

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: SPIRIT AVIATION HOLDINGS,	:	Chapter 11
INC. <i>et al.</i> , ¹	:	
	:	Case No. 25-11897 (SHL)
Debtors.	:	Jointly Administered
	:	
	:	D.I. 1463, 1489
	:	
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**JOINDER OF THE IAM AND TWU LOCAL 570
TO THE LIMITED OBJECTION OF THE AFA
TO THE PROPOSED SALE OF DEIDENTIFIED DATA**

The International Association of Machinists and Aerospace Workers (the “IAM”) and the Transport Workers Union of America Local 570 (the “TWU Local 570”) respectfully submit this joinder to the *Limited Objection of the Association of Flight Attendants-CWA, AFL-CIO to the Proposed Sale of the Deidentified Data* [Docket No. 1489] (the “AFA Objection”) filed in response to the *Notice of Auction Results and Scheduled Hearing for the Deidentified Data* [Docket No. 1463] (the “Notice”) and state as follows:

1. The IAM is a labor union representing a bargaining unit of approximately 293 “below-the-wing” workers previously employed by the Debtors at Fort Lauderdale-Hollywood International Airport. TWU Local 570 is a labor union representing a bargaining unit of approximately 274 Guest Service Agents previously employed by the Debtors at Fort-Lauderdale-Hollywood International Airport.

¹ The Debtors’ names and last four digits of their respective employer identification numbers are as follows: Spirit Aviation Holdings, Inc. (1797); Spirit Airlines, LLC (7023); Spirit Finance Cayman 1 Ltd. (7020); Spirit Finance Cayman 2 Ltd. (7362); Spirit IP Cayman Ltd. (4732); and Spirit Loyalty Cayman Ltd. (4752). The Debtors’ mailing address is 1731 Radiant Drive, Dania Beach, FL 33004.

2. The IAM and TWU Local 570 share the AFA's concerns regarding the Debtors' proposed sale of their deidentified corporate data, including vast tranches of employment, pay, discipline, and email files related to the Debtors' employees formerly represented by the IAM and TWU Local 570, to Google LLC. The proposed sale raises novel technological and legal concerns on very short notice, and the IAM and TWU Local 570 urge the Court and the Debtors to give the unions' concerns due and careful consideration.

3. First, the AFA correctly notes that the consumer-oriented privacy provisions of both the Bankruptcy Code and the Debtors' proposed sale order do not address the separate confidentiality concerns of the Debtors' former employees, whose data the Debtors are offering for sale alongside the data of their customers.

4. Second, the IAM and TWU Local 570 note that past practices and jurisprudence regarding confidentiality and deidentification protections for the sale of a corporate debtor's corpus of data may need reconsideration in light of the advent of artificial intelligence. Data deidentification was never a guarantee that a scrupulous reader expending enough time and energy could not piece together meaningful connections, and in many cases identifications, between purportedly anonymized records. But a human reader would have to expend enormous amounts of time and energy to reconnect a deidentified data set as large as the Debtors propose to sell in this case, so the benefit of deidentification was to make the juice not worth the squeeze. That traditional logic no longer applies in an age where artificial intelligence can reassemble the connections deidentification is meant to obscure in an infinitesimally small fraction of the time, and at an infinitesimally small fraction of the cost.

5. Neither the IAM, TWU Local 570, nor likely the Debtors and the potential purchasers know the ultimate uses to which the Debtors' data may be put after it is sold and

processed through artificial intelligence. The IAM and TWU Local 570 urge this Court to approach the Debtors' proposed sale with the utmost caution.

6. For the foregoing reasons, the IAM and TWU Local 570 join in the limited objection of the AFA to the proposed sale of the Debtors' deidentified data.

Dated: New York, New York
August 28, 2026

Respectfully submitted,

/s/ Richard M. Seltzer

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CERTIFICATE OF SERVICE

I certify that on the 28th day of August 2026, I caused a true and correct copy of the *Joinder of the IAM and TWU Local 570 to the Limited Objection of the AFA to the Proposed Sale of Deidentified Data* to be served through the Court's electronic notification system.

/s/ Matthew E. Stolz
Matthew E. Stolz