

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

----- X
:
In re: : Chapter 11
:
GLOBAL EAGLE ENTERTAINMENT : Case No. 20-11835 (JTD)
INC., *et al.*,¹ :
: (Jointly Administered)
Debtors. :
: **Re: Docket Nos. 577 and 578**
----- X

NOTICE OF DISCLOSURE STATEMENT HEARING

TO: ALL HOLDERS OF CLAIMS OR INTERESTS AGAINST GLOBAL EAGLE ENTERTAINMENT INC. AND ITS AFFILIATED DEBTORS AND DEBTORS IN POSSESSION AND ALL OTHER PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER 11 CASES

PLEASE TAKE NOTICE that, on July 22, 2020, Global Eagle Entertainment Inc. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), each commenced a case under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”).

PLEASE TAKE NOTICE that, on November 13, 2020, the Debtors filed their (i) *Joint Plan of Liquidation for Global Eagle Entertainment Inc. and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 577] (as may be amended from time to time, the “**Plan**”)² and (ii) *Disclosure Statement for Joint Plan of Liquidation for Global Eagle Entertainment Inc. and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code* [Docket No. 578] (as may be amended from time to time, the “**Disclosure Statement**”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number are: Global Eagle Entertainment Inc. (7800), Airline Media Productions, Inc. (2314), Emerging Markets Communications, LLC (0735), Entertainment in Motion, Inc. (3908), Global Eagle Entertainment Operations Solutions, Inc. (3375), Global Eagle Services, LLC (7899), Global Eagle Telecom Licensing Subsidiary LLC (2547), IFE Services (USA), Inc. (2120), Inflight Productions USA Inc. (8493), Maritime Telecommunications Network, Inc. (9974), MTN Government Services, Inc. (6069), MTN International, Inc. (8559), MTN License Corp. (0314), N44HQ, LLC (0570), Post Modern Edit, Inc. (6256), Row 44, Inc. (2959), and The Lab Aero, Inc. (9831). The Debtors’ address is 1821 E. Dyer Road, Suite 125, Santa Ana, California 92705.

² Capitalized terms used but not otherwise defined herein have the meanings set forth in the Plan.

PLEASE TAKE FURTHER NOTICE that on or before November 20, 2020 the Debtors intend to file the *Motion of Debtors For Order (A) Approving the Disclosure Statement, (B) Establishing the Voting Record Date, Voting Deadline, and Other Dates, (C) Approving Procedures for Soliciting, Receiving, and Tabulating Votes on the Plan and for Filing Confirmation Objections, (D) Approving the Manner and Forms of Notice and Other Related Documents, and (E) Granting Related Relief* (the “**Disclosure Statement Motion**”).

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Judge John T. Dorsey, United States Bankruptcy Judge, on **December 16, 2020 at 3:00 p.m. (Prevailing Eastern Time)**, in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom 5, Wilmington, Delaware 19801 (or via telephonic or other electronic means, as the Bankruptcy Court may direct) (the “**Disclosure Statement Hearing**”), to consider approval of the Disclosure Statement and the other relief to be requested in the Disclosure Statement Motion. Please be advised that the Disclosure Statement Hearing may be continued from time to time by the Bankruptcy Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Bankruptcy Court and served on such parties as the Bankruptcy Court may order.

PLEASE TAKE FURTHER NOTICE that if you would like to obtain a copy of the Disclosure Statement, the Plan, or related documents, you should contact Prime Clerk LLC (“**Prime Clerk**”), the balloting agent retained by the Debtors in these chapter 11 cases, by: (i) calling the Debtors’ restructuring hotline at 877-930-4318 (or 347-897-4054 for international calls); (ii) visiting the Debtors’ restructuring website at: <https://cases.primeclerk.com/GEE>; and/or (iii) sending an email to geeballots@primeclerk.com. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.deb.uscourts.gov> or free of charge at <https://cases.primeclerk.com/GEE>. Please be advised that Prime Clerk cannot provide legal advice.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the adequacy of the Disclosure Statement or the relief sought in connection therewith **must**: (i) be made in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware; (iii) state with particularity the legal and factual basis for the objection; and (iv) be filed with the Bankruptcy Court (contemporaneously with a proof of service), and be served upon the following parties (the “**Notice Parties**”) on or before **4:00 p.m. (Prevailing Eastern Time) on December 11, 2020** (the “**Objection Deadline**”):

1. Counsel to the Debtors: (i) Latham & Watkins LLP, 355 South Grand Avenue, Suite 100 Los Angeles, California 90071, Attn: Ted A. Dillman, Helena G. Tseregounis and Nicholas J. Messana (email: ted.dillman@lw.com, helena.tseregounis@lw.com and nicholas.messana@lw.com) and 885 Third Avenue, New York, New York 10022, Attn: Andrew C. Ambruoso and Jonathan J. Weichselbaum (email: andrew.ambruoso@lw.com and jon.weichselbaum@lw.com) and (ii) Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 King Street, Wilmington, Delaware 19801, Attn: Michael R. Nestor and Kara Hammond Coyle (email: mnestor@ycst.com and kcoyle@ycst.com);

2. U.S. Trustee: 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Timothy J. Fox, Jr. (email: timothy.j.fox@usdoj.gov);
3. Counsel to the First Lien Agent: (i) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: David N. Griffiths and Bryan R. Podzius (email: david.griffiths@weil.com and bryan.podzius@weil.com and (ii) Troutman Pepper Hamilton Sanders LLP, 1313 Market Street, Suite 5100, Wilmington, Delaware 19801, Attn: David M. Fournier (email: david.fournier@troutman.com);
4. Counsel to the Ad Hoc DIP and First Lien Lender Group: (i) Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, New York 10166, Attn: Scott J. Greenberg and Michael J. Cohen (email: sgreenberg@gibsondunn.com and mcohen@gibsondunn.com) and (ii) Pachulski, Stang, Ziehl & Jones LLP, 919 North Market Street # 1700, Wilmington, Delaware 19801, Attn: Laura Davis Jones (email: ljones@pszjlaw.com);
5. Counsel to the Creditors' Committee: (i) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, Bank of America Tower, New York, New York 10036, Attn: Philip C. Dublin and Jason P. Rubin (email: pdublin@akingump.com and jrubin@akingump.com) and (ii) Ashby & Geddes, P.A., 500 Delaware Avenue, 8th Floor, Wilmington, DE 19801, Attn: William P. Bowden and Michael D. DeBaecke (email: wbowden@ashbygeddes.com and mdebaecke@ashbygeddes.com).

PLEASE TAKE FURTHER NOTICE that only those objections made in writing and timely filed and received by the Objection Deadline will be considered by the Bankruptcy Court during the Disclosure Statement Hearing. If no objections are timely and properly filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the relief sought in the Disclosure Statement Motion without further notice.

[Remainder of page intentionally left blank.]

Dated: November 13, 2020
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Kara Hammond Coyle

Michael R. Nestor (No. 3526)
Kara Hammond Coyle (No. 4410)
Betsy L. Feldman (No. 6410)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mnestor@ycst.com
kcoyle@ycst.com
bfeldman@ycst.com

-and-

LATHAM & WATKINS LLP

George A. Davis (admitted *pro hac vice*)
Andrew C. Ambruoso (admitted *pro hac vice*)
Jonathan J. Weichselbaum (admitted *pro hac vice*)
885 Third Avenue
New York, New York 10022
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: george.davis@lw.com
andrew.ambruoso@lw.com
jon.weichselbaum@lw.com

-and-

Ted A. Dillman (admitted *pro hac vice*)
Helena G. Tseregounis (admitted *pro hac vice*)
Nicholas J. Messana (admitted *pro hac vice*)
355 South Grand Avenue, Suite 100
Los Angeles, California 90071
Telephone: (213) 485-1234
Facsimile: (213) 891-8763
Email: ted.dillman@lw.com
helena.tseregounis@lw.com
nicholas.messana@lw.com

Counsel for Debtors and Debtors in Possession