

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

**GRUPO AEROMÉXICO, S.A.B. de C.V., et  
al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**AFFIDAVIT AND DISCLOSURE STATEMENT OF Mauricio Ibañez,**

**ON BEHALF OF IHMA Abogados y Consultores S.C.**

STATE OF Mexico City)  
COUNTY OF Miguel s.s.:  
Hidalgo)

Mauricio Ibañez, being duly sworn, upon his oath, deposes and says as follows:

1. I am Mexican partner of IHMA Abogados y Consultores S.C., located at Bosque de Ciruelos 130-501 in Mexico City (the "Firm").

2. Grupo Aeroméxico, S.A.B. de C.V. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), have requested that the Firm provide legal advisory and litigation services to the Debtors, and the Firm has consented to provide such services (the "**Services**").

<sup>1</sup> The Debtors in these cases, along with each Debtor's registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors' corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.



3. The Services include, but are not limited to, the following: render labor litigation services and all kind of advise in labor matters, whether of an individual or collective nature and corporate or other matters ancillary to the labor matter or disputes

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

7. As of the commencement of this chapter 11 case, the Debtors owed the Firm \$Mex Ps. 211,120.00 in respect of prepetition services rendered to the Debtors.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.



*[Remainder of Page Intentionally Left Blank]*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on March 26, 2021, 2020, at Mexico City.

Mauricio Ibañez

Affiant Name

SWORN TO AND SUBSCRIBED before  
Me this \_\_\_\_\_ day of \_\_\_\_\_, 2020

\_\_\_\_\_  
Notary Public

Yo, CARLOS DE PABLO SERNA, Notario No. 137 de la Ciudad de México, HAGO CONSTAR: que por instrumento ante mí, No. 128,396, de 26 de marzo de 2021, don MAURICIO IBÁÑEZ CAMPOS, ratificó el texto del presente documento, que declaró conocer en todos sus términos y en lo que éste consiste y su firma que lo calza por haber sido puesta por él de su puño y letra.- Doy fe. – Ciudad de México, a 26 de marzo de 2021.





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**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Grupo Aeroméxico, S.A.B. de C.V. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors").

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

IHMA Abogados y Consultores S.C. Bosque de Ciruelos 130 – 501, Bosques de las Lomas. Miguel Hidalgo, Z.C. 11700, Mexico City

2. Date of retention: November 2012

3. Type of services to be provided:

Labor litigation and legal advise on labor matters

4. Brief description of services to be provided:

Labor litigation and all kind of legal advise in labor matters and other ancillary services, including corporate, as these relate to labor matters entrusted to the Firm

<sup>1</sup> The Debtors in these cases, along with each Debtor's registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors' corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.



5. Arrangements for compensation (hourly, contingent, etc.):

Monthly Fixed Fee

- (a) Average hourly rate (if applicable): \_\_\_\_\_
- (b) Estimated average monthly compensation based on prepetition retention (if company was employed prepetition): Mex Ps \$16,240.00

6. Prepetition claims against the Debtors held by the company:

Amount of claim: \$ Mex Ps. 211,120.00

Date claim arose: As of March 2020

Nature of claim: Legal Services rendered

7. Prepetition claims against the Debtors held individually by any member, associate, or employee of the company:

Name: N/A

Status: \_\_\_\_\_

Amount of claim: \$ \_\_\_\_\_

Date claim arose: \_\_\_\_\_

Nature of claim: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

None

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9. Name and title of individual completing this form:

Mauricio Ibañez, Managing partner

Dated: March 26, 2021