

EXHIBIT B

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

JERRY CADIGAN, and NANCY CATON
CADIGAN, as the Proposed Administrators of
the Estate of TREVOR NORRIS CADIGAN,
deceased,

Plaintiffs,

-against-

LIBERTY HELICOPTERS, INC., a New York
Corporation; NYONAIR, LLC, a New Jersey
Limited Liability Company; MERIDIAN
CONSULTING I CORPORATION, INC., a
Delaware Corporation; RICHARD ZEMKE
VANCE, a Connecticut resident; AIRBUS
HELICOPTERS, S.A.S., a French Corporation;
AIRBUS HELICOPTERS, INC.; a Delaware
Corporation; and APICAL INDUSTRIES, INC.
d/b/a DART AEROSPACE, a California
Corporation;

Defendants.

INDEX NO.: 152286/2018

**DEFENDANTS, LIBERTY
HELICOPTERS, INC.,
RICHARD ZEMKE VANCE
AND MERIDIAN CONSULTING
I CORPORATION, INC.'S
DEMAND FOR DISCOVERY
AND INSPECTION ON CO-
DEFENDANT APICAL
INDUSTRIES, INC. PURSUANT
TO CPLR 3120**

PLEASE TAKE NOTICE that Defendants, **LIBERTY HELICOPTERS, INC.,
RICHARD ZEMKE VANCE AND MERIDIAN CONSULTING I CORPORATION, INC.**
(collectively, the “Liberty Defendants” unless necessary to distinguish), by their attorneys, Lewis
Brisbois Bisgaard & Smith LLP, hereby demand that co-defendant **APICAL INDUSTRIES,
INC. d/b/a DART AEROSPACE** (“Dart”), in accordance with Civil Practice Laws and Rules
(“CPLR”) Rule 3120 and all pertinent local Court rules, provide to the undersigned within
twenty (20) days:

1. Copies of any documents, including invoices, estimates, receipts, bills of sale,
proposals or account statements pertaining to the sale of a Dart Emergency Float Kit model

number 20326-700 installed on the helicopter registered N350LH, msn 7654 (the "Accident Helicopter").

2. Copies of any documents, including invoices, estimates, receipts, bills of sale, proposals or account statements pertaining to the sale of a Dart Emergency Float Kit model number 20326-700 to any of the Liberty Defendants, individually or collectively, at any time.

3. Copies of any and all correspondence or communications, at any time, in any form, between Dart and any entity, including, but not limited to, EuroTec Canada, Ltd., regarding the sale of the Dart Emergency Float Kit model number 20326-700 installed on the Accident Helicopter.

4. Copies of any documents, including invoices, estimates, receipts, bills of sale, proposals or account statements pertaining to the sale of any Dart product to any of the Liberty Defendants, individually or collectively, at any time.

5. Copies of any and all correspondence or communications, at any time, in any form, between Dart and any representatives, employee or agent of the Liberty Defendants, individually or collectively.

6. Copies of any and all correspondence or communications, at any time, in any form, between Dart and any representatives, employee or agent of the EuroTec Canada, Ltd., regarding the installation of the Dart Emergency Float Kit model number 20326-700 installed on the Accident Helicopter.

7. Copies of any and all documents in possession of Dart regarding any deviation(s) by EuroTec Canada, Ltd., in reference to the Installation Instructions for the Dart Emergency Float Kit model number 20326-700 installed on the Accident Helicopter.

8. Copies of any and all documents in possession of Dart which reference the Accident Helicopter.

PLEASE TAKE NOTICE that these are continuing demands and if any of these items are later known or obtained, they are to be furnished pursuant to these demands.

PLEASE TAKE FURTHER NOTICE, that the within is a continuing request. In the event any of the above items are obtained after service hereof, they are to be immediately furnished to this office.

PLEASE TAKE FURTHER NOTICE, that upon failure to timely produce, identify, state and provide the aforesaid items, a motion will be made for the appropriate relief to this Court

PLEASE TAKE FURTHER NOTICE, that any documents or materials redacted or withheld on the basis of any recognized privilege shall be timely identified on a privilege log pursuant to CPLR 3122(b).

Dated: July 16, 2018
New York, New York

Yours, etc.

LEWIS BRISBOIS BISGAARD & SMITH, LLP
77 Water Street, 21st Floor
New York, New York 10005
973-577-6260
*Attorneys for Defendants Liberty Helicopters, Inc.,
Meridian Consulting I Corporation, Inc., and Richard
Zemke Vance*

By: /s/ Gene K. Kaskiw
GENE K. KASKIW
PETER B. VAN DEVENTER, JR. (*pro hac vice to be filed*)
DOUGLAS H. AMSTER (*pro hac vice to be filed*)

**PLEASE DIRECT ALL
CORRESPONDENCE TO:** LEWIS BRISBOIS BISGAARD & SMITH, LLP

1037 Raymond Boulevard, Suite 800
Newark, New Jersey 07102
973-577-6260 (telephone)
973-577-6261 (facsimile)

CC: All counsel of record (*via NYSCEF*)

AFFIRMATION OF SERVICE

STATE OF NEW YORK)
) ss.:
 COUNTY OF NEW YORK)

GENE K. KASKIW, an attorney-at-law licensed to practice in the State of New York, employed by the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP deposes and says: deponent is not a party to this action, is over 18 years of age with business address in New York County. That on the 10TH day of July, 2018, deponent served the within document(s) upon:

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Counsel to Defendant NY ON AIR, LLC d/b/a FLYNYON

at the address(es) designated by said attorney(s) for that purpose by filing same with the New York Supreme Court Electronic Filing System (NYSCEF).

DATED: July 17, 2018

/s/ Gene K. Kaskiw