declaration").

RELIEF REQUESTED

7. By this Application, the Committee respectfully requests the entry of an order authorizing and approving the employment and retention of Lowenstein Sandler as its counsel to perform legal services relating to the Chapter 11 Cases, effective as of February 11, 2026.

8. The Committee believes that it is necessary to employ attorneys to render the professional services described herein, and that without such professional assistance, neither the Committee's evaluation of the operations of the Debtors nor its meaningful participation in the negotiation, promulgation, and evaluation of any sale of assets or plan of liquidation or reorganization would be possible.

9. Pursuant to section 1103(b) of the Bankruptcy Code, an attorney employed to represent an official committee may not, while employed by such committee, represent any other entity having an adverse interest in connection with the case. Lowenstein Sandler has advised the Committee that Lowenstein Sandler does not hold or represent any other entity having an adverse interest in connection with the Chapter 11 Cases, and does not have any connections with the Bankruptcy Judge presiding over the Chapter 11 Cases, the United States Trustee for Region 3 or any person employed by the Office of the United States Trustee, except as set forth in the Finizio Declaration, submitted herewith and setting forth Lowenstein Sandler's connections with the Debtors, their creditors, and other parties-in-interest in the Chapter 11 Cases.

10. The Committee selected Lowenstein Sandler because of its attorneys' experience and knowledge in bankruptcy matters. The Committee believes that Lowenstein Sandler is well qualified to represent the Committee in the Chapter 11 Cases. Lowenstein Sandler has represented official committees of unsecured creditors in numerous chapter 11 cases in this District, including, without limitation: *In re Boundless Broadband, LLC*, Case No. 25-10948 (BLS) (Bankr. D. Del. July 22, 2025); *In re CHG US Holdings LLC*, Case No. 25-10851 (MFW) (Bankr. D. Del. July 9, 2025); *In re One Table Restaurant Brands LLC*, Case No. 24-11553 (KBO) (Bankr. D. Del. July 17, 2024); *In re Mountain Sports LLC*, Case No. 24-11385 (MFW) (Bankr. D. Del. June 18, 2024); *In re New Rue21 Holdco, Inc.*, Case No. 24-10939 (BLS) (Bankr. D. Del. May 2, 2024); *In re Pegasus Home Fashions, Inc.*, Case No. 23-11235 (MFW) (Bankr. D. Del. Aug. 24, 2023); *In re Proterra, Inc.*, Case No. 23-11120 (BLS) (Bankr. D. Del. Aug. 7, 2023); *In re Williams Industrial Services Group, Inc.*, Case No. 23-10961 (BLS) (Bankr. D. Del. July 22, 2023); *In re Lucira Health, Inc.*, Case No. 23-10242 (MFW) (Bankr. D. Del. Feb. 22, 2023); *In re Gold Standard Baking*, Case No. 22-10559 (JKS) (Bankr. D. Del. June 22, 2022); *In re Avadim Health, Inc.*, Case No. 21-10883 (CTG) (Bankr. D. Del. May 31, 2021); *In re Knotel, Inc.*, Case No. 21-10146 (MFW) (Bankr. D. Del. Jan. 31, 2021); *In re Arandell Holdings, Inc.*, Case No. 20-11941 (JTD) (Bankr. D. Del. Aug. 13, 2020); *In re: GNC Holdings, Inc.*, Case No. 20-11662 (KJC) (Bankr. D. Del. June 23, 2020); *In re Maines Paper & Food Service, Inc.*, Case No. 20-11502 (KBO) (Bankr. D. Del. June 10, 2020); *In re Exide Holdings, Inc.*, Case No. 20-11157 (CSS) (Bankr. D. Del. May 19, 2020); *In re Hygea Holdings Corp.*, Case No. 20-10361 (KBO) (Bankr. D. Del. Feb. 19, 2020); *In re: Bumble Bee Parent, Inc.*, Case No. 19-12502 (LSS) (Bankr. D. Del. Nov. 21, 2019); *In re Fred's, Inc.*, Case No. 19-11984 (CSS) (Bankr. D. Del. Sept. 9, 2019); *In re SportCo Holdings, Inc.*, Case No. 19-11299 (LSS)

(Bankr. D. Del. June 10, 2019); *In re Southeastern Metal Products LLC*, Case No. 19-10989 (BLS) (Bankr. D. Del. May 6, 2019); *In re Orchids Paper Company*, Case No. 19-10729 (MFW) (Bankr. D. Del. Apr. 1, 2019).

11. The professional services that Lowenstein Sandler will provide to the Committee include, but are not limited to:

- (a) advising the Committee with respect to its rights, duties, and powers in the Chapter 11 Cases;
- (b) assisting and advising the Committee in its consultation with the Debtors relative to the administration of the Chapter 11 Cases;
- (c) assisting the Committee in analyzing the claims of the Debtors' creditors and the Debtors' capital structure and in negotiating with holders of claims and equity interests;
- (d) assisting the Committee in its investigation of the acts, conduct, assets, liabilities, and financial condition of the Debtors and of the operation of the Debtors' businesses;
- (e) assisting the Committee in analyzing (i) the Debtors' pre-petition financing, (ii) any proposed DIP financing, and (iii) the adequacy of the Debtors' financing and proposed budget;
- (f) assisting the Committee in its investigation of the liens and claims of the holders of the Debtors' pre-petition debt and the prosecution of any claims or causes of action revealed by such investigation;
- (g) assisting the Committee in its analysis of, and negotiations with, the Debtors or any third party concerning matters related to, among other things, the assumption or rejection of certain leases of nonresidential real property and executory contracts, asset dispositions, sale of assets, financing of other transactions and the terms of one or more plans of liquidation or reorganization for the Debtors and accompanying disclosure statements and related plan documents;
- (h) assisting and advising the Committee as to its communications to unsecured creditors regarding significant matters in the Chapter 11 Cases;
- (i) representing the Committee at hearings and other proceedings;
- (j) reviewing and analyzing applications, orders, statements of operations, and schedules filed with the Court and advising the Committee as to their propriety;

- (k) assisting the Committee in preparing pleadings and applications as may be necessary in furtherance of the Committee's interests and objectives in the Chapter 11 Cases, including without limitation, the preparation of retention papers and fee applications for the Committee's professionals, including Lowenstein Sandler;
- (l) assisting the Committee and providing advice concerning the proposed sale of substantially all of the Debtors' assets, including issues concerning any potential competing bidders and the auction process;
- (m) preparing, on behalf of the Committee, any pleadings, including without limitation, motions, memoranda, complaints, adversary complaints, objections, or comments in connection with any of the foregoing; and
- (n) performing such other legal services as may be required or are otherwise deemed to be in the interests of the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code, Bankruptcy Rules, or other applicable law.

12. Subject to the Court's approval, and pursuant to sections 328, 330, and 331 of the Bankruptcy Code, the Bankruptcy Rules, and the rules and other procedures which this Court may fix, the Committee requests that Lowenstein Sandler be compensated on an hourly basis, plus reimbursement of the actual and necessary expenses that Lowenstein Sandler incurs, in accordance with Lowenstein Sandler's ordinary and customary rates in effect on the date such services are rendered and such expenses are incurred.

13. Lowenstein Sandler's currently hourly rates are as follows:

Partners of the Firm	\$800 – \$2,300
Of Counsel	\$955 – \$1,685
Senior Counsel (generally 12 or more years' experience)	\$710 – \$1,695
Counsel (generally 7 or more years' experience)	\$670 – \$1,600
Associates (generally fewer than 7 years' experience)	\$590 – \$1,450
Paralegals, Practice Support and Assistants	\$255 – \$540

14. The hourly charges set forth above are based upon the experience and expertise of the attorney or legal assistant involved. The hourly rates set forth above are subject to periodic adjustments, which occur annually on or about January 1, to reflect economic and other conditions. Lowenstein Sandler will advise the Debtors, the Committee and the United States Trustee for the District of Delaware (the "U.S. Trustee") of any increases in its hourly rates. Pursuant to Local Bankruptcy Rule 2014-1, Lowenstein Sandler will file and serve a supplemental declaration setting forth any additional material information relating to its employment promptly after learning of any such material information.

15. Lowenstein Sandler will maintain detailed and contemporaneous records of time and any necessary costs and expenses incurred in connection with rendering the legal services described above. It is Lowenstein Sandler's policy to charge its clients in all areas of practice for all disbursements and expenses incurred in the rendition of services. These disbursements and expenses include, among other things, costs for telephone and facsimile charges, photocopying, travel, business meals, computerized research, messengers, couriers, postage, witness fees and other fees related to trials and hearings (including transcripts).²

16. The Committee understands that any compensation and expenses paid to Lowenstein Sandler must be approved by the Court upon application consistent with the Bankruptcy Code, applicable Bankruptcy Rules, the Local Rules, the U.S. Trustee Guidelines, and any orders of the Court respecting compensation of professionals.

² Lowenstein Sandler may hire temporary and/or contract attorneys who may perform services in connection with the Chapter 11 Cases. Lowenstein Sandler submits that payments made to temporary/contract attorneys do not constitute a division or sharing of compensation that is prohibited by statute and makes this voluntary disclosure in an abundance of caution. Lowenstein Sandler will not charge a markup to the Committee with respect to fees billed by such attorneys and they will be recorded as an expense on Lowenstein Sandler's invoices.

17. By separate application, the Committee is also seeking approval to employ Morris James to serve as its Delaware counsel in the Chapter 11 Cases.

18. The Committee believes that if the Court approves the employment of Lowenstein Sandler and Morris James, these firms will allocate their delivery of services to the Committee so as to avoid any unnecessary duplication of services. Moreover, the Committee believes that the efficient allocation of responsibility for legal matters in the Chapter 11 Cases between Lowenstein Sandler and Morris James will reduce the cost of monitoring these proceedings, as well as the time and expense associated with travel by Lowenstein Sandler with respect to matters that can be handled by Delaware counsel. It is the carefully considered view of the Committee that, considering the size and complexity of the Chapter 11 Cases and the various interests involved, representation of the Committee by Lowenstein Sandler and Morris James is necessary and in the best interests of the Committee.

19. The Committee is seeking to retain Lowenstein Sandler effective as of February 11, 2026. Such relief is warranted by the extraordinary circumstances presented by the Chapter 11 Cases, including imminent deadlines set forth in the Debtors' DIP financing package. The Third Circuit has identified "time pressure to begin service" and absence of prejudice as factors favoring *nunc pro tunc* retention. *See Matter of Arkansas Co.*, 798 F.2d 645, 650 (3d Cir. 1986). Lowenstein Sandler was required to focus immediate attention on time-sensitive matters and promptly devote substantial resources to the representation of the Committee upon its retention and pending submission and approval of this Application.

LOWENSTEIN SANDLER'S DISINTERESTEDNESS

20. To the best of the Committee's knowledge, while Lowenstein Sandler represents certain parties in interest on wholly unrelated matters, it does not represent any entity having an

adverse interest in connection with the Chapter 11 Cases, is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code, and does not represent or hold any interest adverse to the interests of the Debtors’ estates.

21. As more fully set forth in the Finizio Declaration, Lowenstein Sandler reviewed the list of interested persons and entities provided by the Debtors, and ran the list of relevant parties in interest included on **Schedule 1** to the Finizio Declaration through its conflicts system. Lowenstein Sandler’s conflict search resulted in the disclosures set forth on **Schedule 2** to the Finizio Declaration. Lowenstein Sandler does not represent, or have any other connection with, any of the parties in interest listed on **Schedule 1**, subject to the disclosures set forth below and in the Finizio Declaration. While employed by the Committee, Lowenstein Sandler will not represent any entity having an adverse interest to the Committee in connection with these Chapter 11 Cases.

22. The Committee is aware that Lowenstein Sandler currently represents certain interested parties in matters unrelated to the Chapter 11 Cases, as further identified in the Finizio Declaration and listed on **Schedule 2**. Lowenstein Sandler does not and will not represent any such interested parties in any matter related to the Debtors. The Committee hereby waives any conflict of interest that exists or may exist due to Lowenstein Sandler’s representation of such interested parties in matters unrelated to the Debtors.

23. The Committee does not believe Lowenstein Sandler’s representation of any interested party or its affiliate(s) in unrelated matters will impair Lowenstein Sandler’s ability to represent the Committee as counsel in connection with these Chapter 11 Cases. The Committee has been informed that Lowenstein Sandler will conduct an ongoing review of its files to ensure that no disqualifying circumstances arise. To the extent that Lowenstein Sandler discovers any

connection with any interested party or enters into any new relationship with any interested party, Lowenstein Sandler will promptly supplement its disclosures to the Court.

NOTICE

24. Notice of this Application has been given to (i) the U.S. Trustee; (ii) counsel for the Debtors; and (iii) those persons who have requested notice pursuant to Bankruptcy Rule 2002. The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given.

25. No previous application for the relief sought herein has been made to this or any other Court.

[Signature to follow]

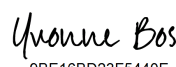
WHEREFORE, the Committee respectfully requests that this Court enter an Order, substantially in the form submitted herewith, authorizing the Committee to retain and employ Lowenstein Sandler as counsel to the Committee, effective as of February 11, 2026, and grant the Committee such other and further relief as the Court deems just or proper.

Dated: February 27, 2026

Respectfully submitted,

**The Official Committee of Unsecured
Creditors of FLOAT Alaska, LLC, *et al.***

DocuSigned by:

By: 

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Yvonne Bos for Intelsat Inflight LLC, solely
in its capacity as the Co-Chair of the Official
Committee of Unsecured Creditors and not in
any other capacity

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FLOAT Alaska, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 26-10075 (CTG)

(Jointly Administered)

Hearing Date: March 25, 2026 at 10:00 a.m. (ET)

Objection Deadline: March 18, 2026, at 4:00 p.m. (ET)

**DECLARATION OF GIANFRANCO FINIZIO IN SUPPORT OF APPLICATION OF
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER
AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF
LOWENSTEIN SANDLER LLP AS COUNSEL, EFFECTIVE AS OF FEBRUARY 11, 2026**

Gianfranco Finizio hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the law firm of Lowenstein Sandler LLP (“Lowenstein Sandler”), which maintains offices in New York, New Jersey, California, Utah, and Washington, D.C. I am an attorney at law, duly admitted and a member in good standing of the bar of the State of New York. I am admitted to this Court in the Chapter 11 Cases *pro hac vice*.

2. This Declaration is submitted in support of the application (the “Application”)² of the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors-in-possession (collectively, the “Debtors”) for entry of an order authorizing and approving the Committee’s employment and retention of Lowenstein Sandler as lead counsel to the Committee, effective as of February 11, 2026.

3. The professional services that Lowenstein Sandler will provide to the Committee include, but are not limited to:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal EIN, are: FLOAT Alaska LLC (3705), Corvus Alaska Holdings Inc. (9732), FLOAT Alaska Holdings LLC (8617), FLOAT Alaska IP LLC (1986), New Pacific Airlines, Inc. (7666), FlyCoin, Inc. (2816), and FLOAT Shuttle Inc. (4269). The Debtors’ mailing address is 101 W Mission Blvd, #110-201, Pomona, CA 91766.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

- (a) advising the Committee with respect to its rights, duties, and powers in the Chapter 11 Cases;
- (b) assisting and advising the Committee in its consultations with the Debtors relative to the administration of the Chapter 11 Cases;
- (c) assisting the Committee in analyzing the claims of the Debtors' creditors and the Debtors' capital structure and in negotiating with holders of claims and equity interests;
- (d) assisting the Committee in its investigation of the acts, conduct, assets, liabilities, and financial condition of the Debtors and of the operation of the Debtors' businesses;
- (e) assisting the Committee in analyzing (i) the Debtors' pre-petition financing, (ii) any proposed DIP financing, and (iii) the adequacy of the Debtors' financing and proposed budget;
- (f) assisting the Committee in its investigation of the liens and claims of the holders of the Debtors' pre-petition debt and the prosecution of any claims or causes of action revealed by such investigation;
- (g) assisting the Committee in its analysis of, and negotiations with, the Debtors or any third party concerning matters related to, among other things, the assumption or rejection of certain leases of nonresidential real property and executory contracts, asset dispositions, sale of assets, financing of other transactions and the terms of one or more plans of liquidation or reorganization for the Debtors and accompanying disclosure statements and related plan documents;
- (h) assisting and advising the Committee as to its communications to unsecured creditors regarding significant matters in the Chapter 11 Cases;
- (i) representing the Committee at hearings and other proceedings;
- (j) reviewing and analyzing applications, orders, statements of operations, and schedules filed with the Court and advising the Committee as to their propriety;
- (k) assisting the Committee in preparing pleadings and applications as may be necessary in furtherance of the Committee's interests and objectives in the Chapter 11 Cases, including without limitation, the preparation of retention papers and fee applications for the Committee's professionals, including Lowenstein Sandler;
- (l) assisting the Committee and providing advice concerning the proposed sale of substantially all of the Debtors' assets, including issues concerning any potential competing bidders and the auction process;

- (m) preparing, on behalf of the Committee, any pleadings, including without limitation, motions, memoranda, complaints, adversary complaints, objections, or comments in connection with any of the foregoing; and
- (n) performing such other legal services as may be required or are otherwise deemed to be in the interests of the Committee in accordance with the Committee's powers and duties as set forth in the Bankruptcy Code, Bankruptcy Rules, or other applicable law.

4. As of the date of this Declaration, Lowenstein Sandler has not received a retainer or compensation in connection with its proposed representation of the Committee in the Chapter 11 Cases.

5. Subject to the Court's approval, and pursuant to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and any procedures which this Court may fix, Lowenstein Sandler shall seek compensation on an hourly basis, plus reimbursement of its actual and necessary expenses incurred, in connection with representing the Committee in the Chapter 11 Cases. Lowenstein Sandler's compensation shall be in accordance with the ordinary and customary rates which are in effect on the date the services are rendered.

6. Lowenstein Sandler's currently hourly rates are as follows:

Partners of the Firm	\$800 – \$2,300
Of Counsel	\$955 – \$1,685
Senior Counsel (generally 12 or more years' experience)	\$710 – \$1,695
Counsel (generally 7 or more years' experience)	\$670 – \$1,600
Associates (generally fewer than 7 years' experience)	\$590 – \$1,450
Paralegals, Practice Support, and Assistants	\$255 – \$540

7. The hourly charges for the attorneys and legal assistants who will render services to the Committee are based upon the experience and expertise of the attorney or legal assistant involved. The hourly rates set forth above are subject to periodic adjustments, which occur annually on or about January 1, to reflect economic and other conditions. Lowenstein Sandler will advise the Debtors, the Committee and the United States Trustee for the District of

Delaware (the “U.S. Trustee”) of any increases in its hourly rates. Pursuant to Local Rule 2014-1, Lowenstein Sandler will file and serve a supplemental declaration setting forth any additional material information relating to its employment promptly after learning of any such material information.

8. Lowenstein Sandler will maintain detailed, contemporaneous records of time and any necessary costs and expenses incurred in connection with rendering the legal services described above. It is Lowenstein Sandler’s policy to charge its clients in all areas of practice for all disbursements and expenses incurred in the rendition of services. These disbursements and expenses include, among other things, costs for telephone and facsimile charges, photocopying, travel, business meals, computerized research, messengers, couriers, postage, witness fees and other fees related to trials and hearings (including transcripts).³

9. In connection with its proposed retention by the Committee in the Chapter 11 Cases, Lowenstein Sandler undertook to determine whether it had any contacts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtors’ estates and the interests of the Committee with respect to the matters on which it will be engaged.

10. Lowenstein Sandler obtained the names of individuals and entities that may be parties in interest in the Chapter 11 Cases and such parties are listed on **Schedule 1** attached hereto (the “Potential Party List”). Lowenstein Sandler has searched its electronic database for its connections to the entities listed on the Potential Party List.

11. Attached hereto as **Schedule 2** is a list of parties that Lowenstein Sandler may currently represent or may have represented in the past on matters wholly unrelated to the Chapter 11 Cases, professionals that may represent current or former clients of Lowenstein

³ Lowenstein Sandler may hire temporary and/or contract attorneys who may perform services in connection with the Chapter 11 Cases. Lowenstein Sandler submits that payments made to temporary/contract attorneys do not constitute a division or sharing of compensation that is prohibited by statute and makes this voluntary disclosure in an abundance of caution. Lowenstein Sandler will not charge a markup to the Committee with respect to fees billed by such attorneys, and they will be recorded as an expense on Lowenstein Sandler’s invoices.

Sandler, and professionals with whom Lowenstein Sandler may have served as co-counsel, including parties who appear on the Potential Party List.

12. Except as disclosed herein or on **Schedule 2** attached hereto, neither I, Lowenstein Sandler, nor any member, counsel, or associate thereof, insofar as I have been able to ascertain, have any connection with the Debtors, their creditors, or any other parties in interest, their respective attorneys and accountants, the Office of the U.S. Trustee, any person employed in the Office of the U.S. Trustee, or any Bankruptcy Judge currently serving on the United States Bankruptcy Court for the District of Delaware.

13. To the best of my knowledge, none of the entities that appear on Schedule 2 or that have been otherwise disclosed herein, have generated revenue for Lowenstein Sandler in an amount of one percent (1%) or more of Lowenstein Sandler's gross revenue in calendar years 2023, 2024, or 2025.

14. Lowenstein Sandler does not represent the Debtors, or any of the Debtors' current officers and directors, identified on the Potential Party List.

15. To the best of my knowledge, after diligent inquiry, Lowenstein Sandler is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as Lowenstein Sandler, its partners, counsel, and associates: (a) are not creditors, equity security holders, or insiders of the Debtors; (b) are not and were not, within two (2) years before the date of the filing of the Chapter 11 Cases, a director, officer, or employee of the Debtors; and (c) do not represent or hold an interest adverse to the interests of the estates.

16. Lowenstein Sandler, which employs approximately 350 attorneys, has a large and diversified legal practice that encompasses the representation of, and representations adverse to, many entities and individuals, some of which are or may consider themselves to be creditors or parties in interest in the Chapter 11 Cases, or otherwise to have interests in the Chapter 11 Cases.

17. In addition, Lowenstein Sandler likely represents, and may in the future represent, creditors of the Debtors who have not yet been disclosed by the Debtors in matters unrelated to the Debtors, or the Chapter 11 Cases.

18. Lowenstein Sandler, from time to time, may work with, represent, engage, and receive referrals from the attorneys and financial advisors or consultants retained by the Debtors, the various lenders, the Committee or creditors of the Debtors. Lowenstein Sandler currently works with, and has in the past worked with, the professionals engaged by the Debtors and the other professionals retained by the Committee on matters unrelated to the Debtors and the Chapter 11 Cases.

19. Lowenstein Sandler will not represent any entity other than the Committee in matters related to the Chapter 11 Cases.

20. No promises have been received by Lowenstein Sandler or any member, counsel, or associate thereof as to payment or compensation in connection with the Chapter 11 Cases, other than in accordance with the provisions of the Bankruptcy Code. Lowenstein Sandler does not have an agreement with any other entity to share any compensation received by Lowenstein Sandler in connection with the Chapter 11 Cases.

21. The foregoing constitutes the statement of Lowenstein Sandler pursuant to Bankruptcy Rule 2014.

I hereby declare under the penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information and belief.

Dated: February 27, 2026

/s/ Gianfranco Finizio
Gianfranco Finizio, Esq.

Schedule 1
Potential Parties In Interest List

Debtors:

Corvus Alaska Holdings, Inc.
Float Alaska LLC
Float Alaska Holdings LLC
Float Alaska IP LLC
Float Shuttle Inc.
FlyCoin, Inc.
New Pacific Airlines, Inc.

Non-Debtor Affiliates

Float Alaska Real Estate LLC

Directors and Officers:

Josh Jones
Thomas Allison
Thomas Hsieh

Professionals:

Saul Ewing LLP
Sage-Popovich, Inc.
Sherwood Partners Inc.
Stretto, Inc.

Top Creditors:

AAR Supply Chain, Inc
AEG – NP
AeroDesign Services LLC
AerSale, Inc.
Aertek Ltd
Air Station Aviation, Inc.
Alaska Airlines
Alaska Roof Restorations
Barnes & Thornburg LLP
Bischoff Aerospace
BlackRock / Aviation Holdings III
Investments, LLC
Brex Inc.
CAVU Aerospace, Inc.
CliftonLarsonAllen LLP
Cozen O'Connor P.C.
Delta Air Lines, Inc.
Delta Professional Services, LLC
Elite Team Logistics, Inc.

FedEx

Global Security Consulting Group Inc
Intelsat Alliance LP
MonoCoque Diversified Interests
OAKN Holdings DBA Alaska Hydraulics
PASS Charters
Private Jet Services Group, LLC
Red River Aircraft Leasing LLC
Regent Aerospace Corporation
Rolls Royce plc
SkedFlex
State of Alaska – Department of
Transportation and Public Facilities Alaska
International Airport System
State of Alaska – Department of
Transportation and Public Facilities -
Southcoast Region
SysAio
The Boeing Company
TP Aerospace Americas
Trax USA Corp.
Turbo Resources International
Vector Airport Systems, LLC dba Vector
PLANEPASS- US Airports
VT San Antonio Aerospace, Inc.
Willis Towers Watson Northeast, Inc
World Fuel Services, Inc.
Xtreme Aviation, LLC

Secured Lenders and Counsel

Jones Holding, LLC
Orrick, Herrington & Sutcliffe LLP

Insurers:

Atlantic Specialty Insurance Company
Continental Indemnity Company
General Star Indemnity Company
Insurance Company of the West
New Hampshire Insurance Company
Starr Indemnity & Liability Company
Starr Surplus Lines Insurance Company
Sompo International Insurance

Underwriters at Lloyd's (Lloyd's of
London)
XL Specialty Insurance Company

Equity Holders:

8VC Entrepreneurs Fund IV, L.P.
8VC Fund IV, L.P.
Aaron Kusano
Ahmed Abuzaid
Alexander Polvi
Alexander Polvi, Trustee of the Willow
Trust,
Allan Charles Lichtenberg u/a/d 1/23/2001
AltoIRA Custodian FBO Jessica Marcus
SEP IRA
Amber Tyson
Andrew Auyeung
Andy AuYueng
Anu Mariampillai
Arnel Guang
Aurelius Trust dtd 1/31/06
Avenue Investments LLC
Baylor Triplett and Sharon Kwan
Bella Cai
Ben Marcus
Bereket Antonelli
Bilcar LLC
Blockchain Partners, LLC
Brian Topper
Carly Stein
Cee Holdings Trust
Cephas Trust (Peter Chapman)
Charlie Matlack
Christina Rae Stephenson
Garrett Lee Stephenson
Christopher R. Hodge
Conor Hlavinka
Craig Livingston Donaldson IRA
Dallas Kashuba
Daniel and Melinsa Berman Living Trust
2010
Daniel Anderson
Daniel Antonelli
Darryl Jung
Tina Jung
David Armstrong

Julianne Armstrong
David Katz Living Trust dated 23 February
2018
David Lee Murphey
David Leung
David M Perez
David O. Holmes and Carol Ann Holmes
trustees of the Holmes Family Trust
dated July 8, 1998
Directed Trust Company FBO Tregarrick R
Taylor IRA
Donald P. Baker 2000 Trust U/T DTD
August 16, 2000
Donald P. Gould
Donna Cahoon
Larry Cahoon
Edward Jones and Company
Elizabeth L. Myer
Elmer Pineda
Equity Trust Company
Equity Trust Company Custodian FBO
Craig Livingston Donaldson IRA
Eric Johnson
Eric S. Johnson, Trustee, Johnson Family
Trust dated Aug 8, 1997
Fogwell Family Living Trust
Freese Holdings
Gail Sieberts
Gilad Elbaz, as Trustee of the Eytan Elbaz
Legacy Trust under Trust Agreement
Dated Dec 23, 2020
Giuseppe J. Antonelli
Sandra Antonelli
Gjorgi (George) Stojanov
Goren Family Trust (Doron Goren)
Greg Brown and Wanda Brown JT
Revocable Trust
Harborock Ltd. (Kevin Przybocki)
Harvey's FLOAT 2, LLC
Harvey's FLOAT 3, LLC
Harvey's FLOAT, LLC
Harvey's Gaingels FlyCoin LLC
HMC INQ Fund 1, LP
HMC INQ Fund 2, LP
Holi Kao, Trustee of the Kao 2012 Uxor
Trust

Holmes Family Trust
Ian Story
Jacob Antonelli
Jana Weltzin
Jason Umhoefer
Jean Boyd Todd
Jeerreddi Prasad
Jeff Lentfer
Jeffrey A. Huber
Jimmy Quach
John and Jennie Freese
John Civantos
John Freese
John Fries
John P Civantos 2011 Family Trust
Jonathan Rubini
Jones Holding Inc.
Karen Ahle
Kashuba 2009 Trust
Kau Jones Family Trust of 2017
KBC Venture LLC
Keren Zhou
Kevin Milhoan
Kveta Wiener Vojkovska
Kyle Webb
Ladd Elwardani
Laura Mundy
Leonard Moon
Liquid 2 Ventures Fund III, L.P.
Lisa Walker
Lone Star Friends Trust
M.R.L. Kassouf Living Trust 03/03/2005
Madison Trust Company
Ann Margaret Roggenbuck
Mana Ventures-Angelist Santa Clara
Marcus Klassen Aberdeen
Mark C. Stevens
Mark Chapin Johnson
Mark Stagen
Mark Stevens
Marlin J. Kaufman
Martha Frances Besser
Matthew Lau
Michael L. Stoppelman Revocable Trust
Michael Ma
Michael Napoli

Michael Timmcke
Mike Joo
Mike Miller
Miller Community Property Trust
Milner and Ingersoll Family Tr U/A
Ministry of Technology, LLC
MMAD WORX LLC
Montana 1990 Family Trust
Nicholas A. Antonelli
Sarah R. Antonelli
Nicholas A. Utiger
Nicolas White
NOR Fund I-Angelist Santa Clara
P. Josh Sundstrom
Pamela Jean McTavish Revocable Trust
Parashu Capital LLC
Particle Capital, LLC
Patrick J. Lovely
Paul Freese
Bonnie Freese
Paul L. Donaldson
Paul Viboch
Paul Wichorek
Peter AuYeung / Eliza Auyeung
Peter Chapman
Raymond Craig Feeck
Richard B. Todd
Richard Jones
Richard Jones, Trustee of The Kau Jones
Family Trust of 2017
Rob McKinney
Robert C. Williams
Robert J Cowan
Deborah Cowan
Robert Keith Wiener
Robert McKinney
Rocking Haam LP
Ryan Caswell
Danielle Caswell
Sapiens Partners LLC
Scott D. Sugino
Sea Lake Baldwin LLC
Sergey Tsalkov
Shea Family Revocable Living Trust
Sheireen Huang
Sheireen Leslie Kau Huang

Sierra Leone Trust
SNJ Investments, LLC
Stanley L. Blend (Lone Star Friends Trust)
StarCheck West Limited
Stephen and Paige Miyabe
Stephen Swiatkiewicz
TenOneTen Ventures LLC
The Adamyk Family Trust
The Ayers Family Trust
The Harmetz Living Trust
Holmes Family Trust
The Seabright Revocable Trust
Thomas W. Turney Living Trust
Timothy C. Houghtaling
Timothy J. Kirley, Trustee
Timothy McTavish,
Tyson Mercure
Vincent AuYueng
Walter J Wilcox
Walter J. Wilcox II
Wanda Brown
Webb Investments, LLC
William St. Pierre Sr.
William St. Pierre, Jr.
William Iwata
William Stewart Besser
Zestivinal Zoubek, DDS

Taxing Authorities:

California Department of Tax and Fee
Administration
Canada Revenue Agency
Delaware Department of State
Internal Revenue Service
United States Department of Agriculture
United States Customs and Border
Protection
Transportation Security Administration
Municipality of Anchorage

Landlords:

Alaska Department of Transportation and
Public Facilities
Alaska Department of Public Works,
Division of Aviation
LFR, LLC

Lane Aviation Corporation
Tanadgusix Corporation
Strawberry Hill, LLC
Frontier Hangar Group, LLC

Other:

ADP, LLC
AFCO Credit Corporation
Alliant Insurance Services, Inc.
Airline Pilots Association
Aleutian Airlines
Associated Energy Group
Cobbs Allen Capital Holdings, LLC
Federal Aviation Administration
Hartford Fire Insurance Company
JPMorgan Chase Bank, N.A.
M&T Bank
NFS Capital, LLC
Northrim Bank
TriNet Group, Inc.
United States Department of Transportation

**Judges in the US Bankruptcy Court for
the District of Delaware:**

Chief Judge Karen B. Owens
Judge Brendan L. Shannon
Judge Craig T. Goldblatt
Judge J. Kate Stickles
Judge John. T. Dorsey
Judge Laurie Selber Silverstein
Judge Mary F. Walrath
Judge Thomas M. Horan

**Office of the United States Trustee –
(Region 3) Delaware**

Benjamin Hackman
Christine Green
Edith A. Serrano
Elizabeth Thomas
Hannah M. McCollum
Hawa Konde
Holly Dice
James R. O'Malley
Jane Leamy
Jonathan Lipshie
Jonathan Nyaku

Joseph Cudia
Joseph McMahon
Lauren Attix
Linda Casey
Malcolm M. Bates
Michael Girello
Nyanquoi Jones
Shakima L. Dortch
Timothy J. Fox, Jr.

SCHEDULE 2

<u>Entity</u>	<u>Relationship to Debtors</u> ^[2]	<u>Relationship to Lowenstein Sandler</u>
BlackRock / Aviation Holdings II Investments, LLC	Creditor	Lowenstein Sandler represents a subsidiary of BlackRock on unrelated matter(s).
Alliant Insurance Services, Inc.	Other/Not Classified	Current client of Lowenstein Sandler on unrelated matter(s).
Sherwood Partners, Inc.	Professional	Current client of Lowenstein Sandler on unrelated matter(s).
AltoIRA Custodian FBO Jessica Marcus	Equity Holder	Former client of Lowenstein Sandler on unrelated matter(s).
Angelist Santa Clara	Equity Holder	Lowenstein Sandler represents Angellist LLC (not Angelist Santa Clara) on unrelated matter(s).
Mike Miller	Equity Holder	Lowenstein Sandler represents an individual named Mike Miller on unrelated matter(s). Out of an abundance of caution, Lowenstein Sandler is including this disclosure.

^[2] This schedule is for disclosure purposes only and uses the Debtors' description of the relationship to the Debtors, where available. The Committee expressly reserves all rights, including, without limitation, with respect to the nature, extent and validity of any party's alleged lien or claim.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FLOAT Alaska, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 26-10075 (CTG)

(Jointly Administered)

Hearing Date: March 25, 2026 at 10:00 a.m. (ET)

Objection Deadline: March 18, 2026, at 4:00 p.m. (ET)

**ORDER AUTHORIZING AND APPROVING THE EMPLOYMENT AND
RETENTION OF LOWENSTEIN SANDLER LLP AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, EFFECTIVE AS OF FEBRUARY 11, 2026**

Upon consideration of the application (the “Application”)² of the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors (the “Debtors”) for authorization to employ and retain Lowenstein Sandler LLP (“Lowenstein Sandler”) to serve as counsel for the Committee, effective as of February 11, 2026; and upon consideration of the Cohen Declaration; and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334(b) and 157; and the Court having found that venue of the Chapter 11 Cases and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that notice of the Application has been given as set forth in the Application and that such notice is adequate and no other or further notice need be given; and the Court having

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal EIN, are: FLOAT Alaska LLC (3705), Corvus Alaska Holdings Inc. (9732), FLOAT Alaska Holdings LLC (8617), FLOAT Alaska IP LLC (1986), New Pacific Airlines, Inc. (7666), FlyCoin, Inc. (2816), and FLOAT Shuttle Inc. (4269). The Debtors’ mailing address is 101 W Mission Blvd, #110-201, Pomona, CA 91766.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

determined that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that Lowenstein Sandler does not hold or represent an interest adverse to the Debtors' estates, and is a disinterested person under section 101(14) of the Bankruptcy Code; and the Court having found that the employment and retention of Lowenstein Sandler is necessary and in the best interest of the Committee; and after due deliberation and sufficient cause appearing therefor,

It is hereby **ORDERED** as follows:

1. The Application is granted as set forth herein.
2. Pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014 and Rule 2014-1 of the Local Rules, the Committee is authorized and empowered to employ and retain Lowenstein Sandler, effective as of February 11, 2026, to serve as its counsel in the Chapter 11 Cases.
3. Lowenstein Sandler shall apply for and be compensated for professional services rendered and reimbursement of expenses in connection with the Chapter 11 Cases in compliance with sections 328, 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Rules, any applicable orders entered by this Court in respect of compensation of professionals and any case-specific fee protocols approved by the Court, after notice and a hearing pursuant to any other applicable procedures and orders of the Court.
4. Lowenstein Sandler shall provide ten days' notice to the Debtors, the U.S. Trustee, and the Committee before any increases in the rates set forth in the Application and shall file such notice with the Court.
5. The Committee is authorized and empowered to take all actions necessary to effectuate the relief granted by this Order.

6. Notwithstanding the possible applicability of Bankruptcy Rules 6004, 7062, 9014, or otherwise, or any Local Rule that might otherwise delay the effectiveness of this Order, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. To the extent Lowenstein Sandler uses the services of temporary or contract attorneys (collectively, the “Contractors”) to perform any services in connection with the Chapter 11 Cases, Lowenstein Sandler shall ensure that the Contractors are subject to the same conflicts checks as required for Lowenstein Sandler, and file with this Court such disclosures required by Bankruptcy Rule 2014(a) with respect to such Contractors, and Lowenstein Sandler shall (i) pass through the cost of such Contractors to the Debtors at the same rate that Lowenstein Sandler pays the Contractors, and (ii) seek reimbursement for actual costs of the Contractors only.

8. This Court shall retain jurisdiction over any and all matters arising from or relating to the interpretation of implementation of this Order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FLOAT Alaska LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 26-10075 (CTG)

(Jointly Administered)

Obj. Deadline: March 18, 2026 at 4:00 p.m. (ET)

Hearing Date: March 25, 2026 at 10:00 a.m. (ET)

**NOTICE OF APPLICATION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR AN ORDER AUTHORIZING AND
APPROVING THE EMPLOYMENT AND RETENTION OF LOWENSTEIN
SANDLER LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS, EFFECTIVE AS OF FEBRUARY 11, 2026**

PLEASE TAKE NOTICE that on February 27, 2026, the Official Committee of Unsecured Creditors (the “Committee”) of FLOAT Alaska LLC, *et al.*, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Application of the Official Committee of Unsecured Creditors for an Order Authorizing and Approving the Employment and Retention of Lowenstein Sandler LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of February 11, 2026* (the “Application”).

PLEASE TAKE FURTHER NOTICE that, objections, if any, to the Application or the relief requested therein must be filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **March 18, 2026 at 4:00 p.m. (ET)**. At the same time, you must serve a copy of the objection so as to be received on or before the Objection Deadline upon the proposed undersigned counsel to the Committee.

PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE APPLICATION WILL BE HELD ON MARCH 25, 2026 AT 10:00 A.M. (ET) BEFORE THE HONORABLE CRAIG T. GOLDBLATT, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal EIN, are: FLOAT Alaska LLC (3705), Corvus Alaska Holdings Inc. (9732), FLOAT Alaska Holdings LLC (8617), FLOAT Alaska IP LLC (1986), New Pacific Airlines, Inc. (7666), FlyCoin, Inc. (2816), and FLOAT Shuttle Inc. (4269). The Debtors’ mailing address is 101 W Mission Blvd, #110-201, Pomona, CA 91766.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS OR RESPONSES TO THE APPLICATION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 27, 2026

MORRIS JAMES LLP

/s/ Siena B. Cerra

Eric J. Monzo (DE Bar No. 5214)
Siena B. Cerra (DE Bar No. 7290)
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Wilmington, DE 19803
Telephone: (302) 888-6800
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scerra@morrisjames.com

-and-

LOWENSTEIN SANDLER LLP

Jeffrey L. Cohen (admitted *pro hac vice*)
Gianfranco Finizio (admitted *pro hac vice*)
Jake A. Rauchberg (DE Bar No. 7444)
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 262-6700
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gfinizio@lowenstein.com
jrauchberg@lowenstein.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors*