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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)

NOTICE OF INTERIM FEE APPLICATIONS HEARING

PLEASE TAKE NOTICE that a hearing (the “**Hearing**”) with respect to the applications for allowance of interim compensation and reimbursement of expenses for the interim compensation period of January 1, 2021 through and including April 30, 2021 (the “**Interim Fee Applications**”), filed by certain professionals retained in the above-captioned chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), will be held on **September 20, 2021 at 1:00 p.m.** (prevailing Eastern Time) before the Honorable Judge Shelley C. Chapman, United

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.

States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), or at such other time as the Bankruptcy Court may determine.

PLEASE TAKE FURTHER NOTICE that, in accordance with General Order M-543, dated March 20, 2020 (Morris, C.J.) (“**General Order M-543**”),² the Hearing will be conducted telephonically. Any parties wishing to participate must do so telephonically by making arrangements through CourtSolutions, LLC (www.court-solutions.com). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.

The Interim Fee Applications and the amounts requested therein are set forth as follows:

APPLICANT	NATURE OF REPRESENTATION	FEES REQUESTED TO BE ALLOWED	EXPENSED REQUESTED TO BE ALLOWED
<u>Debtors’ Professionals</u>			
Morris, Nichols, Arsht & Tunnell LLP [ECF No. 1311]	Special Counsel	\$179,109.00	\$551.22
Skyworks Capital, LLC [ECF No. 1313]	Financial Advisor	\$4,668,910.00	\$45,218.00
White & Case LLP [ECF No. 1327]	Special Counsel	\$4,005,302.00	\$1,682.91
Sainz Abogados, S.C. [ECF No. 1328]	Special Mexican Counsel	\$793,002.68	\$0.00

² A copy of the General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/general-order-m-543-court-operations-under-exigent-circumstances-created-covid-19>.

APPLICANT	NATURE OF REPRESENTATION	FEES REQUESTED TO BE ALLOWED	EXPENSED REQUESTED TO BE ALLOWED
Rothschild & Co US Inc. and Rothschild & Co Mexico S.A. de C.V. [ECF No. 1329]	Investment Banker	\$16,625,000.00	\$19,551.11
AlixPartners, LLP and AlixPartners International, Inc. [ECF No. 1339]	Financial Advisor	\$13,748,314.00	\$0.00
Davis Polk & Wardwell LLP [ECF No. 1346]	Debtors' Counsel	\$5,558,249.50	\$56,114.48
Lee Group PLLC [ECF No. 1448] ³	Special Airline Transaction Counsel	\$143,950.00	\$0.00
<u>Official Committee of Unsecured Creditors' Professionals</u>			
FTI Consulting, Inc. [ECF No. 1349]	Financial Advisor	\$1,500,000.00	\$0.00
Morrison & Foerster LLP [ECF No. 1420]	Special Counsel	\$2,853,703.50	\$13,499.79
Santamarina y Steta, S.C. [ECF No. 1514]	Mexican Counsel	\$292,890.04	\$539.81

PLEASE TAKE FURTHER NOTICE that copies of the Interim Fee Applications may be obtained free of charge by visiting the website of Epiq Corporate Restructuring, LLC at <https://dm.epiq11.com/aeromexico>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court's website at

³ The First Interim Application of the Lee Group PLLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Airline Transaction Counsel to the Debtors and Debtors In Possession [Docket No. 1448] is for the period April 15, 2021 through May 31, 2021.

<http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or a later hearing. The Debtors will file an agenda before the Hearing, which may modify or supplement Interim Fee Applications to be heard at the Hearing.⁴

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Interim Fee Applications shall be in writing, shall comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with General Order M-399 and the *Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on July 8, 2020 [ECF No. 79], so as to be filed and received no later than **September 13, 2021 at 4:00 p.m.** (Prevailing Eastern Time) (the “**Objection Deadline**”).

⁴ On July 21, 2021, the Court entered the *Order Authorizing the Employment and Retention of De la Vega & Martinez Rojas, S.C. as Special Labor Counsel to the Debtors Nunc Pro Tunc to April 30, 2021* [ECF No. 1457]. The Debtors expect to file the first interim fee application for De la Vega & Martinez Rojas, S.C., for the period from April 30, 2021 through and including May 31, 2021, no later than 21 days prior to the Hearing.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to telephonically attend the Hearing, and failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that, if no objections are timely filed and served with respect to the Interim Fee Applications, the Debtors and the Official Committee of Unsecured Creditors' Counsel may, on or after the Objection Deadline submit to the Bankruptcy Court proposed orders granting the Interim Fee Applications, which orders the Bankruptcy Court may enter with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates in open court at the Hearing.

Dated: August 6, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

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