

Hearing Date: April 21, 2016 at 9:00 a.m. (Eastern)
Objection Deadline: April 15, 2016 at 10:00 a.m. (Eastern) (by Extension)

LEVY RATNER, P.C.

Ryan J. Barbur, Esq.
80 Eighth Avenue, 8th Floor
New York, New York 10011-5126
Telephone: (212) 627-8100
Facsimile: (212) 627-8182
rbarbur@levyratner.com

*Attorneys for International Brotherhood of Teamsters,
Airline Division*

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

In re)	Chapter 11
REPUBLIC AIRWAYS HOLDINGS INC., <i>et al.</i> ,)	Case No. 16-10429 (SHL)
Debtors.)	Jointly Administered
)	

**JOINDER AND RESERVATION OF RIGHTS OF THE INTERNATIONAL
BROTHERHOOD OF TEAMSTERS, AIRLINE DIVISION, TO THE LIMITED
OMNIBUS OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO THE DEBTORS' MOTIONS TO
(I) ASSUME DELTA AGREEMENTS AND SETTLE DELTA CLAIMS AND
(II) AUTHORIZE THE DEBTORS TO OBTAIN POSTPETITION FINANCING
PROVIDED BY DELTA**

The International Brotherhood of Teamsters, Airline Division (the “**IBT**”), creditors and parties in interest in the above captioned cases, by and through its undersigned counsel, hereby (a) joins the *Limited Objection of the Official Committee of Unsecured Creditors to the Debtors’ Motions to (I) Assume Delta Agreements and Settle Delta Claims and (II) Authorize the Debtors to Obtain Post-Petition Financing Provided by Delta* (the “**Committee Objection**”) [Docket No. 364], (b) incorporates by reference all factual and legal arguments set forth therein, and (c) reserves its rights to further object to *Debtors’ Motion Pursuant to Sections 363(b), 363(m), and*

365(a) of the Bankruptcy Code and Bankruptcy Rules 6004, 6006 and 9019 for Authorization to (I) Assume Codeshare and Related Agreements, as Amended, with Delta Air Lines, Inc., (II) Lease Certain Property of the Estate and (III) Settle Claims Between Delta Air Lines, Inc. and the Debtors (the “Settlement Motion”) [Docket No. 244] and the Debtors’ Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105, 361, 362(d)(1), 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d), 364(e), 503(b)(1) and 507(b) and Fed. R. Bankr. P. 4001 and 6004 (I) Authorizing Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Status, (III) Modifying the Automatic Stay and (IV) Granting Related Relief (the “DIP Motion” and, together with the Settlement Motion, the “Delta Motions”) [Docket No. 246].

For the reasons set forth in the Committee Objection, the IBT respectfully requests that this Court adjourn the hearing regarding the Delta Motions, or, in the alternative, deny the Settlement Motion and DIP Motion without prejudice to the Debtors’ ability to refile upon reaching a settlement with another Code Share Partner.

Dated: April 15, 2016
New York, New York

LEVY RATNER, P.C.

By: /s/ Ryan J. Barbur
Ryan J. Barbur, Esq.
Attorneys for International
Brotherhood of Teamsters,
Airline Division
80 Eighth Avenue, 8th Floor
New York, New York 10011
(212) 627-8100
(212) 627-8182 (fax)