

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL BUSINESS AVIATION  
ASSOCIATION, INC.,  
SANTA MONICA AIRPORT  
ASSOCIATION, INC.,  
BILL'S AIR CENTER, INC.,  
KIM DAVIDSON AVIATION, INC.,  
REDGATE PARTNERS, LLC, AND  
WONDERFUL CITRUS LLC,

Petitioners,

v.

MICHAEL P. HUERTA, Administrator,  
FEDERAL AVIATION ADMINISTRATION,

Respondent.

**Petition for Review**

PETITION FOR REVIEW

National Business Aviation Association, Inc.; Santa Monica Airport Association, Inc.; Bill's Air Center, Inc.; Kim Davidson Aviation, Inc.; Redgate Partners, LLC; and Wonderful Citrus LLC hereby petition this Honorable Court for review of a final order of the Federal Aviation Administration (FAA) pursuant to 49 U.S.C. § 46110, embodied in a settlement agreement entered into between the FAA and the City of Santa Monica, California (City) on January 30, 2017. Pursuant to the settlement agreement, the FAA purports to release – contrary to statute, regulation, and policy – obligations incurred by the City of Santa Monica

pursuant to deeds and grants issued by the federal government, and further to modify – contrary to statute, regulation, and policy – the terms and conditions governing the City’s future operation of and the FAA’s future oversight of Santa Monica Municipal Airport (SMO).

Respectfully submitted,

ZUCKERT, SCOUTT & RASENBERGER, LLP



Dated: February 13, 2016

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Counsel for Petitioners

### Rule 15(c) Statement

To the extent the City of Santa Monica, California may be deemed to be a party admitted to participate in the underlying proceeding, a copy of this petition has been served pursuant to Rule 15(c) upon:

Joseph Lawrence, Esq.  
Interim City Attorney  
City of Santa Monica  
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