

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
N888JK LIMITED, :
 :
 Plaintiff, :
 :
 - against - :
 :
 EQUIOM (ISLE OF MAN) LIMITED AS TRUSTEE :
 OF ANAP AIRCRAFT OWNERSHIP TRUST, :
 :
 Defendant. :
 :
 -----X

Index No. 652122/2020

**REPLY TO
COUNTERCLAIM**

Plaintiff N888JK Limited (“Plaintiff”), by its attorneys, Smith, Gambrell & Russell, LLP, as and for its Reply to the Counterclaim (the “Counterclaim”) of Defendant Equiom (Isle of Man) Limited as Trustee of ANAP Aircraft Ownership Trust (“Defendant”), hereby states as follows:

1. Admits the truth of paragraphs 59 through 61 of the Counterclaim.
2. In response to paragraph 62 of the Counterclaim, respectfully directs the Court to the Purchase Agreement for its terms.
3. In response to paragraph 63 of the Counterclaim, repeats the statements set forth in paragraphs 1 and 2 hereof.
4. In response to paragraph 64 of the Counterclaim, respectfully directs the Court to the Purchase Agreement for its terms.
5. Lacks knowledge or information sufficient to form a belief as to paragraphs 65 through 67 of the Counterclaim.

6. As to the remainder of the Counterclaim, which constitutes the prayer for relief, denies that Defendant is entitled to any relief.

Dated: New York, New York
August 11, 2020

SMITH, GAMBRELL & RUSSELL, LLP



By: _____
John G. McCarthy

Attorneys for Plaintiff
1301 Avenue of the Americas, 21st Floor
New York, New York 10019
Tel: (212) 907-9700
Fax: (212) 907-9800
jmccarthy@sgrlaw.com

To: Judith A. Archer, Esq.
David B. Schwartz, Esq.
M. Hannah Koseki, Esq.
NORTON ROSE FULBRIGHT US LLP
Attorneys for Defendant
1301 Avenue of the Americas
New York, New York 10019
Tel: (212) 318-3000
Fax: (212) 318-3400
Judith.archer@nortonrosefulbright.com
David.schwartz@nortonrosefulbright.com
Hannah.kosecki@nortonrosefulbright.com