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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.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 20-11563 (SCC)
)
) (Jointly Administered)
)

**SUPPLEMENTAL DECLARATION OF JUAN MANUEL DELGADO IN SUPPORT
OF THE APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF MORRISON & FOERSTER LLP AS
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

I, Juan Manuel Delgado, being duly sworn, state the following under penalty of perjury:

1. I am a partner in the law firm of Morrison & Foerster LLP (“Morrison & Foerster”), with offices at 600 Brickell Avenue, Suite 1560, Miami, Florida, 33131, among other locations, and I am duly authorized to make this declaration (this “Supplemental Declaration”) on behalf of

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; and 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.

Morrison & Foerster, which serves as counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Grupo Aeroméxico, S.A.B. de C.V. and its above-captioned affiliates, as debtors and debtors-in-possession (collectively, the “Debtors”). I am an attorney duly admitted and in good standing to practice before the Bars of the State of New York, the State of Florida, and the District of Columbia. There are no disciplinary proceedings pending against me.

2. On August 5, 2020, the Committee filed the *Application for Entry of an Order Authorizing the Retention and Employment of Morrison & Foerster LLP as Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to July 15, 2020* [Docket No. 241] (as amended and supplemented, from time to time, the “Application”). On September 25, 2020, the Court entered the *Order Authorizing the Retention and Employment of Morrison & Foerster LLP as Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to July 15, 2020* [Docket No. 473]. On June 21, 2021, Morrison & Foerster filed the *Declaration of Juan Manuel Delgado in Support of the Application for Entry of an Order Authorizing the Retention and Employment of Morrison & Foerster LLP as Counsel for the Official Committee of Unsecured Creditors* [Docket No. 1331] (the “Delgado Declaration”) in support of the Application.

3. I submit this Supplemental Declaration in accordance with rules 2014(a) and 2016(a) of the Federal Rules of Bankruptcy Procedure to amend and restate certain statements made in the Delgado Declaration. Except as otherwise indicated, the facts set forth in this Supplemental Declaration are personally known to me and, if called as a witness, I could and would testify thereto.

4. Paragraph 4(d) of the Delgado Declaration is hereby amended and restated as follows: “Performing other services that may reasonably be requested by the Committee from

time to time, limited to U.S. law implications of Mexican law issues and Spanish language documents.”

5. Morrison & Foerster may also act as conflicts counsel to the Committee (if necessary) on matters where Willkie Farr & Gallagher LLP is conflicted and Morrison & Foerster is not.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: June 25, 2021
Miami, Florida

/s/ Juan Manuel Delgado
Juan Manuel Delgado