

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

In re:

ADAM AIRCRAFT INDUSTRIES, INC.,

Debtor.

Case No. 08-11751(MER)
Chapter 7

**RESPONSE AND RESERVATION OF RIGHTS OF HARTZELL PROPELLER INC.
WITH RESPECT TO TRUSTEE'S MOTION TO ESTABLISH PROCEDURES
FOR THE DETERMINATION OF CURE AMOUNTS AND FOR APPROVAL OF
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS AND
UNEXPIRED LEASES PURSUANT TO AN AUCTION SALE**

Hartzell Propeller Inc. ("Hartzell Propeller") by and through its attorneys, Calfee, Halter & Griswold LLP, hereby reserves its rights to be heard at subsequent hearings in connection with the Trustee's Motion to Establish Procedures for the Determination of Cure Amounts and for the Approval of Assumption and Assignment of Executory Contracts and Unexpired Leases Pursuant to Auction Sale (the "Cure Procedures Motion").

RESERVATION OF RIGHTS

The Cure Procedures Motion does not provide a list of executory contracts or unexpired leases that are the subject of the relief sought in the Motion. See Cure Procedures Motion ¶ 11. Therefore, Hartzell Propeller is unable to determine if its rights and interests will be impaired or compromised upon the entry of an order granting the Cure Procedures Motion.

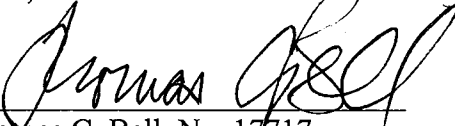
Out of an abundance of caution, Hartzell Propeller reserves all of its rights to be heard at any subsequent hearing on the Cure Procedures Motion, in the event the Cure Procedures Motion (or orders entered related thereto) affect Hartzell Propeller's interests in any way.

Also, paragraphs 11 and 12 of the Cure Procedures Motion seem to be internally inconsistent. The Trustee asserts in one instance that he does not know which executory contracts and unexpired leases will be affected by the sale. See Cure Procedures Motion ¶ 11. Then, in the other instance, he contends that he will provide the affected parties with cure notices. See Cure Procedures Motion ¶ 12. This Cure Procedures Notice does not provide non-debtor parties, like Hartzell Propeller, with notice that their interests may be impaired or comprised by the relief requested therein. The Trustee should comply with all noticing requirements to afford all parties an opportunity to be heard regarding the relief requested.

WHEREFORE, Hartzell Propeller filed this response and reservation of its rights to the Cure Procedures Motion, it respectfully requests that the Court direct the Trustee to file all cure notices (as described in the Cure Procedures Motion) with a list of affected executory contracts and unexpired leases with the Court to ensure that all affected non-debtor parties have notice of the same, and that Hartzell Propeller be granted such other and further relief as the Court may deem just and proper.

Dated: March 6, 2008

DAVIS, GRAHAM & STUBBS-LLP

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Counsel for Hartzell Propeller Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of March, 2008, a true and correct copy of the foregoing **RESPONSE AND RESERVATION OF RIGHTS OF HARTZELL PROPELLER INC. WITH RESPECT TO TRUSTEE'S MOTION TO ESTABLISH PROCEDURES FOR THE DETERMINATION OF CURE AMOUNTS AND FOR APPROVAL OF ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES PURSUANT TO AN AUCTION SALE** was served by placing same in the United States mail, postage prepaid, addressed to the following:

J. C. Smiley, Esq.
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600 17th Street, Suite 1800-S
Denver, CO 80202


s/ Bernadette Marquez
Bernadette Marquez