

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re: § Chapter 11  
ERICKSON INCORPORATED, *et al.*,<sup>1</sup> §  
§ Case No. 16-34393  
§  
Debtors. § (Jointly Administered)

**OBJECTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION, AS  
INDENTURE TRUSTEE, TO CONFIRMATION OF THE SECOND AMENDED  
JOINT PLAN OF REORGANIZATION OF ERICKSON INCORPORATED, ET AL.**

Wilmington Trust, National Association, as indenture trustee and notes collateral agent (“Wilmington Trust”) for the 8.25% Second Priority Senior Secured Notes due 2020 issued by Erickson Incorporated (f/k/a Erickson Air-Crane Incorporated), by its undersigned attorneys, files this objection to confirmation of the Second Amended Joint Plan of Reorganization of Erickson Incorporated, Et Al., Pursuant to Chapter 11 of the Bankruptcy Code (the “Plan”) and in support thereof states as follows:

1. Wilmington Trust hereby objects to the Plan and puts the Debtors to their proof regarding the requirements for confirmation of the Plan.
2. Wilmington Trust reserves the right to amend or supplement this objection.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Erickson Incorporated (7561); EAC Acquisition Corporation (3733); Erickson Helicopters, Inc. (5052); Erickson Transport, Inc. (9162); Evergreen Helicopters International, Inc. (1311); Evergreen Equity, Inc. (9209); and Evergreen Unmanned Systems, Inc. (3961) (collectively, the “Debtors”). The location of the Debtors’ service address is 5550 SW Macadam Avenue, Suite 200, Portland, OR 97239.



WHEREFORE, Wilmington Trust respectfully requests that confirmation of the Plan be denied.

Dated: New York, New York  
February 22, 2017

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*Attorneys for Wilmington Trust, National  
Association, as indenture trustee for the 8.25%  
Second Priority Senior Secured Notes due 2020  
issued by Erickson Incorporated*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants, as identified on the Notice of Electronic File (“NEF”).

*/s/ Edward M. Fox*

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