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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

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

Debtors.1

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING APPLICATIONS FOR ALLOWANCE OF FINAL AND INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the "Local Rules"), and in accordance with this Court's case management procedures set forth in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on July 8, 2020 [ECF No. 79] (the "Case Management Order"), the undersigned hereby certifies as follows:

1. Responses to the Second Interim and Final Application of Cervantes Sainz, S.C. for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period

¹ 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.

from June 30, 2020 Through October 31, 2020 [D.I. 1009] (the "Final Cervantes Sainz Application"), filed January 28, 2021, were due no later than March 10, 2021, at 4:00 p.m. (prevailing Eastern Time) (the "Final Application Objection Deadline").

- 2. Responses to the *First Interim Application of Sainz Abogados, S.C. for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2020 Through December 31, 2020* [D.I. 1032] (the "**Interim Sainz Abogados Application**", and together with the Final Cervantes Sainz Application, the "**Applications**"), filed March 29, 2021, were due no later than April 14, 2021, at 4:00 p.m. (prevailing Eastern Time) (the "**Interim Application Objection Deadline**").
- 3. The Case Management Order and Local Rule 9075-2 provide that pleadings may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the attorney for the entity that filed the motion complies with the relevant procedural and notice requirements.
- 4. The Debtors respectfully request that the Court grant the Applications and enter the proposed order, a copy of which is attached hereto as **Exhibit A** (the "**Proposed Order**"). The Proposed Order contains certain reductions in the amounts for which allowance is being sought, which have been agreed to by the Office of the United States Trustee and the applicable professional.

Dated: April 28, 2021

New York, New York

DAVIS POLK & WARDWELL LLP

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