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August 28, 2015

VIA EMAIL

The Secretary
Canadian Transportation Agency
Ottawa, ON K1A 0N9

Dear Madam Secretary:

**Re: Dr. Gábor Lukács v. SkyGreece Airlines
Emergency application for an Order to reprotect and protect stranded passengers
Request for expedited process**

Please accept the following request for expedited process.

I. RELIEF SOUGHT

The Applicant hereby requests, pursuant to Rule 28(1) of the *Canadian Transportation Agency Rules (Dispute Proceedings and Certain Rules Applicable to All Proceedings)*, S.O.R./2014-10 (*“Dispute Rules”*), that an expedited process be applied to all steps in the present proceeding, including but not limited to, the answer under Rule 19.

II. SUMMARY OF THE FACTS

On the week of August 17, 2015, SkyGreece Airlines left hundreds of passengers stranded for several days by cancelling its flights and failing to offer passengers transportation on flights of other airlines.

On August 27, 2015 (yesterday), SkyGreece Airlines announced that it would “temporarily cease all operations,” leaving several hundred passengers stranded indefinitely, and in blatant disregard of its obligations under its International Tariff Rule 85.

The present request is filed concurrently with an emergency Application seeking an Order directing SkyGreece Airlines to arrange for alternative transportation for all its stranded passengers (as required by its tariff) and to provide security for the anticipated claims of passengers. SkyGreece Airlines' main, and possibly only, asset is its sole aircraft, which is currently parked at the Toronto International Airport.

III. ARGUMENTS IN SUPPORT OF THE REQUEST

1. *Complexity of the matter.* Neither the Application nor the applicable law or the remedies sought are complex.
2. *The reasons for the request.* The Application seeks systemic remedies to two concerns:
 - (a) stranded passengers will suffer further losses if SkyGreece Airlines is permitted to continue to ignore its obligation to reprotect stranded passengers on other airlines; and
 - (b) SkyGreece Airlines may preempt any attempt of the travelling public to enforce its rights pursuant to the *Montreal Convention*, s. 113.1(b) of the *ATR*, and the contract of carriage by disposing of its assets.

If these issues are not addressed promptly, then the travelling public will suffer irreparable harm, because any remedy may become moot (due to stranded passengers incurring the losses the Application seeks to prevent) and/or unenforceable (due to SkyGreece Airlines disposing of its assets). These issues are of the “justice delayed is justice denied” nature.

3. *Prejudice to SkyGreece Airlines.* The Applicant is not aware of any prejudice to SkyGreece Airlines if the request is granted.

IV. DOCUMENTS RELIED ON

The Applicant relies on all documents and facts submitted in support of the Application, dated August 28, 2015.

All of which is most respectfully submitted.

Dr. Gábor Lukács
Applicant

Cc: Mr. Richard Look, s. 84 agent for SkyGreece Airlines