

**THIS OBJECTION SEEKS TO DISALLOW, EXPUNGE, MODIFY, REDUCE, AND/OR RECLASSIFY CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' EIGHTEENTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR THE EXHIBITS AND SCHEDULES ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT GRUPO AEROMÉXICO'S COUNSEL, DAVIS POLK & WARDWELL LLP, AT aeromexicoclaims@dpw.com, RICHARD J. STEINBERG (richard.steinberg@davispolk.com or +1-646-460-1954), OR MOSHE MELCER (+1-732-606-3155).**

**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)**

**NOTICE OF HEARING ON DEBTORS' EIGHTEENTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM (WRONG DEBTOR, INCORRECTLY CLASSIFIED, FOREIGN CURRENCY, AMENDED AND DUPLICATE, AND/OR REDUCED CLAIMS)**

**PLEASE TAKE NOTICE** that, on August 18, 2021, Grupo Aeroméxico, S.A.B. de C.V. (“**Grupo Aeroméxico**”) and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed their *Eighteenth Omnibus Claims Objection to Proofs of Claim (Wrong Debtor, Incorrectly Classified, Foreign Currency, Amended and Duplicate, and/or Reduced Claims)* (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

<sup>1</sup> The Debtors in these cases, along with the last four digits of 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.

The Objection is annexed hereto as **Exhibit A**. The Objection requests that the Bankruptcy Court disallow, expunge, modify, reduce, and/or reclassify one or more of your Claims<sup>2</sup> listed on the schedules (collectively, the “**Schedules**”) attached to **Exhibit 1** of the Objection on the grounds that such Claims:

- (i) have been filed against the wrong Debtor (“**Wrong Debtor Claims**”);
- (ii) in part or in full, are not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”);
- (iii) were asserted in a currency other than United States dollars or Mexican pesos (“**Foreign Currency Claims**”)
- (iv) have been amended or superseded by other Claims and/or are duplicative of other Claims (“**Amended and Duplicate Claims**”); and/or
- (v) seek to recover amounts in excess of the accurate Claim amount (“**Reduced Claims**”).

Any Claim that the Bankruptcy Court expunges and disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof. Any Claim that the Bankruptcy Court modifies, reduces, and/or reclassifies will remain on the Claims Register as modified, reduced, and/or reclassified.

**PLEASE TAKE FURTHER NOTICE** that the *Court-Ordered Omnibus Claims Hearing Procedures* [ECF No. 904] (the “**Omnibus Claims Hearing Procedures**”), annexed hereto as **Exhibit B**, apply and govern the Objection to your Proof(s) of Claim. The Omnibus Claims Hearing Procedures provide for certain mandatory actions by a claimant within certain time periods. Therefore, please review the Omnibus Claims Hearing Procedures carefully. Failure to comply with the Omnibus Claims Hearing Procedures may result in the disallowance, expungement,

---

<sup>2</sup> Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

modification, reduction and/or reclassification of a Proof of Claim without further notice to a claimant.

If you do NOT oppose the disallowance, expungement, modification, and/or reclassification of your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection, then you do NOT need to file a written response to the Objection and you do NOT need to appear at the Hearing (as defined below).

If you DO oppose the disallowance, expungement, modification, reduction and/or reclassification of your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection, then you MUST file with the Bankruptcy Court and serve on the parties listed below a written response to the Objection (a “**Response**”) so that it is received on or before **Friday, September 17, 2021 at 4:00 p.m. (prevailing Eastern Time)** (the “**Response Deadline**”).

Your Response, if any, must contain at a minimum the following: (i) a caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number, and title of the Objection to which the response is directed; (ii) the name of the claimant and description of the basis for the amount of the Claim; (iii) a concise statement setting forth the reasons why the Claim should not be disallowed, expunged, modified, reduced and/or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which you will rely in opposing the Objection; (iv) all documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which you will rely in opposing the Objection; (v) the address(es) to which the Debtors must return any reply to your Response, if different from that presented in the Proof of Claim; and (vi) the name, address, and telephone number of the person (which may be you or your legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on your behalf.

The Bankruptcy Court will consider a Response only if the Response is timely filed, served, and received. A Response will be deemed timely filed, served, and received only if prior to the Response Deadline, the Response is (a) filed electronically with the Bankruptcy Court on the docket of *In re Grupo Aeroméxico, S.A.B. de C.V., et al.*, Case No. 20-11563 (SCC), in accordance with the Bankruptcy Court's General Order M-399 (available on the Bankruptcy Court's website at <http://www.nysb.uscourts.gov>), by registered users of the Bankruptcy Court's electronic case filing ("ECF") system, (b) sent to the chambers of the Honorable Judge Shelley C. Chapman, United States Bankruptcy Court, One Bowling Green, New York, New York 10004; and (c) served (via email or otherwise) so as to be actually received on or before the Response Deadline upon (i) Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017 (Attn: Timothy Graulich (timothy.graulich@davispolk.com), Stephen D. Piraino (stephen.piraino@davispolk.com), Erik P. Jerrard (erik.jerrard@davispolk.com), and Richard J. Steinberg (richard.steinberg@davispolk.com)), counsel to the Debtors and (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Brett H. Miller (bmiller@willkie.com), Todd M. Goren (tgoren@willkie.com), Craig Damast (cdamast@willkie.com), and Debra M. Sinclair (dsinclair@willkie.com)), counsel to the Official Committee of Unsecured Creditors appointed in these cases.

Except as otherwise permitted under the Omnibus Claims Hearing Procedures, a hearing (the "**Hearing**") will be held on **Monday, September 20, 2021 at 1:00 p.m. (prevailing Eastern Time)**, to consider the Objection. The Hearing will be held in the United States Bankruptcy Court for the Southern District of New York. If you file a written Response to the Objection, you should plan to appear at the Hearing. The Debtors, however, reserve the right to continue the Hearing on the Objection with respect to your Claim(s). If the Debtors do continue the Hearing with respect to your

Claim(s), then the Hearing will be held at a later date. If the Debtors do not continue the Hearing with respect to your Claim(s), then the Hearing on the Objection will be conducted on the above date.

The Debtors have the right to object to your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection (or to any other Claims you may have filed) at a later date on grounds not asserted in the Objection unless the Bankruptcy Court disallows and expunges your Claim(s). You will receive a separate notice of any such objections.

Responding parties shall attend the Hearing telephonically so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court. You may participate in the Hearing telephonically by making arrangements through CourtSolutions, LLC ([www.court-solutions.com](http://www.court-solutions.com)). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.<sup>3</sup>

If you wish to view the complete Objection, you can do so for free at <https://dm.epiq11.com/aeromexico>. **CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE BANKRUPTCY COURT TO DISCUSS THE MERITS OF THEIR CLAIMS.**

*[Remainder of Page Intentionally Left Blank]*

---

<sup>3</sup> A copy of General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/court-operations-under-exigent-circumstances-created-covid-19>.

Dated: August 18, 2021  
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*

**Exhibit A**

**Objection**

DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*

**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)**

**DEBTORS' EIGHTEENTH OMNIBUS CLAIMS OBJECTION  
TO PROOFS OF CLAIM (WRONG DEBTOR, INCORRECTLY CLASSIFIED,  
FOREIGN CURRENCY, AMENDED AND DUPLICATE, AND/OR REDUCED CLAIMS)**

\* \* \*

**TO THE CLAIMANTS LISTED ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER (ATTACHED HERETO AS EXHIBIT 1): YOUR RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION(S) THAT MAY BE FILED BY THE DEBTORS. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS' RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS LISTED ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER.**

\* \* \*

<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; 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.



Grupo Aeroméxico S.A.B. de C.V. (“**Grupo Aeroméxico**”) and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**”) hereby file this *Eighteenth Omnibus Claims Objection to Proofs of Claim (Wrong Debtor, Incorrectly Classified, Foreign Currency, Amended and Duplicate, and/or Reduced Claims)* (the “**Objection**”), pursuant to the *Order Approving (I) Omnibus Claims Objection Procedures, (II) Omnibus Claims Settlement Procedures and (III) Omnibus Claims Hearing Procedures* [ECF No. 904] (the “**Claims Objections Procedures Order**”). This Objection is supported by the *Declaration of Ricardo Javier Sánchez Baker in Support of the Eighteenth Omnibus Claims Objection to Proofs of Claim (Wrong Debtor, Incorrectly Classified, Foreign Currency, Misclassified Unliquidated, Amended and Duplicate, and/or Reduced Claims)* (the “**Sánchez Declaration**”), attached hereto as **Exhibit 2** and incorporated herein by reference. In further support of the Objection, the Debtors respectfully state as follows:

### **Relief Requested**

1. By this Objection, and pursuant to sections 105 and 502 of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and the Claims Objections Procedures Order, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit 1** (the “**Proposed Order**” and, if entered, the “**Order**”), disallowing, expunging, modifying, reducing, and/or reclassifying each of the claims identified on the schedules attached to the Proposed Order (collectively, the “**Schedules**”), as set forth therein.<sup>2</sup>

---

<sup>2</sup> The Schedules are incorporated herein by reference.

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Southern District of New York (the “**Court**”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and, pursuant to Bankruptcy Rule 7008, the Debtors consent to entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

3. The legal predicates for the relief requested herein are sections 105 and 502 of the Bankruptcy Code, and Bankruptcy Rule 3007.

4. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Background**

#### **A. General Background**

5. On June 30, 2020 (the “**Petition Date**”), the Debtors each commenced in this Court a voluntary case (the “**Chapter 11 Cases**”) under chapter 11 of title 11 of the United States Code. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

6. The Debtors’ Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

7. On July 13, 2020, the United States Trustee formed an Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) in the Chapter 11 Cases. No trustee or examiner has been appointed in the Chapter 11 Cases.

8. The Court entered a (i) *Final Order Authorizing (I) Debtors to Honor Prepetition Obligations to Customers and Related Third Parties and to Otherwise Continue Customer Programs, (II) Relief from Stay to Permit Setoff in Connection with the Customer Programs and (III) Financial Institutions to Honor and Process Related Checks and Transfers* [ECF No. 205] (the “**Customer Programs Order**”); (ii) *Final Order Authorizing (I) Debtors to Pay Certain Prepetition Taxes, Governmental Assessments and Fees and (II) Financial Institutions to Honor and Process Related Checks and Transfers* on July 29, 2020 [ECF No. 206] (the “**Taxes Order**”); (iii) *Final Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed With Outstanding Workers’ Compensation Claims And (III) Financial Institutions to Honor and Process Related Checks and Transfers* on July 30, 2020 [ECF No. 216] (the “**Wages Order**”); and (iv) *Final Order Authorizing (I) Payment of Certain Prepetition Claims of Critical Vendors and Foreign Vendors and (II) Financial Institutions to Honor and Process Related Checks and Transfers* on August 20, 2020 [ECF No. 309] (the “**Critical Vendors Order**” and together with the Customer Programs Order, Taxes Order, and Wages Order, the “**First Day Orders**”).

9. Detailed information regarding the Debtors’ business, capital structure, and the circumstances leading to the commencement of these Chapter 11 Cases, is set forth in the *Declaration of Ricardo Javier Sánchez Baker in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* [ECF No. 20], filed with the Court on the Petition Date.

**B. Claims Resolution Process in the Chapter 11 Cases**

10. On July 2, 2020, the Court entered an *Order Authorizing Debtors to Retain and Employ Epiq Corporate Restructuring, LLC as Claims and Noticing Agent Nunc Pro Tunc to the*

*Petition Date* [ECF No. 47], thereby appointing Epiq Corporate Restructuring, LLC (“**Epiq**”) as the Debtors’ claims and noticing agent in these Chapter 11 Cases.

11. On August 25, 2020, the Debtors filed their respective schedules of assets and liabilities [ECF Nos. 326, 328, 330, 332] and statements of financial affairs [ECF Nos. 327, 329, 331, 333] (collectively, the “**Chapter 11 Schedules**” and “**Statements**,” respectively). On August 28, 2020, the Debtors filed an amendment to the Statement filed by Debtor Aerovías de México, S.A. de C.V. [ECF No. 342]. The Debtors filed amendments to certain of the Debtors’ Chapter 11 Schedules on December 17, 2020 [ECF Nos. 737–40], as well as on January 15, 2021 [ECF Nos. 808–10].

12. On November 18, 2020, the Court entered an *Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof* [ECF No. 648] (the “**Bar Date Order**”) establishing January 15, 2021 at 5:00 p.m. (prevailing Pacific Time) as the General Bar Date (as defined in the Bar Date Order) (the “**Bar Date**”).

13. On December 11, 2020, Epiq duly served the *Notice of Deadline Requiring Filing of Proofs of Claim on or Before January 15, 2021* [ECF No. 778] (the “**Bar Date Notice**”). Between December 14, 2020 and December 16, 2020, the Debtors caused the Bar Date Notice to be published in the *New York Times International Edition*, the *New York Times*, and the *Wall Street Journal*. See Noblesala Aff., ECF No. 759; Noblesala Aff., ECF No. 760; Bell Aff., ECF No. 761.

14. In the ordinary course of business, the Debtors maintain books and records (the “**Books and Records**”) that reflect, among other things, the Debtors’ liabilities and the amounts thereof owed to their creditors.

15. The Debtors' claims register (the "**Claims Register**"), prepared and maintained by Epiq, reflects that approximately 6,053 proofs of claim (collectively, the "**Proofs of Claim**") have been filed in the Chapter 11 Cases asserting claims against the Debtors (each a "**Claim**," and collectively, the "**Claims**"). The Debtors and their advisors are continuing to comprehensively review and reconcile all Claims, including both the Claims listed on the Debtors' Chapter 11 Schedules and the Claims asserted in the Proofs of Claim (including any supporting documentation) filed in the Chapter 11 Cases. The Debtors and their advisors are also comparing the Claims asserted in the Proofs of Claims with the Debtors' Books and Records to determine the validity of the asserted Claims.

16. This reconciliation process includes identifying particular categories of Claims that the Debtors believe should be modified, reduced, reclassified, disallowed, and/or expunged. To avoid a possible double recovery or otherwise improper recovery by claimants, the Debtors will continue to file omnibus objections to such categories of Claims if and where warranted. This Objection is one such omnibus objection.

17. On February 17, 2021, the Court entered the Claims Objections Procedures Order [ECF No. 904]. Subsequently, the Court has sustained 16 omnibus claims objections filed by the Debtors in accordance the Claims Objections Procedures Order [ECF Nos. 1086–87, 1102, 1207–08, 1403–04, 1575, 1577–78, 1580–85].

18. The Debtors submit that this Objection and the notice provided to claimants in connection hereto are consistent with the Claims Objections Procedures Order, the Bankruptcy Code, and the Bankruptcy Rules.

**Basis for Relief**

19. Pursuant to section 101 of the Bankruptcy Code, a creditor holds a claim against a bankruptcy estate only to the extent that (a) it has a “right to payment” for the asserted liabilities and (b) the claim is otherwise allowable. 11 U.S.C. §§ 101(5) and 101(10).

20. When asserting a claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Lehman Bros. Holdings, Inc.*, 602 B.R. 564, 574 (Bankr. S.D.N.Y. 2019); *In re Int’l Match Corp.*, 69 F.2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *See In re Lehman Bros.*, 602 B.R. at 574. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim’s *prima facie* validity. *See In re Dreier LLP*, 544 B.R. 760, 766 (Bankr. S.D.N.Y. 2016), *aff’d*, No. 08-15051 (SMB), 2016 WL 3920358 (S.D.N.Y. July 15, 2016), *aff’d*, 683 F. App’x 78 (2d Cir. 2017) (quoting *Creamer v. Motors Liquidation Co. GUC Trust (In re Motors Liquidation Co.)*, No. 12 CIV. 6074 (RJS), 2013 WL 5549643, at \*3 (S.D.N.Y. Sept. 26, 2013) (in turn quoting *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992))). In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim’s legal sufficiency. *See In re Dreier*, 544 B.R. at 766. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *See id.*

21. A court should not deem a claim to be allowable if it is “unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11. U.S.C. § 502(b)(1). A debtor may file an omnibus claims objection if all the claims being objected to fall under one of several listed categories as described in the Bankruptcy Rules and the Claims Objections Procedures

Order. *See* Fed. R. Bankr. P. 3007(d); Claims Obj. Proc. Order, ¶ 2(a), ECF No. 904 (providing additional bases under which the Debtors may file omnibus claim objections).

### **Objection**

22. By this Objection, the Debtors object to the Claims set forth on the Schedules as follows:

<b>Schedule</b>	<b>Objection Basis(es)</b>
1	Wrong Debtor Claims <sup>3</sup>
2	Incorrectly Classified Claims
3	Foreign Currency Claims
4	Wrong Debtor and Incorrectly Classified Claims
5	Wrong Debtor and Foreign Currency Claims
6	Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims
7	Incorrectly Classified and Foreign Currency Claims
8	Amended and Duplicate Claims
9	Reduced Claims

#### **A. Wrong Debtor Claims (Schedule 1)**

23. The Debtors object to the Claims listed on Schedule 1 as such Claims were each filed against an incorrect Debtor according to the Debtors' Books and Records ("**Wrong Debtor Claims**"), and request that each Wrong Debtor Claim be modified as Claims against the proper Debtor.

24. A court should not deem a claim to be allowable if it is "unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1). Moreover, the Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to claims "filed against ... the wrong Debtor." Claims Obj. Proc. Order, ¶ 2(a)(iii).

---

<sup>3</sup> Each capitalized term used in this paragraph 22 shall have the meaning ascribed to such term in this Objection.

25. After analyzing each Wrong Debtor Claim and reviewing the Books and Records, the Debtors have determined that each Wrong Debtor Claim has been filed against the incorrect Debtor. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on a Claim, the Debtors seek to modify the Wrong Debtor Claims by reassigning the Claim from the Debtor against which such Claim was originally filed to the Debtor identified in the “Correct Debtor” column applicable thereto on Schedule 1.

**B. Incorrectly Classified Claims (Schedule 2)**

26. The Debtors object to the Claims listed on Schedule 2 and request that each such Claim be reclassified as set forth therein, as each Claim set forth on Schedule 2 is not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”).

27. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to Claims for which “[t]he claimant is not entitled to the asserted secured status or other priority.” Claims Obj. Proc. Order, ¶ 2(a)(v). After analyzing each Incorrectly Classified Claim and any documentation provided therewith, and after reviewing the Books and Records, the Debtors have determined that each Incorrectly Classified Claim, in part or in full, (i) does not accurately reflect the correct classification according to the Debtors’ Books and Records; (ii) was filed with insufficient documentation to support the asserted status or other priority thereon; and/or (iii) asserts a status or other priority that is not supported by the Bankruptcy Code or other applicable law. The specific basis for objection to each Incorrectly Classified Claim is set forth on Schedule 2 in the column labeled “Reason.”

28. The Debtors respectfully request that the Incorrectly Classified Claims be reclassified as set forth on Schedule 2 in the corresponding row labeled “Modified Claim,” to avoid claimants



from improperly receiving recoveries on account of their Incorrectly Classified Claim at the expense of the Debtors and other creditors.

**C. Foreign Currency Claims (Schedule 3)**

29. The Debtors object to the Claims set forth on Schedule 3 and request that each such Claim be converted to United States dollars as set forth therein, as such Claims were asserted in a currency other than United States dollars or Mexican pesos (the “**Foreign Currency Claims**”).

30. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to Claims filed in a currency other than United States dollars or Mexican Pesos. *See* Claims Obj. Proc. Order, ¶ 2(a)(iv). Nonetheless, through this Objection, the Debtors are *not* seeking to disallow Foreign Currency Claims. Rather, the Debtors only seek to convert such Claims to United States dollars—by first converting such Claims to Mexican pesos and then converting each such Claim from Mexican pesos to United States dollars—based on the applicable conversion rate in place on the Petition Date from Banco de Mexico (Central Bank) in accordance with the Bar Date Order. *See* Bar Date Order, ¶ 8(c), n.4 (“Where a claim has been denominated in Mexican Pesos on a Proof of Claim, the Debtors will convert such claim to one calculated in legal tender of the United States based upon the conversion rate in place as of the Petition Date from Banco de Mexico (Central Bank).”).

31. Accordingly, the Debtors respectfully request that the Court modify the amount of each Foreign Currency Claim to reflect a Claim in United States dollars as set forth on Schedule 3 in the corresponding row labeled “Modified Claim.”

**D. Wrong Debtor and Incorrectly Classified Claims (Schedule 4)**

32. The Debtors object to the Claims listed on Schedule 4 as such Claims are (i) Wrong Debtor Claims, as each such Claim was filed against an incorrect Debtor according to the Debtors’

Books and Records and (ii) Incorrectly Classified Claims, as each such Claim is not entitled to the asserted status or other priority (collectively, the “**Wrong Debtor and Incorrectly Classified Claims**”).

33. After analyzing each Wrong Debtor and Incorrectly Classified Claim set forth on Schedule 4 and any documentation provided therewith, and after reviewing the Books and Records, the Debtors have determined that each Claim (a) in part or in full, (i) does not accurately reflect the correct classification according to the Debtors’ Books and Records; (ii) was filed with insufficient documentation to support the asserted status or other priority thereon; and/or (iii) asserts a status or other priority that is not supported by the Bankruptcy Code or other applicable law and (b) has been filed against the incorrect Debtor.

34. The specific basis for objection to each Wrong Debtor and Incorrectly Classified Claim is set forth on Schedule 4 in the column labeled “Reason.” The Debtors respectfully request that the Wrong Debtor and Incorrectly Classified Claims be (i) reclassified, as set forth on Schedule 4 in the corresponding row labeled “Modified Claim,” to avoid claimants from improperly receiving recoveries on account of their Claim at the expense of the Debtors and other creditors and (ii) modified by reassigning the Claim from the Debtor against which such Claim was originally filed to the Debtor identified in the “Correct Debtor” column applicable thereto on Schedule 4.

**E. Wrong Debtor and Foreign Currency Claims (Schedule 5)**

35. The Debtors object to the Claims listed on Schedule 5 as such Claims are (i) Wrong Debtor Claims, as each such Claim was filed against an incorrect Debtor according to the Debtors’ Books and Records and (ii) Foreign Currency Claims, as each such Claim was asserted in a currency other than United States dollars or Mexican pesos (collectively, the “**Wrong Debtor and Foreign Currency Claims**”).

36. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on a Claim, the Debtors respectfully request that the Wrong Debtor and Foreign Currency Claims be (i) reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the “Correct Debtor” column applicable thereto on Schedule 5 and (ii) modified, in accordance with the conversion rate set forth in paragraph 20 herein, to reflect a Claim in United States dollars as set forth on Schedule 5 in the corresponding row labeled “Modified Claim.”

**F. Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims (Schedule 6)**

37. The Debtors object to the Claims listed on Schedule 6 as such Claims are (i) Wrong Debtor Claims, as each such Claim was filed against an incorrect Debtor according to the Debtors’ Books and Records, (ii) Incorrectly Classified Claims, as each such Claim is not entitled to the asserted status or other priority, and (iii) Foreign Currency Claims, as each such Claim was asserted in a currency other than United States dollars or Mexican pesos (collectively, the “**Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims**”).

38. After analyzing each Wrong Debtor, Incorrectly Classified, and Foreign Currency Claim set forth on Schedule 6 and any documentation provided therewith, and after reviewing the Books and Records, the Debtors have determined that each Claim (a) in part or in full, (i) does not accurately reflect the correct classification according to the Debtors’ Books and Records, (ii) was filed with insufficient documentation to support the asserted status or other priority thereon, and/or (iii) asserts a status or other priority that is not supported by the Bankruptcy Code or other applicable law; (b) has been filed against the incorrect Debtor; and (c) was asserted in a currency other than United States dollars or Mexican pesos.

39. The specific basis for objection to each Wrong Debtor, Incorrectly Classified, and Foreign Currency Claim is set forth on Schedule 6 in the column labeled “Reason.” The Debtors respectfully request that the Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims be (i) reclassified, as set forth on Schedule 6 in the corresponding row labeled “Modified Claim,” to avoid claimants from improperly receiving recoveries on account of their Claim at the expense of the Debtors and other creditors, (ii) modified by reassigning the Claim from the Debtor against which such Claim was originally filed to the Debtor identified in the “Correct Debtor” column applicable thereto on Schedule 6, and (iii) modified, in accordance with the conversion rate set forth in paragraph 20 herein, to reflect a Claim in United States dollars as set forth on Schedule 6 in the corresponding row labeled “Modified Claim.”

**G. Incorrectly Classified and Foreign Currency Claims (Schedule 7)**

40. The Debtors object to the Claims listed on Schedule 7 as such Claims are (i) Incorrectly Classified Claims, as each such Claim is not entitled to the asserted status or other priority and (ii) Foreign Currency Claims, as each such Claim was asserted in a currency other than United States dollars or Mexican pesos (collectively, the “**Incorrectly Classified, and Foreign Currency Claims**”).

41. After analyzing each Incorrectly Classified and Foreign Currency Claim set forth on Schedule 7 and any documentation provided therewith, and after reviewing the Books and Records, the Debtors have determined that each Claim (a) in part or in full, (i) does not accurately reflect the correct classification according to the Debtors’ Books and Records; (ii) was filed with insufficient documentation to support the asserted status or other priority thereon; and/or (iii) asserts a status or other priority that is not supported by the Bankruptcy Code or other applicable law and (b) was asserted in a currency other than United States dollars or Mexican pesos.

42. The specific basis for objection to each Incorrectly Classified and Foreign Currency Claim is set forth on Schedule 7 in the column labeled “Reason.” The Debtors respectfully request that the Incorrectly Classified and Foreign Currency Claims be (i) reclassified, as set forth on Schedule 7 in the corresponding row labeled “Modified Claim,” to avoid claimants from improperly receiving recoveries on account of their Claim at the expense of the Debtors and other creditors and (ii) modified, in accordance with the conversion rate set forth in paragraph 20 herein, to reflect a Claim in United States dollars as set forth on Schedule 7 in the corresponding row labeled “Modified Claim.”

**H. Amended and Duplicate Claims (Schedule 8)**

43. The Debtors object to the Claims listed on Schedule 8 and request that such Claims be disallowed and expunged in their entirety, as certain Claims set forth therein (i) have been amended or superseded by other Claims filed by or on behalf of the same claimants relating to the same purported liabilities or (ii) are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability (collectively, the “**Amended and Duplicate Claims**”).

44. A debtor cannot be required to pay the same claim multiple times. *See, e.g., Phelan v. Local 305 of United Ass’n of Journeymen & Apprentices of Plumbing and Pipefitting Indus. of U.S. & Can.*, 973 F.2d 1050, 1063 (2d Cir. 1992); *see also In re Finley, Kumble, Wagner, Heine, Underberg, Manley, Myerson & Carey*, 160 B.R. 882, 894 (Bankr. S.D.N.Y. 1993) (“In bankruptcy, multiple recoveries for an identical injury are generally disallowed.”). This Court has routinely sustained objections to amended, superseded, and duplicative claims. *See, e.g., In re LATAM Airlines Group S.A.*, No. 20-11254 (JLG) (Bankr. S.D.N.Y. Aug 3, 2021) [ECF No. 2846]; *In re Centric Brands, Inc.*, No. 20-22637 (SHL) (Bankr. S.D.N.Y. June 15, 2021) [ECF No. 926]; *In re*

*Ditech Holding Corp.*, No. 19-10412 (JLG) (Bankr. S.D.N.Y. Apr. 12, 2021) [ECF No. 3317]; *In re Windstream Holdings, Inc.*, No. 19-22397 (RDD) (Bankr. S.D.N.Y. Dec. 21, 2020) [ECF No. 2758].

45. If the Amended and Duplicate Claims identified on Schedule 8 are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. By this Objection, the Debtors seek disallowance and expungement of the Amended and Duplicate Claims in order to limit each claimant to a single Claim and recovery against the applicable Debtor's estate arising from the same alleged liability.

46. For each of the Amended and Duplicate Claims, the Debtors have identified a surviving Claim ("**Surviving Claim**"), which asserts the same liability and is identified on Schedule 8 in the applicable row labeled "Surviving Claim." Surviving Claims will be unaffected by the relief requested in this Objection, and each claimant's rights to assert these liabilities against the applicable Debtor's estate will be preserved, subject to the Debtors' reservations of their rights to object to such Surviving Claims and other Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

#### **I. Reduced Claims (Schedule 9)**

47. The Debtors object to the Claims listed on Schedule 9 and request that each such Claim be modified, as each such Claim (i) seeks to recover amounts in excess of what is reflected on the Debtors' Books and Records and/or (ii) was filed with insufficient documentation to support the asserted Claim amount (collectively, "**Reduced Claims**").

48. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections if "[t]he amount claimed is inconsistent with the Debtors' books and records and the Debtors, after review and consideration of any information provided by the claimant, deny liability in excess of the amount reflected in the Debtors' books and records" and/or if a claimant

“fails to specify sufficiently the basis for the claim or provide sufficient supporting documentation for such claim.” Claims Obj. Proc. Order, ¶ 2(a)(i) and (ii). After analyzing each of the Reduced Claims and any documentation provided therewith, the Debtors have determined that the asserted amount of each of Reduced Claim is greater than what the Debtors’ reflect on their Books and Records and/or is not supported by the documentation provided by the claimant.

49. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries in excess of what they are entitled at the expense of the Debtors and other creditors, the Debtors respectfully request that the Court modify the amount of the Reduced Claims such that the amount of each Reduced Claim corresponds with the documentation provided with the asserted proof of claim (the “**Reduction**”), as set forth in more detail on Schedule 9 in the corresponding row labeled “Reduced Claim.”

50. Further, the Reduced Claims were asserted in an unknown currency, and the supporting documentation provided therewith supports Claims in currencies other than United States dollars. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to Claims filed in a currency other than United States dollars or Mexican Pesos. Claims Obj. Proc. Order, ¶ 2(a)(iv). Nonetheless, through this Objection, the Debtors are *not* seeking to disallow the Reduced Claims simply because they were not asserted in United States dollars or Mexican Pesos. Rather, following the Reductions, the Debtors seek to convert such Claims in accordance with the procedure and conversation rate set forth in paragraph 30 herein. The Debtors respectfully request that the Court modify the amount of the Reduced Claims such that the amount of each Reduced Claim is now denominated in United States dollars, as set forth in more detail on Schedule 9 to the Proposed Order, in the corresponding row labeled “Converted Claim.”

**Separate Contested Matters**

51. Each of the Claims and the Objection with respect thereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtors request that any order entered by this Court with respect to a request for disallowance, expungement, modification, reduction, and/or reclassification herein shall be deemed a separate order with respect to each Claim.

**Response to Omnibus Objections**

52. To contest this Objection, a claimant must file and serve a written response to this Objection (a “**Response**”) so that it is received no later than the deadline set forth in the accompanying notice (the “**Response Deadline**”). All Responses shall be filed electronically with the Court on the docket of *In re Grupo Aeroméxico, S.A.B. de C.V., et al.*, Case No. 20-11563 (SCC), in accordance with the Court’s General Order M-399 (available on the Court’s website at <http://www.nysb.uscourts.gov>), by registered users of the Court’s electronic case filing (“**ECF**”) system, and served (via email or otherwise) so as to be actually received on or before the Response Deadline upon:

Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, New York 10017  
Attn: Timothy Graulich (timothy.graulich@davispolk.com)  
Stephen D. Piraino (stephen.piraino@davispolk.com)  
Erik P. Jerrard (erik.jerrard@davispolk.com)  
Richard J. Steinberg (richard.steinberg@davispolk.com)  
*Counsel to the Debtors*

-and-

Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, New York 10019  
Attn: Brett H. Miller (bmiller@willkie.com)  
Todd M. Goren (tgoren@willkie.com)  
Craig Damast (cdamast@willkie.com)  
Debra M. Sinclair (dsinclair@willkie.com)  
*Counsel to the Creditors’ Committee.*



53. Every Response to this Objection must contain, at a minimum, the following information:

- a. A caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number, and title of the Objection to which the response is directed;
- b. The name of the claimant and a description of the basis for the amount of the Claim;
- c. A concise statement setting forth the reasons why the Claim should not be disallowed, expunged, reduced, or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which will be relied on in opposing the Objection;
- d. All documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which will be relied on in opposing the Objection; and
- e. The address(es) to which the Debtors must return any reply to the Response, if different from that presented in the Proof of Claim; and
- f. The name, address, and telephone number of the person (which may be the claimant or their legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on the claimant's behalf.

54. If a claimant fails to file and serve a timely Response by the Response Deadline, the Debtors may present to the Court an appropriate order disallowing, expunging, modifying, reducing, and/or reclassifying their Claim(s), without further notice or a hearing.

#### **Reservation of Rights**

55. The Debtors expressly reserve the right to amend, modify, or supplement this Objection, including, without limitation, to modify the currency associated with each Claim set forth on the Schedules. The Debtors further reserve their right to object to the: (i) Wrong Debtor Claims; (ii) Incorrectly Classified Claims; (iii) Foreign Currency Claims; (iv) Amended Claims; (v) Duplicate Claims; and/or (vi) Reduced Claims on any other grounds that the Debtors discover or elect to pursue, unless such Claims are disallowed and expunged from the Claims Register. The

Debtors reserve their right to assert substantive and/or one or more additional non-substantive objections to the Claims subject to this Objection at a later time.

56. Notwithstanding anything contained in this Objection, the exhibits attached hereto, or the Schedules, nothing herein shall be construed as a waiver of any rights that the Debtors may have to (i) commence avoidance actions under the applicable sections of the Bankruptcy Code, including, but not limited to, sections 547 and 548 of the Bankruptcy Code, against the claimants subject to this Objection, (ii) enforce the Debtors' rights of setoff against the claimants relating to such avoidance actions, or (iii) seek disallowance pursuant to section 502(d) of the Bankruptcy Code of Claims of the claimants that are subject to such avoidance actions.

#### **Notice**

57. Notice of this Objection will be given to (i) the United States Trustee for the Southern District of New York; (ii) each party listed on the Schedules; (iii) each party listed in paragraph 2(h) of the Claims Objections Procedures Order; and (iv) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

#### **No Prior Request**

58. The Debtors have not previously sought the relief requested herein from the Court or any other court.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit 1**, granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: August 18, 2021  
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*

**Exhibit 1 to Objection**

**Proposed Order**

**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)**

**ORDER GRANTING DEBTORS' EIGHTEENTH OMNIBUS CLAIMS  
OBJECTION TO PROOFS OF CLAIM (WRONG DEBTOR, INCORRECTLY  
CLASSIFIED, FOREIGN CURRENCY, MISCLASSIFIED UNLIQUIDATED,  
AMENDED AND DUPLICATE, AND/OR REDUCED CLAIMS)**

Upon the objection (the “**Objection**”)<sup>2</sup> of the above-captioned Debtors, pursuant to sections 105 and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, seeking to (a) modify, reduce, and/or reclassify the Claims identified on **Schedules 1, 2, 3, 4, 5, 6, 7, and 9** attached hereto, as described therein and (b) disallow and expunge the Claims identified on **Schedule 8** attached hereto; and upon the Sánchez Declaration, attached to the Objection as **Exhibit 2**; and the Court having jurisdiction to consider the matters raised in the Objection pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and the Court having authority to hear the matters raised in the Objection pursuant to 28 U.S.C. § 157; and venue being proper before this Court pursuant to 28 U.S.C. § § 1408 and 1409; and consideration of the Objection and the relief requested therein being a core proceeding that the Court can determine pursuant to 28 U.S.C. § 157(b)(2); and due and proper notice of the Objection and opportunity for a

---

<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; 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.

<sup>2</sup> Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

hearing on the Objection having been given to the parties listed therein, and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the Objection; and the Court having the opportunity to hold a hearing on the Objection; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having found that the relief granted herein being in the best interests of the Debtors, their creditors, and all other parties in interest; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Objection is hereby granted as set forth herein.
2. The Wrong Debtor Claims identified on **Schedule 1** annexed hereto are hereby modified as described therein such that each Wrong Debtor Claim is hereby reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the column labeled “Correct Debtor” applicable thereto on **Schedule 1**.
3. The Incorrectly Classified Claims identified on **Schedule 2** annexed hereto are hereby reclassified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 2** and, to the extent reclassified by this Order, shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11 Cases.
4. The Foreign Currency Claims identified on **Schedule 3** annexed hereto are hereby modified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 3**.
5. The Wrong Debtor and Incorrectly Classified Claims identified on **Schedule 4** annexed hereto are hereby modified as described therein such that each Claim is hereby (i) reassigned from the Debtor against which such Claim was originally filed to the Debtor identified

in the row labeled “Modified Claim” applicable thereto on **Schedule 4** and (ii) reclassified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 4**, and, to the extent reclassified by this Order, such Claims shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11 Cases.

6. The Wrong Debtor and Foreign Currency Claims identified on **Schedule 5** annexed hereto are hereby modified as described therein such that each Claim is hereby (i) reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the row labeled “Modified Claim” applicable thereto on **Schedule 5** and (ii) modified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 5**.

7. The Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims identified on **Schedule 6** annexed hereto are hereby modified as described therein such that each Claim is hereby (i) reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the row labeled “Modified Claim” applicable thereto on **Schedule 6**, (ii) reclassified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 6**, and, to the extent reclassified by this Order, such Claims shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11 Cases, and (iii) modified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 6**.

8. The Incorrectly Classified and Foreign Currency Claims identified on **Schedule 7** annexed hereto are hereby modified as described therein such that each Claim is hereby (i) reclassified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 7**, and, to the extent reclassified by this Order, such Claims shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11

Cases and (ii) modified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 7**.

9. The Amended and Duplicate Claims identified on **Schedule 8** annexed hereto are hereby disallowed and expunged in their entirety.

10. The Reduced Claims identified on **Schedule 9** annexed hereto are hereby reduced and or/modified as set forth therein, and shall be reflected in the Claims Register in the amounts set forth on **Schedule 9** in the row labeled “Converted Claim.”

11. All Claims identified on **Schedule 8** annexed hereto as a “Surviving Claim” will be unaffected by the relief granted herein, and the claimants’ rights to assert the liabilities in connection with the Surviving Claims against the applicable Debtor’s estate will be preserved, subject to the Debtors’ reservations of their rights to object to such Surviving Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

12. This Order shall be deemed a separate Order with respect to each of the Claims identified on the Schedules annexed hereto. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

13. The Debtors, Epiq Corporate Restructuring, LLC, and the Clerk of this Court are authorized to take, or refrain from taking, any action necessary or appropriate to implement the terms of, and the relief granted in, this Order without seeking further order of the Court.

14. Notwithstanding any Bankruptcy Rule, the Local Bankruptcy Rules for the Southern District of New York, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.



15. This Court shall retain jurisdiction to hear and determine all matters arising from, arising under, or related to the Chapter 11 Cases, to the fullest extent permitted by law, including, without limitation, to enforce this Order.

Dated: \_\_\_\_\_, 2021  
New York, New York

---

THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE

**Schedule 1**

**Wrong Debtor Claims**

**Wrong Debtor Claims**

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
1	14824	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	ALBERTO, FIS GROSSMAN ALLAN AV. CONSTITUYENTES 1080-3 LOMAS ALTAS MIGUEL HIDALGO DISTRITO FEDERAL 11950 MEXICO	0.00	0.00	0.00	6,086.45	6,086.45 USD	No
	<b>Date Filed:</b>	12/29/2020									
2	11044	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	BAEK, SEULGI CHUNGCHEONGNAM-DO, REPUBLIC OF KOREA 67, MOSAN-RO,BAEBANG- EUP,ASAN-SI104-1903 ASAN 31480 SOUTH KOREA	0.00	0.00	0.00	1,124.38	1,124.38 USD	No
	<b>Date Filed:</b>	12/29/2020									
3	11046	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	BAEK, SEULGI CHUNGCHEONGNAM-DO, REPUBLIC OF KOREA 67,MOSAN-RO,BAEBANG- EUP,ASAN-SI,104-1903 ASAN 31480 SOUTH KOREA	0.00	0.00	0.00	518.82	518.82 USD	No
	<b>Date Filed:</b>	1/15/2021									
4	14477	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	BON VOYAGE TRAVEL 4229 ROCKY FORD DR LOVELAND CO 80538	0.00	0.00	0.00	1,383.30	1,383.30 USD	No
	<b>Date Filed:</b>	1/4/2021									
5	11588	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	4,100.49	4,100.49 USD	No
	<b>Date Filed:</b>	1/4/2021									
6	11590	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	4,123.88	4,123.88 USD	No
	<b>Date Filed:</b>	1/4/2021									

\* Pursuant to ¶ 8(d), n.4 of the Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof [ECF No. 648] (the “Bar Date Order”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

**Wrong Debtor Claims**

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total(*)	Unliquidated
7	11591	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	4,173.12	4,173.12 USD	No
<b>Date Filed:</b>	1/4/2021										
8	11592	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	3,811.32	3,811.32 USD	No
<b>Date Filed:</b>	1/4/2021										
9	11593	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	4,636.00	4,636.00 USD	No
<b>Date Filed:</b>	1/4/2021										
10	11595	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	2,881.00	2,881.00 USD	No
<b>Date Filed:</b>	1/4/2021										
11	11597	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	3,105.00	3,105.00 USD	No
<b>Date Filed:</b>	1/4/2021										
12	11598	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	3,528.00	3,528.00 USD	No
<b>Date Filed:</b>	1/4/2021										

**Wrong Debtor Claims**

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total(*)	Unliquidated
13	11599	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	1,995.00	1,995.00 USD	No
<b>Date Filed:</b>	1/4/2021										
14	11600	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	3,444.00	3,444.00 USD	No
<b>Date Filed:</b>	1/4/2021										
15	11602	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	4,410.00	4,410.00 USD	No
<b>Date Filed:</b>	1/4/2021										
16	11604	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	EDUCATIONAL OPPORTUNITIES TOURS PO BOX 6929 LAKELAND FL 33807	0.00	0.00	0.00	4,223.00	4,223.00 USD	No
<b>Date Filed:</b>	1/29/2021										
17	14753	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	FAIRPLAY VOYAGES IATA 20209770 166 AVENUE DE PARIS VINCENNES 94300 FRANCE	0.00	0.00	0.00	901.00	901.00 USD	No
<b>Date Filed:</b>	1/20/2021										
18	14754	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	FAIRPLAY VOYAGES IATA 20209770 166 AVENUE DE PARIS VINCENNES 94300 FRANCE	0.00	0.00	0.00	901.00	901.00 USD	No
<b>Date Filed:</b>	11/13/2020										

**Wrong Debtor Claims**

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
19	127	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	GBT TRAVEL SERVICES UK LTD C/O TRAVEL PLACES ATTN MARTIN ROWE 61 CHAPEL RD, PODIUM HOUSE WORTHING, SUSSEX BN11 1HR UK	0.00	0.00	0.00	35,353.00	35,353.00 USD	No
	<b>Date Filed:</b>	6/23/2021									
20	20549	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	GONZALEZ, IVETTE MUÑOZ 9905 63RD DR, APT 9P REGO PARK NY 11374	0.00	0.00	0.00	910.02	910.02 USD	No
	<b>Date Filed:</b>	1/12/2021									
21	13065	No	Aerovías Empresa de Cargo, S.A. de C.V.	Aerovías de México, S.A. de C.V.	HWANG, EUNHYE 71, HWAGOK-RO 63GA-GIL, GANGSEO-GU SEOUL 07578 REPUBLIC OF KOREA	0.00	0.00	0.00	884.30	884.30 USD	No
	<b>Date Filed:</b>	1/15/2021									
22	14282	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	JO, SANGUK 91101-1305 GWAHAKSANDAN 2-RO 20BEON-GIL GANGSEO-GU PSAN 46743 SOUTH KOREA	0.00	0.00	0.00	857.81	857.81 USD	No
	<b>Date Filed:</b>	12/28/2020									
23	199	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	KIM, SUNGSOO C/O HANA TOUR 5 GIL 41 INSA-DONG JONGRO-GU, SEOUL 03161 SOUTH KOREA	0.00	0.00	0.00	5,438.41	5,438.41 USD	No
	<b>Date Filed:</b>	1/15/2021									
24	14444	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	MOODY METHODIST CHURCH 2803 53RD ST GALVESTON TX 77551	0.00	0.00	0.00	1,784.00	1,784.00 USD	No
	<b>Date Filed:</b>	1/9/2021									

**Wrong Debtor Claims**

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total(*)	Unliquidated
25	12327	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	OROZCO, MARIA 121 N WILLARD RD CANTON MI 48187	0.00	0.00	0.00	0.00	0.00 USD	Yes
<b>Date Filed:</b>		12/27/2020									
26	10779	No	Aerovías Empresa de Cargo, S.A. de C.V.	Aerovías de México, S.A. de C.V.	PARK, HYEMI 604-705, 181, YEOSEO-RO YEOSU-SI, 59707 SOUTH KOREA	0.00	0.00	0.00	518.19	518.19 USD	No
<b>Date Filed:</b>		1/25/2021									
27	14735	No	Aerovías Empresa de Cargo, S.A. de C.V.	Aerovías de México, S.A. de C.V.	PARK, SANGJUN FLOOR 3, 16-7, NORYANGJIN-RO 28-GIL DONGJAK-GU SEOUL 06908 REPUBLIC OF KOREA	0.00	0.00	0.00	1,027.42	1,027.42 USD	No
<b>Date Filed:</b>		1/29/2021									
28	14755	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	PLUS VOYAGES C/O AGENCE PLUS VOYAGES 135 BOULEVARD HAUSSMANN PARIS 75008 FRANCE	0.00	0.00	0.00	11,005.00	11,005.00 USD	No
<b>Date Filed:</b>		6/25/2021									
29	14882	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	SANCHEZ, STEPHANIE 55 TRAVELER ST BOSTON MA 02118	0.00	0.00	0.00	515.86	515.86 USD	No
<b>Date Filed:</b>		1/15/2021									
30	14359	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	SELLAMI, LAETITIA 25, RUE DE PONTHEU, BAT. C - RDC PARIS 75008 FRANCE	0.00	0.00	0.00	230,569.94	230,569.94 USD	No
<b>Date Filed:</b>		12/9/2020									

**Wrong Debtor Claims**

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total(*)	Unliquidated
31	10324	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	SIGNAL TOURS LTD SOKOLOVE 33 RAMAT HASHARON 47236 ISRAEL	0.00	0.00	0.00	0.00	0.00 USD	Yes
<b>Date Filed:</b>		1/4/2021									
32	235	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	TE CONNECTIVITY CORPORATION ATTN JEFF ROWOTH, GLOBAL TRAVEL MANAGER 2800 FULLING MILL RD, MAILSTOP 060 MIDDLETOWN PA 17057-3142	0.00	0.00	0.00	3,179.81	3,179.81 USD	No
<b>Date Filed:</b>		1/15/2021									
33	14446	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	TRAVELCONCEPT SL AV. COMTE DE SALIENT, N° 3 PLANTA 3ª PALMA DE MALLORCA, IB 07003 SPAIN	0.00	0.00	0.00	82,020.33	82,020.33 USD	No
<b>Date Filed:</b>											
<b>Wrong Debtor Claim Totals</b>				<b>Count:</b>	<b>USD</b>	<b>33</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>429,409.85</b>



**Schedule 2 to Proposed Order**

**Incorrectly Classified Claims**

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	20474	No	Aerovías de México, S.A. de C.V.	AC TOURS SAC AV JORGE VANDERGHEN 241 MIRAFLORES LIMA 18 PERU	58,972.86	0.00	58,972.86	0.00	58,972.86 USD	No	Insufficient documentation to support secured, priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20474	No		0.00	0.00	0.00	58,972.86	58,972.86 USD	No	
2	20505	No	Aerovías de México, S.A. de C.V.	ALIANZA CHINA SC PUERTO CASTILLA 3858 COL LAS BRISAS MONTERREY NL 64780 MÉXICO	0.00	1,440.06	0.00	0.00	1,440.06 USD	Yes	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/29/2021									
	<b>Modified Claim:</b>	20505	No		0.00	0.00	0.00	1,440.06	1,440.06 USD	Yes	
3	20382	No	Aerovías de México, S.A. de C.V.	ANDRADE, ERICK MICHELLE MORALES FELIPE ANGELES #119 COLONIA PLAYA AZUL IRAPUATO 36555 MEXICO	1,887.62	0.00	0.00	1,887.62	1,887.62 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	20382	No		0.00	0.00	0.00	1,887.62	1,887.62 USD	Yes	
4	20219	No	Aerovías de México, S.A. de C.V.	BIVESTOUR AGENCIA DE VIAJES PADRE DON RUA 10 VIGO 36203 SPAIN	912.00	0.00	0.00	0.00	912.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	20219	No		0.00	0.00	0.00	912.00	912.00 USD	No	

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
5	20413	No	Aerovías de México, S.A. de C.V.	BIVESTOUR AGENCIA DE VIAJES PADRE DON RUA 10 VIGO 36203 SPAIN	222.00	0.00	0.00	0.00	222.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20413	No		0.00	0.00	0.00	222.00	222.00 USD	No	
6	20415	No	Aerovías de México, S.A. de C.V.	BIVESTOUR AGENCIA DE VIAJES PADRE DON RUA 10 VIGO 36203 SPAIN	1,755.00	0.00	0.00	0.00	1,755.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20415	No		0.00	0.00	0.00	1,755.00	1,755.00 USD	No	
7	20454	No	Aerovías de México, S.A. de C.V.	CENTRO DE AGENCIAS CORPORATIVAS SAC AV. JOSE PARDO 801 MIRAFLORES LIMA 18 PERU	28,539.29	0.00	0.00	0.00	28,539.29 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20454	No		0.00	0.00	0.00	28,539.29	28,539.29 USD	Yes	
8	20456	No	Aerovías de México, S.A. de C.V.	CENTRO DE AGENCIAS CORPORATIVAS SAC AV. JOSE PARDO 801 MIRAFLORES LIMA 18 PERU	9,916.41	0.00	0.00	0.00	9,916.41 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20456	No		0.00	0.00	0.00	9,916.41	9,916.41 USD	Yes	

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
9	20457	No	Aerovías de México, S.A. de C.V.	CENTRO DE AGENCIAS CORPORATIVAS SAC AV. JOSE PARDO 801 MIRAFLORES LIMA 18 PERU	2,280.00	0.00	0.00	0.00	2,280.00 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20457	No		0.00	0.00	0.00	2,280.00	2,280.00 USD	Yes	
10	20464	No	Aerovías de México, S.A. de C.V.	CONEXION TS CALLE GERMAN SCHREIBER 276 - SAN ISIDRO LIMA 27 PERU	8,008.64	0.00	0.00	0.00	8,008.64 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20464	No		0.00	0.00	0.00	8,008.64	8,008.64 USD	Yes	
11	12124	No	Aerovías de México, S.A. de C.V.	FLEX INTERNATIONAL CO LTD AD TAKADANOBABA BLD, 4F 3-35-2, TAKADANOBABA, SHINJUKU-KU TOKYO 169-0075 JAPAN	0.00	5,526.44	0.00	0.00	5,526.44 USD	Yes	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/7/2021									
	<b>Modified Claim:</b>	12124	No		0.00	0.00	0.00	5,526.44	5,526.44 USD	Yes	
12	20401	No	Aerovías de México, S.A. de C.V.	GARZA, OLGA GUADALUPE GARZA HECTOR 3004 COL CUMBRES 2DO SECTOR MONTERREY NL 64610 MEXICO	2,395.05	0.00	0.00	0.00	2,395.05 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	20401	No		0.00	0.00	0.00	2,395.05	2,395.05 USD	Yes	

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
13	13295	No	Aerovías de México, S.A. de C.V.	GZMEIYA ECOMMERCE INT'L TRAVEL AGENCY CO 13-14 FLOOR, NO.520 GZ NORTH AVENUE SINYINK. 520 INFORMATION PORT GUANGZHOU 51000 CHINA	5,452.92	0.00	0.00	104,063.93	109,516.85 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	13295	No		0.00	0.00	0.00	109,516.85	109,516.85 USD	Yes	
14	20211	No	Aerovías de México, S.A. de C.V.	ISHITANI, EIICHIRO CALLE PASEO DE LOCUTORES NO. 62, EDIFICIO GALCO IV, A6-2 SANTO DOMINGO DN 10147 DOMINICAN REPUBLIC	0.00	2,227.75	0.00	0.00	2,227.75 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/8/2021									
	<b>Modified Claim:</b>	20211	No		0.00	0.00	0.00	2,227.75	2,227.75 USD	No	
15	14374	No	Aerovías de México, S.A. de C.V.	J WORLD TRAVEL CO LTD NH AOYAMA BLD 8F, 3-2-5 KITA-AOYAMA, MINATO-KU TOKYO 1070061 JAPAN	0.00	2,885.00	0.00	0.00	2,885.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14374	No		0.00	0.00	0.00	2,885.00	2,885.00 USD	No	
16	12237	No	Aerovías de México, S.A. de C.V.	KUNUGI, HATSUHO 307 FERIS COURT SAIWAICHO 17 NISHIMABASHI MATSUDO CHIBA 2710047 JAPAN	1,517.50	0.00	0.00	0.00	1,517.50 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/9/2021									
	<b>Modified Claim:</b>	12237	No		0.00	0.00	0.00	1,517.50	1,517.50 USD	Yes	

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
17	10442	No	Aerovías de México, S.A. de C.V.	LEE MI YOUNG & CHAE MUN CHEOL 57-8 504,YANGJAEDAERO 124-GIL,GANGDONGGU SEOUL 05301 REPUBLIC OF KOREA(SOUTH KOREA)	2,155.10	0.00	0.00	0.00	2,155.10 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/13/2020									
	<b>Modified Claim:</b>	10442	No		0.00	0.00	0.00	2,155.10	2,155.10 USD	Yes	
18	20172	No	Aerovías de México, S.A. de C.V.	MARTINEZ, CARLOS IVAN MONTAÑA QUINTA REAL 174 REAL DE ARBOLEDAS CELAYA GT 38060 MEXICO	0.00	0.00	692.00	0.00	692.00 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/5/2021									
	<b>Modified Claim:</b>	20172	No		0.00	0.00	0.00	692.00	692.00 USD	Yes	
19	20469	No	Aerovías de México, S.A. de C.V.	NUGENT, JESSICA LOURDES TORRICO ALBERTO ALEXANDER 2571 TERCER PISO LIMA LINCE PERU	212.22	0.00	0.00	0.00	212.22 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20469	No		0.00	0.00	0.00	212.22	212.22 USD	Yes	
20	12913	No	Aerovías de México, S.A. de C.V.	PESTEIL, DANIEL RUE DE LA BESSADE USSEL FR 19200 FRANCE	1,599.88	1,599.88	1,599.88	0.00	1,599.88 USD	No	Insufficient documentation to support secured, priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/12/2021									
	<b>Modified Claim:</b>	12913	No		0.00	0.00	0.00	1,599.88	1,599.88 USD	No	

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
21	11943	No	Aerovías de México, S.A. de C.V.	PRESTES, TAYANNE QUEVEDO 12418 COLT CT MAGNOLIA 77354	0.00	0.00	703.55	0.00	703.55 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/6/2021									
	<b>Modified Claim:</b>	11943	No		0.00	0.00	0.00	703.55	703.55 USD	Yes	
22	20451	No	Aerovías de México, S.A. de C.V.	QUEIROLO, GIULIANNA BACIGALUPO VAN GOGH 366 SAN BORJA LIMA 41 PERU	1,539.76	0.00	1,539.76	0.00	1,539.76 USD	Yes	Insufficient documentation to support secured, priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20451	No		0.00	0.00	0.00	1,539.76	1,539.76 USD	Yes	
23	20155	No	Aerovías de México, S.A. de C.V.	SILK TRAVEL SLU CARDENUELA RIOPICO 9 F - 6°C MADRID, 28050 SPAIN	1,477.09	0.00	0.00	0.00	1,477.09 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/30/2020									
	<b>Modified Claim:</b>	20155	No		0.00	0.00	0.00	1,477.09	1,477.09 USD	No	
24	20089	No	Aerovías de México, S.A. de C.V.	VILLA, HUGO OTONIEL LARA C DEL OLMO 10816 FRACC CHAPULTEPEC TIJUANA, BC 22020 MEXICO	800.00	0.00	0.00	0.00	800.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/9/2020									
	<b>Modified Claim:</b>	20089	No		0.00	0.00	0.00	800.00	800.00 USD	No	

**Incorrectly Classified Claim Totals**      **Count:**      **USD**      **24**      **129,643.34**      **13,679.13**      **63,508.05**      **105,951.55**      **247,182.07**

**Schedule 3 to Proposed Order**

**Foreign Currency Claims**



**Foreign Currency Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	13992	No	Aerovías de México, S.A. de C.V.	DIVERSITY TRAVEL MANCHESTER ONE - 15 FLOOR 53 PORTLAND STREET MANCHESTER M1 3LD UNITED KINGDOM	0.00	0.00	0.00	141.00	141.00 GBP	No
	<b>Date Filed:</b>	1/14/2021								
	<b>Modified Claim:</b>	13992	No		0.00	0.00	0.00	173.01	173.01 USD	No
2	14432	No	Aerovías de México, S.A. de C.V.	FALCONI, KATIA MANCHESTER ONE - 15 FLOOR MANCHESTER M1 3LD UNITED KINGDOM	0.00	0.00	0.00	2,330.46	2,330.46 GBP	No
	<b>Date Filed:</b>	1/15/2021								
	<b>Modified Claim:</b>	14432	No		0.00	0.00	0.00	2,859.59	2,859.59 USD	No
3	12503	No	Aerovías de México, S.A. de C.V.	JEON, WONGU 38, DASANJUNGANG-RO 145BEON-GIL, NAMYANGJU-SI, GYEONGGI-DO, NAMYANGJU-SI, 12248 SOUTH KOREA	0.00	0.00	0.00	1,626,600.00	1,626,600.00 KRW	No
	<b>Date Filed:</b>	1/10/2021								
	<b>Modified Claim:</b>	12503	No		0.00	0.00	0.00	1,354.14	1,354.14 USD	No
<b>Foreign Currency Claim Totals</b>			<b>Count:</b>	<b>GBP</b>	<b>2</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2,471.46</b>	<b>2,471.46</b>
				<b>KRW</b>	<b>1</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,626,600.00</b>	<b>1,626,600.00</b>

**Schedule 4 to Proposed Order**

**Wrong Debtor and Incorrectly Classified Claims**

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total(*)	Unliquidated	Reason
1	656	No	Grupo Aeroméxico, S.A.B. de C.V.	ADACHI, ADRIANA PATRICIA BUSTILLO SHIZUOKA KEN, FUJIEDA SHI, MAEJIMA 3-6-19 301 T 426-0067 JAPAN	1,618.00	0.00	1,618.00	0.00	1,618.00 USD	No	Insufficient documentation to support secured and priority claim
<b>Date Filed:</b>	1/19/2021										
<b>Modified Claim:</b>	656	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,618.00	1,618.00 USD	No	
2	697	No	Grupo Aeroméxico, S.A.B. de C.V.	ALBERTO PORTELA LISTE & NOEMI LOMBA RODRIGUEZ 1-A 1 <sup>o</sup> PLAZA CONSTITUCION CUNTIS PONTEVENNA 36670 SPAIN	0.00	0.00	1,149.06	0.00	1,149.06 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	2/1/2021										
<b>Modified Claim:</b>	697	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,149.06	1,149.06 USD	No	
3	285	No	Grupo Aeroméxico, S.A.B. de C.V.	ALVAREZ, GERARDO ARGUILEZ 4492 CAMINO DE LA PLAZA, #2076 SAN YSIDRO CA 92173	0.00	0.00	30,176.00	0.00	30,176.00 MXN	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	12/21/2020										
<b>Modified Claim:</b>	285	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,306.93	1,306.93 USD	No	
4	14660	No	Grupo Aeroméxico, S.A.B. de C.V.	AMANQUAH, RAYMOND 6151 BUENA VISTA AVE OAKLAND CA 94618	0.00	0.00	1,768.69	0.00	1,768.69 USD	Yes	Insufficient documentation to support priority claim
<b>Date Filed:</b>	1/15/2021										
<b>Modified Claim:</b>	14660	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,768.69	1,768.69 USD	Yes	

(\*) Pursuant to ¶ 8(d), n.4 of the *Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof* [ECF No. 648] (the “**Bar Date Order**”), certain Claims that were originally denominated in Mexican pesos have been converted to United States dollars, based upon the conversion rate in place as of June 30, 2020 from Banco de Mexico (Central Bank).

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
5	13709	No	Grupo Aeroméxico, S.A.B. de C.V.	APG INC 66 AVENUE DES CHAMPS ELYSEES PARIS 75008 FRANCE	0.00	863.39	0.00	0.00	863.39 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	13709	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	863.39	863.39 USD	No	
6	20507	No	Grupo Aeroméxico, S.A.B. de C.V.	ARIZAGA, ARMANDO 3464 HORTON CIR CLIVE IA 50325	1,319.49	0.00	0.00	0.00	1,319.49 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/30/2021									
	<b>Modified Claim:</b>	20507	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,319.49	1,319.49 USD	Yes	
7	20157	No	Grupo Aeroméxico, S.A.B. de C.V.	ARTADI, JUAN ALBERTO ORTIZ DE ELGUEA CALLE SEGOVIA 16, PISO 1, PUERTA 5 MADRID, 28977 SPAIN	1,089.20	0.00	0.00	0.00	1,089.20 USD	No	Insufficient documentation to support secured and priority claim
	<b>Date Filed:</b>	12/31/2020									
	<b>Modified Claim:</b>	20157	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,089.20	1,089.20 USD	No	
8	20490	No	Grupo Aeroméxico, S.A.B. de C.V.	AUTRE CIEL VOYAGES 7 PLACE DE LA REPUBLIQUE AURAY 56400 FRANCE	4,793.68	0.00	0.00	0.00	4,793.68 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/18/2021									
	<b>Modified Claim:</b>	20490	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	4,793.68	4,793.68 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
9	20168	No	Grupo Aeroméxico, S.A.B. de C.V.	AVILA, LUIS ALBERTO MARTINEZ PARQUE ZEMPOALA # 30 JARDINES DEL ALBA CUAUTITLAN IZCALLI 54750 MEXICO	72,389.00	0.00	0.00	0.00	72,389.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/4/2021									
	<b>Modified Claim:</b>	20168	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,135.17	3,135.17 USD	No	
10	310	No	Grupo Aeroméxico, S.A.B. de C.V.	AVILES, DIEGO ERNESTO NAVARRO 519 RUE CARROLL LA SALLE QC H8P 2V5 CANADA	0.00	0.00	1,004.25	0.00	1,004.25 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	310	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,004.25	1,004.25 USD	No	
11	11048	No	Grupo Aeroméxico, S.A.B. de C.V.	BARBI, MARGARET 1825 WURZBURG DR FORT WORTH TX 76134	0.00	0.00	847.55	0.00	847.55 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/29/2020									
	<b>Modified Claim:</b>	11048	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	847.55	847.55 USD	No	
12	20306	No	Grupo Aeroméxico, S.A.B. de C.V.	BARRIGON, MARCO COLOMER GLORIETA DE CUATRO CAMINOS, 6 MADRID 28020 SPAIN	10,200.00	0.00	0.00	0.00	10,200.00 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	20306	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	10,200.00	10,200.00 USD	Yes	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
13	219	No	Grupo Aeroméxico, S.A.B. de C.V.	BENOIT, HELEN 181 JAMES ST N, #412 HAMILTON ON L8R 2K9 CANADA	0.00	0.00	1,141.74	0.00	1,141.74 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/4/2021									
	<b>Modified Claim:</b>	219	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,141.74	1,141.74 USD	No	
14	14022	No	Grupo Aeroméxico, S.A.B. de C.V.	BETTER WORLD TOURS 2807 E SENECA ST TUCSON AZ 85716	0.00	0.00	3,050.00	0.00	3,050.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	14022	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,050.00	3,050.00 USD	No	
15	20267	No	Grupo Aeroméxico, S.A.B. de C.V.	BIVESTOUR AGENCIA DE VIAJES PLAZA COMPOSTELA 4 BAJO VIGO PO 36201 PO SPAIN	1,706.00	0.00	0.00	0.00	1,706.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	20267	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,706.00	1,706.00 USD	No	
16	273	No	Grupo Aeroméxico, S.A.B. de C.V.	CAMACHO, LUIS M 10805 GLENHAVEN WAY RANCHO CORDOVA CA 95670	0.00	708.34	708.34	708.34	708.34 USD	No	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/12/2021									
	<b>Modified Claim:</b>	273	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	708.34	708.34 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
17	10952	No	Grupo Aeroméxico, S.A.B. de C.V.	CAMPBELL, DANIEL P 1149 DREWSBURY CT SE SMYRNA GA 30080	0.00	0.00	1,361.33	0.00	1,361.33 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/28/2020									
	<b>Modified Claim:</b>	10952	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,361.33	1,361.33 USD	No	
18	14878	No	Grupo Aeroméxico, S.A.B. de C.V.	CANO, PATRICIO AV. PASEO DE LAS AVES 2442 CASA 49 - ZOI CAÑADAS ZAPOPAN JA 45187 MEXICO	0.00	0.00	2,500.00	0.00	2,500.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	6/14/2021									
	<b>Modified Claim:</b>	14878	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,500.00	2,500.00 USD	No	
19	20212	No	Grupo Aeroméxico, S.A.B. de C.V.	CARMONA, CLAUDIA 788 COLONEL LEDYARD HWY LEDYARD CT 06339	2,311.24	0.00	0.00	0.00	2,311.24 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/8/2021									
	<b>Modified Claim:</b>	20212	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,311.24	2,311.24 USD	No	
20	10484	No	Grupo Aeroméxico, S.A.B. de C.V.	CARNERO, MARIELA 139 SPANNER ST MONROVIA CA 91016	0.00	400.00	0.00	0.00	400.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	12/15/2020									
	<b>Modified Claim:</b>	10484	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	400.00	400.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
21	20134	No	Grupo Aeroméxico, S.A.B. de C.V.	CASTILLO, GEORGINA SACHEZ 3240 MIDDLEFIELD RD, APT 4 MENLO PARK CA 94025	1,358.80	0.00	0.00	0.00	1,358.80 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/21/2020									
	<b>Modified Claim:</b>	20134	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,358.80	1,358.80 USD	Yes	
22	10365	No	Grupo Aeroméxico, S.A.B. de C.V.	CENTERS, MARA LYNN PO BOX 214034 SACRAMENTO CA 95821-0034	448.47	0.00	0.00	0.00	448.47 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/10/2020									
	<b>Modified Claim:</b>	10365	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	448.47	448.47 USD	Yes	
23	20447	No	Grupo Aeroméxico, S.A.B. de C.V.	CENTRO DE AGENCIAS CORPORATIVAS SAC AV. JOSE PARDO 801 MIRAFLORES LIMA 18 PERU	5,519.94	0.00	0.00	0.00	5,519.94 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20447	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	5,519.94	5,519.94 USD	No	
24	14284	No	Grupo Aeroméxico, S.A.B. de C.V.	CHAN, JOCELYN 5 MCCREERY DR HILLSBOROUGH CA 94010	0.00	0.00	739.46	0.00	739.46 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14284	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	739.46	739.46 USD	No	



**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
25	10571	No	Grupo Aeroméxico, S.A.B. de C.V.	CHAN, KA LAM 115 E 54TH ST, 3RD FL NEW YORK NY 10022	0.00	0.00	784.35	0.00	784.35 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/20/2020									
	<b>Modified Claim:</b>	10571	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	784.35	784.35 USD	No	
26	10568	No	Grupo Aeroméxico, S.A.B. de C.V.	CHEN, YALI NO 34, SHILI LI VILLAGE PENGHU COUNTY, MAGON CITY, 880 TAIWAN	858.74	0.00	0.00	0.00	858.74 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/20/2020									
	<b>Modified Claim:</b>	10568	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	858.74	858.74 USD	No	
27	14052	No	Grupo Aeroméxico, S.A.B. de C.V.	CRUCIANI, TRISTAN 118 RUE CHAMPIONNET PARIS 75018 FRANCE	0.00	709.12	709.12	0.00	709.12 USD	No	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	14052	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	709.12	709.12 USD	No	
28	180	No	Grupo Aeroméxico, S.A.B. de C.V.	CUSSON, JULIE 4381A RIVARD ST MONTREAL QC H2J 2N1 CANADA	536.07	0.00	0.00	0.00	536.07 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/22/2020									
	<b>Modified Claim:</b>	180	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	536.07	536.07 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
29	20146	No	Grupo Aeroméxico, S.A.B. de C.V.	DE VALE, WENDY ZARAGOZA 28 GUILFORD ROAD LEICESTER, LE LE2 2RB UNITED KINGDOM	1,812.32	0.00	0.00	0.00	1,812.32 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/25/2020									
	<b>Modified Claim:</b>	20146	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,812.32	1,812.32 USD	No	
30	218	No	Grupo Aeroméxico, S.A.B. de C.V.	DICKSON, MARTHA 920 COLUMBIA, #61 MAGNOLIA AR 71753	0.00	0.00	1,300.00	0.00	1,300.00 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/4/2021									
	<b>Modified Claim:</b>	218	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,300.00	1,300.00 USD	Yes	
31	10438	No	Grupo Aeroméxico, S.A.B. de C.V.	DONG, JIAHUI JENNY 533 SUNNYMOUNT AVE SUNNYVALE CA 94087	0.00	0.00	320.95	0.00	320.95 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/13/2020									
	<b>Modified Claim:</b>	10438	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	320.95	320.95 USD	No	
32	667	No	Grupo Aeroméxico, S.A.B. de C.V.	ETHEL VELASQUEZ ROMERO & JESUS ROMERO CAMPOS 16066 GAMBLE AVE RIVERSIDE CA 92508	0.00	525.60	0.00	0.00	525.60 USD	No	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/19/2021									
	<b>Modified Claim:</b>	667	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	525.60	525.60 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
33	10562	No	Grupo Aeroméxico, S.A.B. de C.V.	FAVE, BERNARD 23 RUE DE LA FORGE ROYALE PARIS, 75011 FRANCE	0.00	714.60	714.60	0.00	714.60 USD	No	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b>	12/19/2020										
<b>Modified Claim:</b>	10562	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	714.60	714.60 USD	No	
34	10434	No	Grupo Aeroméxico, S.A.B. de C.V.	FELLMETH, AARON 8218 N 13TH AVE PHOENIX AZ 85021	0.00	0.00	241.90	0.00	241.90 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	12/13/2020										
<b>Modified Claim:</b>	10434	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	241.90	241.90 USD	No	
35	20371	No	Grupo Aeroméxico, S.A.B. de C.V.	FERRER, CARLA MARIN C/ ROGER DE FLOR, 193 - 195 PISO 4 PUERTA 4 BARCELONA 08013 SPAIN	1,139.52	0.00	0.00	0.00	1,139.52 USD	No	Insufficient documentation to support secured claim
<b>Date Filed:</b>	1/14/2021										
<b>Modified Claim:</b>	20371	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,139.52	1,139.52 USD	No	
36	20352	No	Grupo Aeroméxico, S.A.B. de C.V.	FIRST NATIONAL TRAVEL 2730 N BERKELEY LAKE RD, B1300 DULUTH GA 30096	4,716.67	0.00	0.00	0.00	4,716.67 USD	No	Insufficient documentation to support secured and priority claim
<b>Date Filed:</b>	1/14/2021										
<b>Modified Claim:</b>	20352	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	4,716.67	4,716.67 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
37	11041	No	Grupo Aeroméxico, S.A.B. de C.V.	FLEENOR, BAXTER RAY 5769 NEW CHAPEL RD SPRINGFIELD TN 37172	0.00	2,000.00	2,000.00	0.00	2,000.00 USD	Yes	Insufficient documentation to support secured and priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b> 12/29/2020											
<b>Modified Claim:</b>	11041	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	2,000.00	2,000.00 USD	Yes	
38	11654	No	Grupo Aeroméxico, S.A.B. de C.V.	GALVAO, URSULA RUA MADAME CURIE, 1350 BAIRRO DA CRUZ LORENA SP 12606330 BRAZIL	0.00	0.00	2,701.77	0.00	2,701.77 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b> 1/4/2021											
<b>Modified Claim:</b>	11654	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	2,701.77	2,701.77 USD	No	
39	10466	No	Grupo Aeroméxico, S.A.B. de C.V.	GARCIA, GABRIEL MARTINEZ CALLE TREINTA 85 COLONIA MARAVILLAS NEZAHUALCOYOTL, MX 57410 MEXICO	7,472.00	0.00	0.00	0.00	7,472.00 MXN	No	Insufficient documentation to support secured claim
<b>Date Filed:</b> 12/15/2020											
<b>Modified Claim:</b>	10466	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	323.61	323.61 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
40	20095	No	Grupo Aeroméxico, S.A.B. de C.V.	GARCIA, SARA FERNANDEZ YELMO DE MAMBRINO, 7 PORTAL 5 2ºB GETAFE, ES 28906 SPAIN	1,600.00	1,600.00	0.00	0.00	1,600.00 USD	Yes	Insufficient documentation to support secured claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b>	12/11/2020										
<b>Modified Claim:</b>	20095	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,600.00	1,600.00 USD	Yes	
41	10460	No	Grupo Aeroméxico, S.A.B. de C.V.	GARZA, HUMBERTO RODRIGUEZ DE LA 6914 ELM TRACE DR SUGAR LAND TX 77479	0.00	0.00	15,549.00	0.00	15,549.00 MXN	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	12/14/2020										
<b>Modified Claim:</b>	10460	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	673.43	673.43 USD	No	
42	220	No	Grupo Aeroméxico, S.A.B. de C.V.	GIGANTE, MICHELLE 435 BIRD AVE BUFFALO NY 14213	606.83	0.00	0.00	0.00	606.83 USD	No	Insufficient documentation to support secured claim
<b>Date Filed:</b>	1/4/2021										
<b>Modified Claim:</b>	220	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	606.83	606.83 USD	No	
43	20317	No	Grupo Aeroméxico, S.A.B. de C.V.	GILABERT, FERNANDO BLANCO PASEO DEL URUMEA 13, 7ºF SAN SEBASTIAN 20014 SPAIN	1,500.00	0.00	0.00	0.00	1,500.00 USD	No	Insufficient documentation to support secured claim
<b>Date Filed:</b>	1/14/2021										
<b>Modified Claim:</b>	20317	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,500.00	1,500.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
44	20526	No	Grupo Aeroméxico, S.A.B. de C.V.	GLOBALIA BUSINESS TRAVEL CARR DE LLUCMAJOR KM 21.5 S/N LLUCMAJOR ES 07620	853.78	0.00	0.00	0.00	853.78 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	2/24/2021									
	<b>Modified Claim:</b>	20526	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	853.78	853.78 USD	Yes	
45	14543	No	Grupo Aeroméxico, S.A.B. de C.V.	GODOY, MAYRA LUCERO SANDOVAL 1150 BROOKSIDE DR, APT 806 SAN PABLO CA 94806	0.00	231.00	0.00	0.00	231.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14543	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	231.00	231.00 USD	No	
46	20392	No	Grupo Aeroméxico, S.A.B. de C.V.	GOMEZ NAVARRO, ALBERTO CALLE FUENTES 65 A, BAJO GUAREÑA 06470 SPAIN	0.00	0.00	693.00	0.00	693.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	20392	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	693.00	693.00 USD	No	
47	14668	No	Grupo Aeroméxico, S.A.B. de C.V.	GONZALEZ, ELIAM RAQUEL 2308 CROCKER LN MODESTO CA 95358	0.00	0.00	3,000.00	0.00	3,000.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14668	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,000.00	3,000.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
48	20143	No	Grupo Aeroméxico, S.A.B. de C.V.	GONZALEZ, ESTEFANIA SABAN GENERAL PAZ 52 TIMBRE 1 GODOY CRUZ, ME 5501 ARGENTINA	555.00	0.00	0.00	0.00	555.00 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/24/2020									
	<b>Modified Claim:</b>	20143	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	555.00	555.00 USD	Yes	
49	13649	No	Grupo Aeroméxico, S.A.B. de C.V.	GONZALEZ, HECTOR G 3504 SAINT AIDEN ST LAS VEGAS NV 89129	1,312.89	1,312.89	1,312.89	1,312.89	1,312.89 USD	Yes	Insufficient documentation to support secured and priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	13649	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,312.89	1,312.89 USD	Yes	
50	14666	No	Grupo Aeroméxico, S.A.B. de C.V.	GONZALEZ, ILEEN 2308 CROCKER LN MODESTO CA 95358	0.00	0.00	3,000.00	0.00	3,000.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14666	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,000.00	3,000.00 USD	No	
51	14661	No	Grupo Aeroméxico, S.A.B. de C.V.	GONZALEZ, JUAN MARTIN 2308 CROCKER LN MODESTO CA 95358	0.00	0.00	3,000.00	0.00	3,000.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14661	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,000.00	3,000.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
52	14650	No	Grupo Aeroméxico, S.A.B. de C.V.	GONZALEZ, MARLENE 2308 CROCKER LN MODESTO CA 95358	0.00	0.00	3,000.00	0.00	3,000.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14650	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,000.00	3,000.00 USD	No	
53	13258	No	Grupo Aeroméxico, S.A.B. de C.V.	GUIRAUD, MAGALI 21 COURS DE LA REPUBLIQUE CASTELNAUDARY 11400 FRANCE	646.17	0.00	646.17	0.00	646.17 USD	No	Insufficient documentation to support secured and priority claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	13258	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	646.17	646.17 USD	No	
54	20240	No	Grupo Aeroméxico, S.A.B. de C.V.	GUTIÉRREZ, VIRGINIA EDITH RODRIGUEZ ALEEA CALINESTI #20 BL. C12, SC 3, AP.33 SECTOR 4 BUCAREST 040975 ROMANIA	639.96	639.96	0.00	0.00	639.96 USD	No	Insufficient documentation to support secured claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/12/2021									
	<b>Modified Claim:</b>	20240	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	639.96	639.96 USD	No	
55	14757	No	Grupo Aeroméxico, S.A.B. de C.V.	HA, SANG JIN 1525 13TH ST FORT LEE NJ 07024	0.00	0.00	2,250.00	0.00	2,250.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/30/2021									
	<b>Modified Claim:</b>	14757	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,250.00	2,250.00 USD	No	



**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
56	20455	No	Grupo Aeroméxico, S.A.B. de C.V.	HANONO, REGINA APPO BOSQUE DE RIO FRIO #84 LA HERRADURA HUIXQUILUCAN 52784 MÉXICO	42,422.00	0.00	0.00	0.00	42,422.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20455	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,837.30	1,837.30 USD	No	
57	10616	No	Grupo Aeroméxico, S.A.B. de C.V.	HANSEN, MARK JORDAN 370 MOCLIFF RD EPHRATA WA 98823	0.00	0.00	1,651.16	0.00	1,651.16 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/22/2020									
	<b>Modified Claim:</b>	10616	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,651.16	1,651.16 USD	No	
58	10337	No	Grupo Aeroméxico, S.A.B. de C.V.	HAYDON, EMMA 301 - 77 LOMBARD ST TORONTO ON M5C 3E1 CANADA	0.00	0.00	822.22	0.00	822.22 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/9/2020									
	<b>Modified Claim:</b>	10337	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	822.22	822.22 USD	No	
59	20256	No	Grupo Aeroméxico, S.A.B. de C.V.	HERNANDEZ, MARGARITA 3738 W 157TH ST MARKHAM IL 60428	0.00	791.54	0.00	0.00	791.54 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/12/2021									
	<b>Modified Claim:</b>	20256	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	791.54	791.54 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
60	10426	No	Grupo Aeroméxico, S.A.B. de C.V.	HERNANDEZ, ORLANDO D 303 BLUE SPRUCE CT LAKE VILLA IL 60046	0.00	0.00	3,645.12	0.00	3,645.12 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/13/2020									
	<b>Modified Claim:</b>	10426	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,645.12	3,645.12 USD	No	
61	20289	No	Grupo Aeroméxico, S.A.B. de C.V.	HERNANDEZ, TERESA MORA CALLE MAYOR, 18, 1ºB DERECHA C/ SAN VICENTE FERRER, 19, 2ºD, MADRID AZUQUECA DE HENARES 19200 SPAIN	871.99	0.00	0.00	0.00	871.99 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	20289	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	871.99	871.99 USD	Yes	
62	10516	No	Grupo Aeroméxico, S.A.B. de C.V.	HOJIN, KIM 204&205, 14, BUHEUNG-RO MOKPO-SI, JN 58694 REPUBLIC OF KOREA	0.00	0.00	2,063.07	0.00	2,063.07 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/17/2020									
	<b>Modified Claim:</b>	10516	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,063.07	2,063.07 USD	Yes	
63	14411	No	Grupo Aeroméxico, S.A.B. de C.V.	HORIBE, DAISUKE 301-3-18-8 KINUTA SETAGAYA-KU TOKYO 1570073 JAPAN	0.00	20.00	3,000.00	0.00	3,020.00 USD	No	Insufficient documentation to support secured and priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14411	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,020.00	3,020.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
64	20334	No	Grupo Aeroméxico, S.A.B. de C.V.	IGLESIAS, MIREYA ESTEVEZ PASEO STA MARIA DE LA CABEZA 47 3D MADRID ES 28045 SPAIN	507.02	0.00	0.00	0.00	507.02 USD	Yes	Insufficient documentation to support secured and priority claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	20334	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	507.02	507.02 USD	Yes	
65	14406	No	Grupo Aeroméxico, S.A.B. de C.V.	INTERGSA AV DES CELTES, 7 - KELTENLAAN 7 BRUSSELS 1040 BEIGIUM	0.00	2,261.00	0.00	0.00	2,261.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14406	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,261.00	2,261.00 USD	No	
66	20423	No	Grupo Aeroméxico, S.A.B. de C.V.	INTERGSA AV DES CELTES, 7 - KELTENLAAN 7 BRUSELAS 1040 BELGIUM	2,261.00	2,261.00	0.00	0.00	2,261.00 USD	Yes	Insufficient documentation to support secured claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20423	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,261.00	2,261.00 USD	Yes	
67	12743	No	Grupo Aeroméxico, S.A.B. de C.V.	JANCARTHIER VOYAGES FRENCH TRAVEL AGENCY 33 RUE VICTOR HUGO LYON 69002 FRANCE	0.00	0.00	1,032.47	0.00	1,032.47 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	12743	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,032.47	1,032.47 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
68	13354	No	Grupo Aeroméxico, S.A.B. de C.V.	JONGWAN KIM AND SEONJU CHO 104-1511, 34, SANHYEON-RO, ILSANSEO-GU GOYANG-SI GYEONGGI-DO 10348 SOUTH KOREA	6,107.57	0.00	0.00	0.00	6,107.57 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	13354	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	6,107.57	6,107.57 USD	No	
69	13386	No	Grupo Aeroméxico, S.A.B. de C.V.	JUBB IV, ELMER CHARLES PO BOX 170458 BROOKLYN NY 11217	0.00	0.00	259.86	0.00	259.86 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	13386	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	259.86	259.86 USD	No	
70	20182	No	Grupo Aeroméxico, S.A.B. de C.V.	JULIAN, GENARO DECRESCENZO PRIVADA MAR IBERICO 964 SAN AGUSTIN CAMPESTRE SAN PEDRO GARZA GARCIA NL 66270 MEXICO	418.58	0.00	0.00	0.00	418.58 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/5/2021									
	<b>Modified Claim:</b>	20182	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	418.58	418.58 USD	No	
71	12002	No	Grupo Aeroméxico, S.A.B. de C.V.	JUN, ISHIBASHI 209 GROSVENOR HOUSE 3-18-19 MOTOYOKOYAMACHO HACHIOJI CITY, TOKYO 1920063 JAPAN	1,116.83	0.00	0.00	0.00	1,116.83 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/7/2021									
	<b>Modified Claim:</b>	12002	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,116.83	1,116.83 USD	Yes	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
72	13532	No	Grupo Aeroméxico, S.A.B. de C.V.	KAMATA, NORIHIKO 702, 18-6 TSUKUNO-CHO, TSURUMI-KU YOKOHAMA KANAGAWA 230 0061 JAPAN	0.00	0.00	8,336.56	0.00	8,336.56 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	13532	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	8,336.56	8,336.56 USD	No	
73	159	No	Grupo Aeroméxico, S.A.B. de C.V.	KAPLAN, SEWELLYN 812 POMONA AVENUE EL CERRITO CA 94530	0.00	0.00	1,534.00	0.00	1,534.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/17/2020									
	<b>Modified Claim:</b>	159	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,534.00	1,534.00 USD	No	
74	262	No	Grupo Aeroméxico, S.A.B. de C.V.	KASHIWAGI, YAMATO 2-36-7 TAKAISHI ASHO-KU KAWASAKI-CITY KANAGAWA 215-0003 JAPAN	1,950.00	0.00	0.00	0.00	1,950.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	262	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,950.00	1,950.00 USD	No	
75	14068	No	Grupo Aeroméxico, S.A.B. de C.V.	KERBY, DEBRA DEEN 102 - 149 SOUTH DRIVE TORONTO ON M4W 1S3 CANADA	0.00	0.00	1,401.00	0.00	1,401.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	14068	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,401.00	1,401.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
76	14336	No	Grupo Aeroméxico, S.A.B. de C.V.	KIM, TAESEOB BUK-GU GUNWANG-RO 105BUN GIL 43-1 203HO GWANGJU 61162 REPUBLIC OF KOREA	0.00	0.00	6,656.03	0.00	6,656.03 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	1/15/2021										
<b>Modified Claim:</b>	14336	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	6,656.03	6,656.03 USD	No	
77	11330	No	Grupo Aeroméxico, S.A.B. de C.V.	KIRKALDY, NIALL FLAT 2, 13 RAEBURN STREET LONDON SW2 5QT UNITED KINGDOM	0.00	0.00	1,190.88	0.00	1,190.88 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	1/2/2021										
<b>Modified Claim:</b>	11330	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,190.88	1,190.88 USD	No	
78	14657	No	Grupo Aeroméxico, S.A.B. de C.V.	L A, A MINOR, PARENT RAYMOND AMANQUAH 6151 BUENA VISTA AVE OAKLAND CA 94618	0.00	0.00	1,768.69	0.00	1,768.69 USD	Yes	Insufficient documentation to support priority claim
<b>Date Filed:</b>	1/15/2021										
<b>Modified Claim:</b>	14657	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,768.69	1,768.69 USD	Yes	
79	10456	No	Grupo Aeroméxico, S.A.B. de C.V.	LAMAS, CAROLINA PEREZ JR LOS LANCEROS CDRA 5 UR NEPTUNO SURCO LIMA 51 PERU	0.00	362.50	0.00	0.00	362.50 USD	Yes	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b>	12/14/2020										
<b>Modified Claim:</b>	10456	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	362.50	362.50 USD	Yes	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
80	20235	No	Grupo Aeroméxico, S.A.B. de C.V.	LARIOS, PABLO JOSE GUATEMALA ZONA 15 EDIFICIO ORLEANS GUATEMALA 01015 GUATEMALA	443.30	0.00	0.00	0.00	443.30 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/12/2021									
	<b>Modified Claim:</b>	20235	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	443.30	443.30 USD	Yes	
81	13433	No	Grupo Aeroméxico, S.A.B. de C.V.	LAVERTU, FRANCOISE 1319 CRES REDPATH MONTREAL QB H3G 1A1 CANADA	0.00	0.00	3,025.00	253.00	3,278.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	13433	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,278.00	3,278.00 USD	No	
82	12317	No	Grupo Aeroméxico, S.A.B. de C.V.	LEE, AHREUM OSONGSAENGYUNG3RO 87, 502-804 HEUNGDUK-GU CHEONGJU-SI 28165 REPUBLIC OF KOREA	0.00	0.00	1,004.20	0.00	1,004.20 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/9/2021									
	<b>Modified Claim:</b>	12317	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,004.20	1,004.20 USD	No	
83	12318	No	Grupo Aeroméxico, S.A.B. de C.V.	LEE, AHREUM OSONGSAENGYUNG3RO 87, 502-804 HEUNGDUK-GU CHEONGJU 28165 SOUTH KOREA	0.00	0.00	1,004.20	0.00	1,004.20 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/9/2021									
	<b>Modified Claim:</b>	12318	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,004.20	1,004.20 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
84	10531	No	Grupo Aeroméxico, S.A.B. de C.V.	LIM, NAMHOON 40, CHEONGNEUNG-DAERO 410BEON-GIL NAMDONG-GU INCHEON, 21691 SOUTH KOREA	0.00	857.00	857.00	0.00	857.00 USD	Yes	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b>	12/17/2020										
<b>Modified Claim:</b>	10531	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	857.00	857.00 USD	Yes	
85	13428	No	Grupo Aeroméxico, S.A.B. de C.V.	LINDNER, STEVEN R 7 22 MANNHEIM, 68161 GERMANY	0.00	0.00	460.00	0.00	82.00 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	1/13/2021										
<b>Modified Claim:</b>	13428	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	82.00	82.00 USD	No	
86	20522	No	Grupo Aeroméxico, S.A.B. de C.V.	MALDONADO, NATY CAENSTRAAT, 624 7002GW DOETINCHEM 7002GW PAISES BAJOS	1,091.00	0.00	0.00	0.00	1,091.00 USD	No	Insufficient documentation to support secured claim
<b>Date Filed:</b>	2/19/2021										
<b>Modified Claim:</b>	20522	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,091.00	1,091.00 USD	No	
87	10908	No	Grupo Aeroméxico, S.A.B. de C.V.	MANSDORF, PAUL 1569 SOLANO AVE, #703 BERKELEY CA 94707	0.00	0.00	1,780.00	0.00	1,780.00 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>	12/28/2020										
<b>Modified Claim:</b>	10908	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,780.00	1,780.00 USD	No	



**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
88	216	No	Grupo Aeroméxico, S.A.B. de C.V.	MARCHESI, WENDI SUE LOOK 1465 WASHINGTON ST, #4 SAN FRANCISCO CA 94109-3947	401.87	0.00	0.00	0.00	401.87 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/4/2021									
	<b>Modified Claim:</b>	216	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	401.87	401.87 USD	No	
89	20412	No	Grupo Aeroméxico, S.A.B. de C.V.	MARTINEZ, EDUARDO INIGO BOULEVARD MONT DE MARCAN 4ºA. TUDELA TUDELA DE NAVARRA 31500 SPAIN	846.62	0.00	0.00	0.00	846.62 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20412	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	846.62	846.62 USD	No	
90	161	No	Grupo Aeroméxico, S.A.B. de C.V.	MASKIN, MICHAEL BRUCE 1780 AVENIDA DEL MUNDO, UNIT 903 CORONADO CA 92118-3049	0.00	0.00	680.18	0.00	680.18 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/17/2020									
	<b>Modified Claim:</b>	161	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	680.18	680.18 USD	No	
91	13916	No	Grupo Aeroméxico, S.A.B. de C.V.	MAVSHOVA, OLGA UL SAMUILLA MARSHAKA 19 FL 127 MOSCOW 108850 RUSSIA	0.00	830.00	0.00	0.00	830.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	13916	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	830.00	830.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
92	14204	No	Grupo Aeroméxico, S.A.B. de C.V.	MEGEVAND, MARGAUX 2339 CALIFORNIA ST, UNIT 2 SAN FRANCISCO CA 94115	0.00	633.58	0.00	0.00	633.58 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b>		1/14/2021									
<b>Modified Claim:</b>		No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	633.58	633.58 USD	No	
93	14728	No	Grupo Aeroméxico, S.A.B. de C.V.	MISSIONARY VENTURES INTERNATIONAL 1017 MAITLAND CENTER COMMONS BLVD MAITLAND FL 32751	0.00	1,960.96	0.00	0.00	1,960.96 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b>		1/21/2021									
<b>Modified Claim:</b>		No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,960.96	1,960.96 USD	No	
94	11623	No	Grupo Aeroméxico, S.A.B. de C.V.	MKHITARIAN, TERESA 14414 ADDISON ST, UNIT 12 SHERMAN OAKS CA 91423	0.00	0.00	828.49	0.00	828.49 USD	No	Insufficient documentation to support priority claim
<b>Date Filed:</b>		1/4/2021									
<b>Modified Claim:</b>		No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	828.49	828.49 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
95	20484	No	Grupo Aeroméxico, S.A.B. de C.V.	MONROY, ALEJANDRA MARCELA MAGANA 131 PASAJE 6 NORTE BLOCK A ANTIGUO CUSCATLAN 1511 EL SALVADOR	0.00	361.72	361.72	0.00	361.72 USD	Yes	Insufficient documentation to support secured and priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b> 1/15/2021											
<b>Modified Claim:</b>	20484	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	361.72	361.72 USD	Yes	
96	678	No	Grupo Aeroméxico, S.A.B. de C.V.	MONSON, CARLOS ALBERTO 188 RAMALHO ORTIGAO AV VILA GUMERCINDO SAN PAULO 04130-0J0 BRAZIL	1,094.90	0.00	0.00	0.00	1,094.90 USD	No	Insufficient documentation to support secured claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
<b>Date Filed:</b> 1/25/2021											
<b>Modified Claim:</b>	678	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,094.90	1,094.90 USD	No	
97	20087	No	Grupo Aeroméxico, S.A.B. de C.V.	MORALES, FREDDY RAUL SANCHEZ SAN JUAN DE TIBAS 75M NORTE DE PALI COLIMA DE TIBAS SAN JOSÉ, 11301 COSTA RICA	2,385.33	0.00	0.00	0.00	2,385.33 USD	No	Insufficient documentation to support secured claim
<b>Date Filed:</b> 12/9/2020											
<b>Modified Claim:</b>	20087	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	2,385.33	2,385.33 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
98	20144	No	Grupo Aeroméxico, S.A.B. de C.V.	MUÑOZ, MARIA RAQUEL CUADRA SAN CARLOS 205 FRACCIONAMIENTO SAN JORGE LEON, GT 37289 MEXICO	55,664.00	0.00	0.00	0.00	55,664.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/24/2020									
	<b>Modified Claim:</b>	20144	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,410.81	2,410.81 USD	No	
99	10563	No	Grupo Aeroméxico, S.A.B. de C.V.	NAGY, ANDRE RODRIGUES RUA ANTONIO ETZEL 37 SAO PAULO, SP 04012-00 BRAZIL	617.25	0.00	0.00	0.00	617.25 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/19/2020									
	<b>Modified Claim:</b>	10563	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	617.25	617.25 USD	No	
100	11169	No	Grupo Aeroméxico, S.A.B. de C.V.	NAKAMURA, CHIHARU 138 CHARLTON BLVD NORTH YORK ON M2R 2J1 CANADA	614.92	0.00	0.00	0.00	614.92 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/30/2020									
	<b>Modified Claim:</b>	11169	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	614.92	614.92 USD	No	
101	293	No	Grupo Aeroméxico, S.A.B. de C.V.	ORTIZ, LETIZIA VICTORIA 1309 MAGNOLIA AVE ELKHART IN 46514	0.00	0.00	2,924.30	0.00	2,924.30 USD	No	Insufficient documentation to support secured and priority claim.
	<b>Date Filed:</b>	1/4/2021									
	<b>Modified Claim:</b>	293	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,924.30	2,924.30 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
102	12610	No	Grupo Aeroméxico, S.A.B. de C.V.	PARK, KWON CHUL NO 302, 48-11 JIJOK-RO 349 BEON-GIL YUSEONG-GU DAEJEON 34071 REPUBLIC OF KOREA	2,000.00	0.00	2,000.00	0.00	2,000.00 USD	No	Insufficient documentation to support secured and priority claim.
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	12610	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,000.00	2,000.00 USD	No	
103	10525	No	Grupo Aeroméxico, S.A.B. de C.V.	PARK, YOUNG HWAN 2335-102, SANGDONG-RO 117BEON-GIL 64 BUCHON-SI, GYEONGGI-DO, 14540 KOREA	0.00	1,618.00	0.00	0.00	1,618.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	12/17/2020									
	<b>Modified Claim:</b>	10525	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,618.00	1,618.00 USD	No	
104	312	No	Grupo Aeroméxico, S.A.B. de C.V.	PEREZ, CECILIA DELGADO AZABUJUBAN 2-8-6-905 MINATO-KU TOKYO 106-0045 JAPAN	0.00	0.00	1,705.60	0.00	1,705.60 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	312	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,705.60	1,705.60 USD	No	
105	20494	No	Grupo Aeroméxico, S.A.B. de C.V.	PEREZ, LAURA ELENA SAUCEO RICARDO PEART 187 EL BALUARTE SALTILLO CZ 25297 MEXICO	0.00	134,000.00	0.00	0.00	134,000.00 Unknown	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/20/2021									
	<b>Modified Claim:</b>	20494	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	134,000.00	134,000.00 Unknown	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
106	20183	No	Grupo Aeroméxico, S.A.B. de C.V.	PHILLIPS, CESAR EUGENIO SANCHEZ C/O JUAN SANCHEZ AZCONA 552 COL NARVARTE ALCALDIA BENITO JUAREZ CIUDAD DE MEXICO 03020 MEXICO	0.00	12,978.00	0.00	0.00	12,978.00 MXN	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/5/2021									
	<b>Modified Claim:</b>	20183	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	562.08	562.08 USD	No	
107	14023	No	Grupo Aeroméxico, S.A.B. de C.V.	PLANET ONE TRAVEL 2323 S VOSS RD, STE 465 HOUSTON TX 77057	0.00	0.00	3,024.00	0.00	3,024.00 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	14023	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,024.00	3,024.00 USD	Yes	
108	20319	No	Grupo Aeroméxico, S.A.B. de C.V.	QUIJANO, MERCEDES HIGASHI NARASHINO 5-30-4-109 NARASHINO CH 275-0001 JAPAN	1,300.00	0.00	0.00	0.00	1,300.00 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	20319	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,300.00	1,300.00 USD	Yes	
109	12649	No	Grupo Aeroméxico, S.A.B. de C.V.	RANFT, MARKUS KORNERSTRASSE 47 MUNSTER 48151 GERMANY	0.00	0.00	2,439.00	0.00	2,439.00 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	12649	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,439.00	2,439.00 USD	Yes	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
110	339	No	Grupo Aeroméxico, S.A.B. de C.V.	REYNA, ADOLFO MANCERA 4821 BLVD MARIANO ESCOBEDO PTE LOMAS DE LAS HILAMAS LEON, GUANAJUATO 37353 MEXICO	12,580.00	0.00	0.00	0.00	12,580.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	339	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	544.84	544.84 USD	No	
111	20410	No	Grupo Aeroméxico, S.A.B. de C.V.	RIBAS, JUAN VICENTE RAMON AVENIDA IGNACIO WALLIS 27 IBIZA ES 07800 SPAIN	664.93	0.00	0.00	664.93	1,329.86 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20410	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,329.86	1,329.86 USD	No	
112	20093	No	Grupo Aeroméxico, S.A.B. de C.V.	RIVAS, JOSE GIL AVENIDA DE BUEU 54 CANGAS DO MORRAZO, 36940 SPAIN	892.61	0.00	0.00	0.00	892.61 USD	Yes	Insufficient documentation to support secured and priority claim.
	<b>Date Filed:</b>	12/10/2020									
	<b>Modified Claim:</b>	20093	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	892.61	892.61 USD	Yes	
113	10507	No	Grupo Aeroméxico, S.A.B. de C.V.	RIVERA, ROBERT 1359 S WALNUT ST, UNIT 5130 ANAHEIM CA 92802	0.00	0.00	231.00	0.00	231.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/16/2020									
	<b>Modified Claim:</b>	10507	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	231.00	231.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
114	10538	No	Grupo Aeroméxico, S.A.B. de C.V.	ROARK, PATRICK AND KEREN 2005 W SHACKELTON DR PHOENIX AZ 85086	0.00	0.00	1,149.74	0.00	1,149.74 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/18/2020									
	<b>Modified Claim:</b>	10538	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,149.74	1,149.74 USD	No	
115	20206	No	Grupo Aeroméxico, S.A.B. de C.V.	ROJAS, SHELLAH HANEY ROJAS HIGASHI NAKAHARA 2-2-52 BERUHAIMU SHONAN 104 HIRATSUKA KG 254-0077 JAPAN	2,447.00	0.00	2,447.00	30.00	2,477.00 USD	Yes	Insufficient documentation to support secured and priority claim.
	<b>Date Filed:</b>	1/8/2021									
	<b>Modified Claim:</b>	20206	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,477.00	2,477.00 USD	Yes	
116	10389	No	Grupo Aeroméxico, S.A.B. de C.V.	ROTHSCHILD, CLAUDE MICHEL 13337 BEACH AVE, APT 107 MARINA DEL REY CA 90292	0.00	0.00	381.70	0.00	381.70 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/11/2020									
	<b>Modified Claim:</b>	10389	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	381.70	381.70 USD	No	
117	14653	No	Grupo Aeroméxico, S.A.B. de C.V.	S A, A MINOR CHILD, YANIRA WONG, PARENT 6151 BUENA VISTA AVE OAKLAND CA 94618	0.00	0.00	1,768.69	0.00	1,768.69 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14653	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,768.69	1,768.69 USD	Yes	



**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
118	20257	No	Grupo Aeroméxico, S.A.B. de C.V.	SAKAMOTO, MAI TOYOTAMAKITA4-15-7 GALAHILS NERIMA 106 TOKYOTO NERIMAKU 176-0012 JAPAN	1,521.91	0.00	0.00	0.00	1,521.91 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/13/2021									
	<b>Modified Claim:</b>	20257	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,521.91	1,521.91 USD	No	
119	20215	No	Grupo Aeroméxico, S.A.B. de C.V.	SAKURABA, MASAKO 2-9-14 HONCHO KOGANEI CITY TOKYO 184-0004 JAPAN	2,686.00	0.00	0.00	0.00	2,686.00 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/9/2021									
	<b>Modified Claim:</b>	20215	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,686.00	2,686.00 USD	No	
120	20102	No	Grupo Aeroméxico, S.A.B. de C.V.	SALAS, ERICK 1302 NEWKIRK AVENUE, APT 3K BROOKLYN NY 11230	508.71	0.00	0.00	0.00	508.71 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/12/2020									
	<b>Modified Claim:</b>	20102	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	508.71	508.71 USD	No	
121	306	No	Grupo Aeroméxico, S.A.B. de C.V.	SALGUERO, ALBA AMINTA 4431 UTAH DR RICHMOND CA 94803	0.00	0.00	472.48	0.00	472.48 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/8/2021									
	<b>Modified Claim:</b>	306	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	472.48	472.48 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
122	11959	No	Grupo Aeroméxico, S.A.B. de C.V.	SANCHEZ, BIANCA JANETH RAMIREZ JR CHACHAPOYAS 490 STA MARINA SUR CALLAO LIMA CA 07001 PERU	276.52	0.00	0.00	0.00	276.52 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/6/2021									
	<b>Modified Claim:</b>	11959	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	276.52	276.52 USD	Yes	
123	311	No	Grupo Aeroméxico, S.A.B. de C.V.	SANCHEZLAZARO, MARIA TERESA 8 NENUFAR ST BAJO DERECHA MADRID 28039 SPAIN	13,434.00	0.00	0.00	0.00	13,434.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	311	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	581.83	581.83 USD	No	
124	12216	No	Grupo Aeroméxico, S.A.B. de C.V.	SAWAI, SHINJI #803 3-7-11 IWAMOTOCHO CHIYODAKU TOKYO, 101-0032 JAPAN	0.00	1,200.00	0.00	0.00	1,200.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/8/2021									
	<b>Modified Claim:</b>	12216	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,200.00	1,200.00 USD	No	
125	14453	No	Grupo Aeroméxico, S.A.B. de C.V.	SCHAEFER, SUSAN E 17004 COUNTY RD 270 FLEMINGTON MO 65650	0.00	0.00	1,129.32	0.00	1,129.32 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14453	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,129.32	1,129.32 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
126	12055	No	Grupo Aeroméxico, S.A.B. de C.V.	SELECTOUR BLEU VOYAGES IATA 20224945 10 TER BD GAMBETTA GRENOBLE 38000 FRANCE	0.00	0.00	1,924.00	0.00	1,924.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/7/2021									
	<b>Modified Claim:</b>	12055	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,924.00	1,924.00 USD	No	
127	10450	No	Grupo Aeroméxico, S.A.B. de C.V.	SELECTOUR RICHARD FLECHON 111-113 RUE ERNEST DEPROGE FORT DE FRANCE 97200 MARTINIQUE	0.00	0.00	1,100.00	0.00	1,000.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/14/2020									
	<b>Modified Claim:</b>	10450	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,000.00	1,000.00 USD	No	
128	10348	No	Grupo Aeroméxico, S.A.B. de C.V.	SELECTOUR RICHARD FLECHON VOYAGES 111-113 RUE ERNEST DEPROGE FORT DE FRANCE, 97200 MARTINIQUE	0.00	0.00	3,000.00	0.00	2,720.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/10/2020									
	<b>Modified Claim:</b>	10348	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,720.00	2,720.00 USD	No	
129	14729	No	Grupo Aeroméxico, S.A.B. de C.V.	SEON, BOYEONG SOCHON-RO 86, 17 108-1110, GWANGSAN-GU GWANGJU METROPOLITAN CITY SOCHONRO 86, 17 108-1110 62387	0.00	0.00	900.00	0.00	900.00 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/21/2021									
	<b>Modified Claim:</b>	14729	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	900.00	900.00 USD	Yes	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
130	13658	No	Grupo Aeroméxico, S.A.B. de C.V.	SER, YOUNGBAE HALLA VIVALDI APT 102/402 NAMACK 2RO 22BEONGIL 10 MOCKPO 58681 SOUTH KOREA	4,034.00	0.00	0.00	0.00	4,034.00 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/14/2021									
	<b>Modified Claim:</b>	13658	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	4,034.00	4,034.00 USD	Yes	
131	14815	No	Grupo Aeroméxico, S.A.B. de C.V.	SOLOMON, SOFIA 219 LANCASTER AVE AUBURN AL 36830	0.00	0.00	461.40	0.00	461.40 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	3/11/2021									
	<b>Modified Claim:</b>	14815	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	461.40	461.40 USD	No	
132	20459	No	Grupo Aeroméxico, S.A.B. de C.V.	SUCHOWIECKY, SAMUEL 5135 BASCULE AVE WOODLAND HILLS CA 91364	0.00	0.00	10,308.00	0.00	10,308.00 MXN	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20459	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	446.44	446.44 USD	No	
133	20465	No	Grupo Aeroméxico, S.A.B. de C.V.	SUCHOWIECKY, SAMUEL 5135 BASCULE AVE WOODLAND HILLS CA 91364	0.00	0.00	54,000.00	0.00	54,000.00 Unknown	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20465	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	54,000.00	54,000.00 Unknown	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
134	20467	No	Grupo Aeroméxico, S.A.B. de C.V.	SUCHOWIECKY, SAMUEL 5135 BASCULE AVE WOODLAND HILLS CA 91364	0.00	0.00	599,887.00	0.00	599,887.00 Unknown	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	20467	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	599,887.00	599,887.00 Unknown	No	
135	12799	No	Grupo Aeroméxico, S.A.B. de C.V.	TDR TOURS' EXPRESSINC NIHONSIMEI GINZA BLDG 2-6-8 GINZA CHUO-KU TOKYO 104-0061 JAPAN	14,822.59	0.00	0.00	0.00	14,822.59 USD	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	12799	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	14,822.59	14,822.59 USD	No	
136	665	No	Grupo Aeroméxico, S.A.B. de C.V.	TOKUAMI, HITOMI 344 NISHISHINMEI-CHYO KAMIGYO-KU KYOTO 602-8169 JAPAN	2,823.83	2,823.83	2,823.83	2,823.83	2,823.83 USD	No	Insufficient documentation to support secured and priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	1/19/2021									
	<b>Modified Claim:</b>	665	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,823.83	2,823.83 USD	No	
137	302	No	Grupo Aeroméxico, S.A.B. de C.V.	TORRES, DORA PATRICIA LUNA 215 TLALOC COL NETZAHUALCOYOTL OAXACA 68140 MEXICO	15,352.00	0.00	0.00	0.00	15,352.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	1/7/2021									
	<b>Modified Claim:</b>	302	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	664.90	664.90 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
138	11830	No	Grupo Aeroméxico, S.A.B. de C.V.	TUCKER, KYLEY 6100 MATILIA AVE VALLEY GLEN CA 91401	0.00	0.00	828.49	0.00	828.49 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/5/2021									
	<b>Modified Claim:</b>	11830	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	828.49	828.49 USD	No	
139	14536	No	Grupo Aeroméxico, S.A.B. de C.V.	TYSDAL, CANDACE 4011 - 3F CALLE SONORA OESTE LAGUNA WOODS CA 92637	0.00	0.00	494.75	0.00	494.75 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14536	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	494.75	494.75 USD	No	
140	292	No	Grupo Aeroméxico, S.A.B. de C.V.	VALDEZ, RICARDO ALBERTO VEGA #58 CALLE GUACALCHIA LOMAS DE ALTAMIRA CONDOMINIO PLAZA APT 4 SAN SALVADOR EL SALVADOR	0.00	977.49	977.49	0.00	977.49 USD	No	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b>	12/31/2020									
	<b>Modified Claim:</b>	292	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	977.49	977.49 USD	No	
141	20100	No	Grupo Aeroméxico, S.A.B. de C.V.	VALENCIA, VANESSA ADRIANA PEREZ AVENIDA SAN JERONIMO 945 CIUDAD DE MEXICO 10200 MEXICO	37,868.00	0.00	0.00	0.00	37,868.00 MXN	No	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/11/2020									
	<b>Modified Claim:</b>	20100	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,640.07	1,640.07 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
142	20135	No	Grupo Aeroméxico, S.A.B. de C.V.	VICENTE RODERO RODERO C/ALBASANZ, 14 2ª PLANTA MADRID, 28037 ESPAÑA	2,885.47	0.00	0.00	0.40	2,885.87 USD	Yes	Insufficient documentation to support secured claim
	<b>Date Filed:</b>	12/22/2020									
	<b>Modified Claim:</b>	20135	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,885.87	2,885.87 USD	Yes	
143	11717	No	Grupo Aeroméxico, S.A.B. de C.V.	WATANABE, NORIKO 3-21-3 OOI SHINAGAWA TOKYO 1400014 JAPAN	2,560.00	0.00	2,560.00	0.00	2,560.00 USD	No	Insufficient documentation to support secured and priority claim.
	<b>Date Filed:</b>	1/5/2021									
	<b>Modified Claim:</b>	11717	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,560.00	2,560.00 USD	No	
144	10459	No	Grupo Aeroméxico, S.A.B. de C.V.	WINSTANLEY, COLE 23 MAGEE ST, APT 1 CAMBRIDGE MA 02139	0.00	0.00	1,728.00	0.00	1,728.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	12/14/2020									
	<b>Modified Claim:</b>	10459	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,728.00	1,728.00 USD	No	
145	14474	No	Grupo Aeroméxico, S.A.B. de C.V.	WITTE TRAVEL & TOURS 3250 28TH ST SE GRAND RAPIDS MI 49512	0.00	0.00	2,775.00	0.00	2,775.00 USD	No	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14474	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,775.00	2,775.00 USD	No	

**Wrong Debtor & Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
146	14652	No	Grupo Aeroméxico, S.A.B. de C.V.	WONG, YANIRA G 6151 BUENA VISTA AVE OAKLAND CA 94618	0.00	0.00	1,768.69	0.00	1,768.69 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/15/2021									
	<b>Modified Claim:</b>	14652	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,768.69	1,768.69 USD	Yes	
147	20169	No	Grupo Aeroméxico, S.A.B. de C.V.	YAMAMOTO, MAKIKO CALLE ALMENDROS LOTE 10 MZ 121 SM 313 COLONIA ALAMOS 2 BENITO JUAREZ, QUINTANA ROO CANCUN QR 77500 MEXICO	1,043.11	0.00	200.00	0.00	1,043.11 USD	No	Insufficient documentation to support secured and priority claim.
	<b>Date Filed:</b>	1/4/2021									
	<b>Modified Claim:</b>	20169	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,043.11	1,043.11 USD	No	
148	12596	No	Grupo Aeroméxico, S.A.B. de C.V.	YU, EUNHUI 36, JUNGmun-RO 81BEON-GIL # 304 SEOGWIPO-SI, JEJU ISLAND 63545 SOUTH KOREA	0.00	0.00	400.00	0.00	400.00 USD	Yes	Insufficient documentation to support priority claim
	<b>Date Filed:</b>	1/11/2021									
	<b>Modified Claim:</b>	12596	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	400.00	400.00 USD	Yes	

<b>Wrong Debtor and Incorrectly Classified Claim Totals</b>	<b>Count:</b>	<b>MXN</b>	<b>12</b>	<b>257,181.00</b>	<b>12,978.00</b>	<b>56,033.00</b>	<b>0.00</b>	<b>326,192.00</b>
		<b>USD</b>	<b>133</b>	<b>108,337.63</b>	<b>26,663.52</b>	<b>126,539.50</b>	<b>5,793.39</b>	<b>233,157.14</b>
		<b>Unknown</b>	<b>3</b>	<b>0.00</b>	<b>134,000</b>	<b>653,887.00</b>	<b>0.00</b>	<b>787,887.00</b>



**Schedule 5 to Proposed Order**

**Wrong Debtor and Foreign Currency Claims**

**Wrong Debtor & Foreign Currency Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	14884	No	Grupo Aeroméxico, S.A.B. de C.V.	OFFENBACHER, DANIELLE 100 WESTERN BATTERY RD, UNIT 402 TORONTO ON M6K 3S2 CANADA	0.00	0.00	0.00	1,438.38	1,438.38 CAD	No
	<b>Date Filed:</b>	1/15/2021								
	<b>Modified Claim:</b>	14884	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	1,044.54	1,044.54 USD	No
2	20483	No	Grupo Aeroméxico, S.A.B. de C.V.	RUSSO, MARCO CALLE FERNANDO GABRIEL 2 3B MADRID M 28017 SPAIN	0.00	0.00	0.00	2,389.28	2,389.28 EUR	No
	<b>Date Filed:</b>	1/15/2021								
	<b>Modified Claim:</b>	20483	No	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	2,678.14	2,678.14 USD	No

<b>Wrong Debtor and Foreign Currency Claim Totals</b>	<b>Count:</b>	<b>CAD</b>	<b>1</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,438.38</b>	<b>1,438.38</b>
		<b>EUR</b>	<b>1</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2,389.28</b>	<b>2,389.28</b>

**Schedule 6 to Proposed Order**

**Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims**

**Wrong Debtor, Incorrectly Classified & Foreign Currency Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	20331	No	Grupo Aeroméxico, S.A.B. de C.V.	ALESINA, SARA CALLE CALDERON DE LA BARCA N° 80 INT 3 BADALONA 08914 SPAIN	0.00	50.93	0.00	307.70	358.63 EUR	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b> 1/14/2021										
	<b>Modified Claim</b> 20331		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	401.99	401.99 USD		
2	12557	No	Grupo Aeroméxico, S.A.B. de C.V.	BARRIOS, SUSANA ABIGAIL MARTINEZ 4766 KNIGHT ST VANCOUVER BC V5N 3N2 CANADA	0.00	595.28	595.28	0.00	595.28 CAD	No	Insufficient documentation to support priority claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b> 1/10/2021										
	<b>Modified Claim</b> 12557		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	432.29	432.29 USD		
3	20309	No	Grupo Aeroméxico, S.A.B. de C.V.	BRIOSO, JOSE MARTIN CALLE CONCJA ESPINA N 3 4 PISO LEON 24007 SPAIN	326.69	0.00	0.00	0.00	326.69 EUR	Yes	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/14/2021										
	<b>Modified Claim</b> 20309		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	366.19	366.19 USD		
4	20380	No	Grupo Aeroméxico, S.A.B. de C.V.	ECHEANDIA, NÉSTOR SANCHEZ CALLE LOS PINILLAS, 25 4A MADRID 28032 SPAIN	1,237.32	0.00	0.00	0.00	1,237.32 EUR	No	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/14/2021										
	<b>Modified Claim</b> 20380		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,386.91	1,386.91 USD		

**Wrong Debtor, Incorrectly Classified & Foreign Currency Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
5	13837	No	Grupo Aeroméxico, S.A.B. de C.V.	GAY MUNAR, TERESA CALLE JUAN CRESPI 40 PALMA DE MALLORCA ES 07014 SPAIN	0.00	0.00	626.20	0.00	626.20 EUR	Yes	Insufficient documentation to support priority claim.
	<b>Date Filed:</b> 1/14/2021										
	<b>Modified Claim</b> 13837		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	701.91	701.91 USD		
6	20238	No	Grupo Aeroméxico, S.A.B. de C.V.	GIL, ANDREA RODRIGUEZ CALLE TUMACO 6, 2ºA MADRID 28027 SPAIN	918.17	0.00	0.00	0.00	918.17 EUR	Yes	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/12/2021										
	<b>Modified Claim</b> 20238		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,029.18	1,029.18 USD		
7	20237	No	Grupo Aeroméxico, S.A.B. de C.V.	GIL, MARCOS RODRIGUEZ CALLE TUMACO 6, 2ºA MADRID 28027 SPAIN	918.17	0.00	0.00	0.00	918.17 EUR	Yes	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/12/2021										
	<b>Modified Claim</b> 20237		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,029.18	1,029.18 USD		
8	12654	No	Grupo Aeroméxico, S.A.B. de C.V.	HURTIGRUTEN GMBH GROBE BLEICHEN 23 HAMBURG 20345 GERMANY	0.00	7,161.44	0.00	0.00	7,161.44 EUR	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b> 1/11/2021										
	<b>Modified Claim</b> 12654		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	8,027.26	8,027.26 USD		

**Wrong Debtor, Incorrectly Classified & Foreign Currency Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
9	10367	No	Grupo Aeroméxico, S.A.B. de C.V.	LIM, KYUBEOM DONGSHMUNRO 25GAGIL 20 SEONGBUKGU SEOUL, 02829 SOUTH KOREA	436,000.00	0.00	0.00	0.00	436,000.00 KRW	No	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 12/10/2020										
	<b>Modified Claim</b> 10367		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	362.97	362.97 USD		
10	20241	No	Grupo Aeroméxico, S.A.B. de C.V.	PADIN RAMOS, ANA CALLEJON DE LA IGLESIA, 1, 1B MADRID 28860 SPAIN	918.17	0.00	0.00	0.00	918.17 EUR	Yes	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/12/2021										
	<b>Modified Claim</b> 20241		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,029.18	1,029.18 USD		
11	12164	No	Grupo Aeroméxico, S.A.B. de C.V.	PETRUS, IANA 2103-80 PLAZA DRIVE WINNIPEG MB R3T 5S2 CANADA	0.00	0.00	971.56	0.00	971.56 CAD	No	Insufficient documentation to support priority claim.
	<b>Date Filed:</b> 1/8/2021										
	<b>Modified Claim</b> 12164		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	705.54	705.54 USD		
12	20175	No	Grupo Aeroméxico, S.A.B. de C.V.	TAMARGO, ANA ISABEL CALLE DE BRETON DE LOS HERREROS, 7 6D MADRID 28003 SPAIN	0.00	610.22	0.00	0.00	610.22 EUR	Yes	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b> 1/5/2021										
	<b>Modified Claim</b> 20175		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	684.00	684.00 USD		

**Wrong Debtor, Incorrectly Classified and Foreign Currency Claim Totals**

<b>Count:</b>	<b>CAD</b>	<b>2</b>	<b>0.00</b>	<b>595.28</b>	<b>1,566.84</b>	<b>0.00</b>	<b>1,566.84</b>
	<b>EUR</b>	<b>9</b>	<b>4,318.52</b>	<b>7,822.59</b>	<b>626.20</b>	<b>307.70</b>	<b>13,075.01</b>
	<b>KRW</b>	<b>1</b>	<b>436,000.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>436,000.00</b>

**Schedule 7 to Proposed Order**

**Incorrectly Classified and Foreign Currency Claims**

**Incorrectly Classified & Foreign Currency Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	20453	No	Aerovías de México, S.A. de C.V.	AEROVIAJES PACIFICO DE BOGOTA SA CARRERA 13 NO. 77A-80	10,629,730.00	0.00	0.00	0.00	10,629,730.00 COP	No	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/15/2021										
	<b>Modified Claim</b> 20453			AV. EL DORADO NO. 68C-61 LOCAL 109 BOGOTA 110221 COLOMBIA	0.00	0.00	0.00	2,835.06	2,835.06 USD		
2	20421	No	Aerovías de México, S.A. de C.V.	FLECK, RUDI SPÄHNÄCKER 30 GEMMINGEN BW 75050	1,031.11	0.00	0.00	0.00	1,031.11 EUR	No	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/15/2021										
	<b>Modified Claim</b> 20421			GERMANY	0.00	0.00	0.00	1,155.77	1,155.77 USD		
3	20156	No	Aerovías de México, S.A. de C.V.	XIMENES, JOAN CARLES PG. GARCIA FARIA 21, 12º, 3ª	812.36	812.36	0.00	0.00	812.36 EUR	Yes	Insufficient documentation to support secured claim. No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	<b>Date Filed:</b> 12/30/2020										
	<b>Modified Claim</b> 20156			BARCELONA, 08005 SPAIN	0.00	0.00	0.00	910.57	910.57 USD		
<b>Incorrectly Classified and Foreign Currency Claim Totals</b>											
			<b>Count:</b>	<b>COP</b>	<b>1</b>	<b>10,629,730.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>10,629,730.00</b>	
				<b>EUR</b>	<b>2</b>	<b>1,843.47</b>	<b>812.36</b>	<b>0.00</b>	<b>0.00</b>	<b>1,843.47</b>	



**Schedule 8 to Proposed Order**

**Amended and Duplicate Claims**

## Amended Claims &amp; Duplicate Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
1	11757	No	Aerovías de México, S.A. de C.V.	AN, DAYOON 31, SILLIM-RO 70-GIL, GWANAK-GU 701 SEOUL 08753 SOUTH KOREA	0.00	0.00	0.00	518.00	518.00 USD	No	
	Date Filed:	1/5/2021									
	Modified Claim	13005	No	Aerovías de México, S.A. de C.V.	AN, DAYOON 31, SILLIM-RO 70-GIL, GWANAK-GU 701 SEOUL, 08753	0.00	0.00	0.00	518.00	518.00 USD	No
	Date Filed:	1/12/2021									
2	12126	No	Aerovías de México, S.A. de C.V.	COVARRUBIAS, BRENDA VILLEGAS 1422 RIO HONDO DR DALLAS TX 75218	0.00	0.00	0.00	1,171.59	1,171.59 USD	No	
	Date Filed:	1/7/2021									
	Modified Claim	20550	No	Aerovías de México, S.A. de C.V.	COVARRUBIAS, BRENDA VILLEGAS 1422 RIO HONDO DR DALLAS TX 75218	0.00	0.00	0.00	1,171.59	1,171.59 USD	No
	Date Filed:	7/18/2021									
3	12415	No	Aerovías de México, S.A. de C.V.	DOO, AEHEE 1706HO, 101DONG, 63, SEGEOMJEONG-RO 3-GIL, SEODAEMUN-GU, SEOUL, 03623 REPUBLIC OF KOREA	0.00	0.00	0.00	1,129.51	1,129.51 USD	No	
	Date Filed:	1/10/2021									
	Modified Claim	12476	No	Aerovías de México, S.A. de C.V.	DOO, AEHEE 1706HO, 101DONG, 63, SEGEOMJEONG-RO 3-GIL, SEODAEMUN-GU, SEOUL, 03623	0.00	0.00	0.00	1,129.51	1,129.51 USD	No
	Date Filed:	1/10/2021									

## Amended Claims &amp; Duplicate Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
4	13330	No	Aerovías de México, S.A. de C.V.	HAN, MINWOO 14-63, WASEOKSUNHWAN-RO 192BEON-GIL PAJU-SI, GYEONGGI-DO 10901 REPUBLIC OF KOREA	0.00	0.00	0.00	1,500.00	1,500.00 USD	No	
	Date Filed:	1/13/2021									
	Modified Claim	14883	No	Aerovías de México, S.A. de C.V.	HAN, MINWOO 14-63, WASEOKSUNHWAN-RO 192BEON-GIL PAJU-SI, GYEONGGI-DO 10901	0.00	0.00	0.00	1,500.00	1,500.00 USD	No
	Date Filed:	7/13/2021									
5	20327	No	Aerovías de México, S.A. de C.V.	HIGH LIGHT SAO PAULO VIAGENS E TURISMO AV. FRANCISCO MATARAZZO 55 11 3868-2330 55 11 998559417 SAO PAULO SP 05001-200 BRAZIL	0.00	0.00	0.00	34,777.35	34,777.35 BRL	No	
	Date Filed:	1/14/2021									
	Modified Claim	14031	No	Aerovías de México, S.A. de C.V.	HIGH LIGHT SAO PAULO VIAGENS E TURISMO 55 11 3868-2330 SAO PAULO SP 05001-200 BRASIL	0.00	0.00	0.00	6,427.36	6,427.36 USD	No
	Date Filed:	1/14/2021									
6	10703	No	Aerovías de México, S.A. de C.V.	HWANG, EUNJIN SEGWON-RO 334, GWON-SEON JU-GONG APT 333 DONG 301 HO SUWON-SI, GYEONGGI-DO 16552 SOUTH KOREA	0.00	0.00	0.00	531.66	531.66 USD	No	
	Date Filed:	12/26/2020									
	Modified Claim	11464	No	Aerovías de México, S.A. de C.V.	HWANG, EUNJIN SEGWON-RO 334(GWON-SEON JU-GONG APT) 333DONG 301HO SUWON IN GYEONGGI-DO, 16552	0.00	0.00	0.00	531.66	531.66 USD	No
	Date Filed:	1/3/2021									

## Amended Claims &amp; Duplicate Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
7	11084	No	Aerovías de México, S.A. de C.V.	KIM, BYEONGHYEON CALLE GUILLERMO MARCONI 153, SAN ISIDRO LIMA 15076 PERU	0.00	0.00	0.00	4,216.16	4,216.16 USD	No	
	Date Filed:	12/29/2020									
	Modified Claim	14886	No	Aerovías de México, S.A. de C.V.	KIM, BYEONGHYEON CALLE GUILLERMO MARCONI 153, SAN ISIDRO LIMA 15076	0.00	0.00	0.00	4,216.16	4,216.16 USD	No
	Date Filed:	7/28/2021									
8	10485	No	Aerovías de México, S.A. de C.V.	KRAUCHANKA, ULADZISLAU ZYBITSKAYA STR. 6 - OFFICE 52 MINSK 220030 BELARUS	0.00	0.00	0.00	4,003.20	4,003.20 USD	No	
	Date Filed:	12/15/2020									
	Modified Claim	672	No	Aerovías de México, S.A. de C.V.	ULADZISLAU, KRAUCHANKA 6 ZYBITSKAYA OFFICE 52 MINSK 220030	0.00	0.00	0.00	4,003.20	4,003.20 USD	No
	Date Filed:	1/21/2021									
9	13238	No	Aerovías de México, S.A. de C.V.	LEE, EUNJUNG MOJONGDONG 643, CHUNGCHEONGNAM-DO ASAN-SI 31528 SOUTH KOREA	0.00	0.00	0.00	2,003.41	2,003.41 USD	No	
	Date Filed:	1/13/2021									
	Modified Claim	14217	No	Aerovías de México, S.A. de C.V.	AHN, SEOKHYUN A-301, 60 HAAN-RO GWANGMYEONG-SI 14322	0.00	0.00	0.00	610.61	610.61 USD	No
	Date Filed:	1/14/2021									

**Amended Claims & Duplicate Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
10	11799	No	Aerovías de México, S.A. de C.V.	OFFENBACHER, DANIELLE 707 DOVERCOURT RD, UNIT 205 TORONTO ON M6H 2W7 CANADA	0.00	0.00	0.00	1,044.54	1,044.54 USD	No
<b>Date Filed:</b>	1/5/2021									
<b>Modified Claim</b>	14884	No	Grupo Aeroméxico, S.A.B. de C.V.	OFFENBACHER, DANIELLE 100 WESTERN BATTERY RD, UNIT 402 TORONTO ON M6K 3S2	0.00	0.00	0.00	1,438.38	1,438.38 CAD	No
<b>Date Filed:</b>	7/19/2021									
<b>Amended Claim and Duplicate Claim Totals</b>			<b>Count:</b>	<b>BRL</b>	<b>1</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>34,777.35</b>	<b>34,777.35</b>
				<b>USD</b>	<b>9</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>16,118.07</b>	<b>16,118.07</b>

**Schedule 9 to Proposed Order**

**Reduced Claims**

## Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	13057	No	Aerovías de México, S.A. de C.V.	CHOI, DONGSUNB 3, MAGOKJUNGANG12-RO, GANGSEO-GU SEOUL 07789 SOUTH KOREA	0.00	0.00	0.00	14,973.65	14,973.65 Unknown	No
	<b>Date Filed:</b>	1/12/2021								
	<b>Reduced Claim</b>	13057			0.00	0.00	0.00	1,800,800.00	1,800,800.00 KRW	
	<b>Converted Claim</b>	13057			0.00	0.00	0.00	1,499.17	1,499.17 USD	
2	12819	No	Aerovías de México, S.A. de C.V.	CHOI, HYUNGJIN 1202, INJU-DAERO, MICHUHOL-GU INCHEON-SI 22227 SOUTH KOREA	0.00	0.00	0.00	25,038.00	25,038.00 Unknown	No
	<b>Date Filed:</b>	1/11/2021								
	<b>Reduced Claim</b>	12819			0.00	0.00	0.00	1,371,200.00	1,371,200.00 KRW	
	<b>Converted Claim</b>	12819			0.00	0.00	0.00	1,141.52	1,141.52 USD	
3	14257	No	Aerovías de México, S.A. de C.V.	HAN, EUNJEONG 70, NEUTI-RO, BUNDANG-GU, SEONGNAM-SI SEONGNAM-SI, GYEONGGI-DO 13611 REPUBLIC OF KOREA	0.00	0.00	0.00	21,665.23	21,665.23 Unknown	No
	<b>Date Filed:</b>	1/15/2021								
	<b>Reduced Claim</b>	14257			0.00	0.00	0.00	2,763,400.00	2,763,400.00 KRW	
	<b>Converted Claim</b>	14257			0.00	0.00	0.00	2,300.53	2,300.53 USD	
4	13877	No	Aerovías de México, S.A. de C.V.	JO, MANGYEONG 67, SIMJUNG-RO, 102-704 BUCHEON-SI, GYEONGGI-DO 14613 REPUBLIC OF KOREA	0.00	0.00	0.00	10,424.32	10,424.32 Unknown	No
	<b>Date Filed:</b>	1/14/2021								
	<b>Reduced Claim</b>	13877			0.00	0.00	0.00	1,278,500.00	1,278,500.00 KRW	
	<b>Converted Claim</b>	13877			0.00	0.00	0.00	1,064.35	1,064.35 USD	
5	13633	No	Aerovías de México, S.A. de C.V.	JUNG, SUNGHOON 417/1102 70, DOLMI-RO, OKPO-EUP DAEGU 42974 REPUBLIC OF KOREA	0.00	0.00	0.00	63,873.01	63,873.01 Unknown	No
	<b>Date Filed:</b>	1/14/2021								
	<b>Reduced Claim</b>	13633			0.00	0.00	0.00	7,083,400.00	7,083,400.00 KRW	
	<b>Converted Claim</b>	13633			0.00	0.00	0.00	5,896.93	5,896.93 USD	

**Reduced Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
6	12038	No	Aerovías de México, S.A. de C.V.	KO, KAYOUNG 46, MUNJANGRO14-GIL, GUMI GUMI-SI 39198 SOUTH KOREA	0.00	0.00	0.00	26,120.56	26,120.56 Unknown	No
	<b>Date Filed:</b>	1/7/2021								
	<b>Reduced Claim</b>	12038			0.00	0.00	0.00	1,442,900.00	1,442,900.00 KRW	
	<b>Converted Claim</b>	12038			0.00	0.00	0.00	1,201.21	1,201.21 USD	
7	13906	No	Aerovías de México, S.A. de C.V.	KWON, KIDOONG 67, SIMJUNG-RO, 102-704 BUCHEON-SI, GYEONNGI-DO 14613 REPUBLIC OF KOREA	0.00	0.00	0.00	10,424.32	10,424.32 Unknown	No
	<b>Date Filed:</b>	1/14/2021								
	<b>Reduced Claim</b>	13906			0.00	0.00	0.00	1,278,500.00	1,278,500.00 KRW	
	<b>Converted Claim</b>	13906			0.00	0.00	0.00	1,064.35	1,064.35 USD	
8	13378	No	Aerovías de México, S.A. de C.V.	LEE, YOUNGMI 28-2, IPYEONG-RO 85BEON-GIL DONGSONG-EUP DONGSONG PALACE 101DONG 201HO CHEORWON-GUN, GANGWON-DO, 24013 REPUBLIC OF KOREA	0.00	0.00	0.00	19,064.19	19,064.19 Unknown	No
	<b>Date Filed:</b>	1/13/2021								
	<b>Reduced Claim</b>	13378			0.00	0.00	0.00	2,289,800.00	2,289,800.00 KRW	
	<b>Converted Claim</b>	13378			0.00	0.00	0.00	1,906.26	1,906.26 USD	
9	12033	No	Aerovías de México, S.A. de C.V.	MOON, GYUNWOO 46, MUNJANGRO14-GIL, GUMI REPUBLIC OF KOREA GUMI 39198, SOUTH KOREA	0.00	0.00	0.00	26,120.56	26,120.56 Unknown	No
	<b>Date Filed:</b>	1/7/2021								
	<b>Reduced Claim</b>	12033			0.00	0.00	0.00	1,442,900.00	1,442,900.00 KRW	
	<b>Converted Claim</b>	12033			0.00	0.00	0.00	1,201.21	1,201.21 USD	
<b>Reduced Claim Totals</b>			<b>Count:</b>	<b>Unknown</b>	<b>9</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>217,703.84</b>	<b>217,703.84</b>



**Exhibit 2 to Objection**

**Sánchez Declaration**

**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)**

**DECLARATION OF RICARDO JAVIER SÁNCHEZ BAKER IN  
SUPPORT OF THE DEBTORS' EIGHTEENTH OMNIBUS CLAIMS  
OBJECTION TO PROOFS OF CLAIM (WRONG DEBTOR, INCORRECTLY  
CLASSIFIED, FOREIGN CURRENCY, MISCLASSIFIED UNLIQUIDATED,  
AMENDED AND DUPLICATE, AND/OR REDUCED CLAIMS)**

I, Ricardo Javier Sánchez Baker, hereby declare that the following is true to the best of my knowledge, information and belief:

**Background**

1. I am the Chief Financial Officer of Grupo Aeroméxico, S.A.B. de C.V. (“**Grupo Aeroméxico**”), and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**,” the Debtors collectively with their direct and indirect non-Debtor subsidiaries, the “**Company**”). I have held several other positions at the Company since 2006, including serving as advisor to the Chief Executive Officer and Director of Revenue Management. I have been the chairman of the board of directors of the SABRE Corporation, a member of the SEAT Technical Committee, and a member of the Aeromexpress, CECAM, and PLM boards of directors. I have held various positions within the Federal Public Administration (*Administración Pública Federal*), including deputy director general of public debt for the Ministry of Finance and Public

---

<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; 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.

Credit in 2003 and 2005. I hold a bachelor's degree in economics from the Universidad Iberoamericana, a diploma in finance from Instituto Tecnológico Autónomo de México, and master's and doctorate degrees in economics from the University of California, Los Angeles. I am familiar with the day-to-day operations, business, and financial affairs of the Debtors.

2. I submitted the *Declaration of Ricardo Javier Sánchez Baker in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [ECF No. 20] (the "**Sánchez First Day Declaration**"). I make this declaration (the "**Declaration**") in support of the *Eighteenth Omnibus Claims Objection to Proofs of Claim (Wrong Debtor, Incorrectly Classified, Foreign Currency, Misclassified Unliquidated, Amended and Duplicate, and/or Reduced Claims)* (the "**Objection**"). I have reviewed the Objection or have otherwise had its contents explained to me, and the Objection is, to the best of my knowledge, accurate.

3. Except as otherwise indicated, all facts set forth in the Objection and this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, or my opinion based upon experience, knowledge, and information concerning the operations of the Debtors and the aviation industry as a whole. If I were called upon to testify, I could and would testify to each of the facts set forth herein.

4. I am generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and Books and Records<sup>2</sup> that reflect, among other things, the Debtors' liabilities, and the amount thereof owed to their creditors as of the Petition Date. I have read the Objection and corresponding Proposed Order, each filed contemporaneously herewith.

5. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the Claims, the Debtors and other reviewing parties have

---

<sup>2</sup> Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

reviewed the Debtors' Books and Records, the relevant Proofs of Claim, as well as the supporting documentation provided by the claimants, and determined that the: (i) Wrong Debtor Claims; (ii) Incorrectly Classified Claims; (iii) Foreign Currency Claims; (iv) Misclassified Unliquidated Claims; (v) Amended Claims; (vi) Duplicate Claims; and/or (viii) Reduced Claims should be disallowed, expunged, modified, reduced, reclassified, or otherwise treated as set forth in the Objection and Proposed Order, and I concur with this determination.

#### **Wrong Debtor Claims**

6. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Wrong Debtor Claim, the Debtors have determined that each Wrong Debtor Claim has been filed against an incorrect Debtor. If the Wrong Debtor Claims are not modified, the claimants identified on Schedule 1 may improperly receive recoveries on a Claim against the incorrect Debtor. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying the Wrong Debtor Claims as set forth therein and in the Objection.

#### **Incorrectly Classified Claims**

7. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Incorrectly Classified Claim, the Debtors have determined that the claimant for each of these Claims is not entitled to the asserted status or other priority identified in the Claim. If the Incorrectly Classified Claims are not properly reclassified, the claimants identified on Schedule 2 may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order reclassifying the Incorrectly Classified Claims as set forth therein and in the Objection.

**Foreign Currency Claims**

8. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register and each Foreign Currency Claim, the Debtors have determined that the Foreign Currency Claims have each been asserted in a currency other than United States dollars or Mexican pesos. If the Foreign Currency Claims identified on Schedule 3 are not converted to United States dollars, the Claims Register will not reflect the proper amounts for such Claims. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying the Foreign Currency Claims as set forth therein and in the Objection.

**Wrong Debtor and Incorrectly Classified Claims**

9. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Claim identified on Schedule 4, the Debtors have determined that (i) such Claims have been filed against an incorrect Debtor and (ii) the claimant for each of these Claims is not, in part or in full, entitled to the asserted status or other priority identified in the Claim. If the Wrong Debtor and Incorrectly Classified Claims identified on Schedule 4 are not modified and reclassified, the claimants identified therein may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying and reclassifying the Wrong Debtor and Incorrectly Classified Claims identified on Schedule 4 as set forth therein and in the Objection.

**Wrong Debtor and Foreign Currency Claims**

10. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Wrong Debtor and Foreign Currency Claim identified on Schedule 5, the Debtors have determined that such Claims have been (i) filed against an

incorrect Debtor and (ii) asserted in a currency other than United States dollars or Mexican pesos. If the Wrong Debtor and Foreign Currency Claims identified on Schedule 5 are not modified, the claimants identified therein may improperly receive recoveries on a Claim against the incorrect Debtor, and the Claims Register will not reflect the proper amounts for such Claims. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying the Wrong Debtor and Foreign Currency Claims identified on Schedule 5 as set forth therein and in the Objection.

**Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims**

11. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Wrong Debtor, Incorrectly Classified, and Foreign Currency Claim identified on Schedule 6, the Debtors have determined that (i) such Claims have been filed against an incorrect Debtor, (ii) the claimant for each of these Claims is not, in part or in full, entitled to the asserted status or other priority identified in the Claim, and (iii) such Claims have each been asserted in a currency other than United States dollars or Mexican pesos. If the Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims identified on Schedule 6 are not modified and reclassified, the claimants identified therein may improperly receive recoveries on account of the Claim and the Claims Register will not reflect the proper amounts for such Claims. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying and reclassifying the Wrong Debtor, Incorrectly Classified, and Foreign Currency Claims identified on Schedule 6 as set forth therein and in the Objection.

**Incorrectly Classified and Foreign Currency Claims**

12. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Incorrectly Classified and Foreign Currency Claim identified on Schedule 7, the Debtors have determined that (i) the claimant for each

of these Claims is not, in part or in full, entitled to the asserted status or other priority identified in the Claim and (ii) such Claims have each been asserted in a currency other than United States dollars or Mexican pesos. If the Incorrectly Classified and Foreign Currency Claims identified on Schedule 7 are not modified and reclassified, the claimants identified therein may improperly receive recoveries on account of the Claim. Further, the Claims Register will not reflect the proper amounts for such Claims. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying and reclassifying the Incorrectly Classified and Foreign Currency Claims identified on Schedule 7 as set forth therein and in the Objection.

**Amended and Duplicate Claims**

13. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Amended and Duplicate Claim, the Debtors have determined that the Amended and Duplicate Claims set forth on Schedule 8 have (i) been amended or superseded by other Claims filed by or on behalf of the same claimants relating to the same purported liabilities or (ii) are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability.

14. Furthermore, for each Amended and Duplicate Claim, the Debtors have identified a Surviving Claim that asserts the same liability and is identified on Schedule 8 in the applicable row labeled "Surviving Claim."

15. If the Amended and Duplicate Claims identified on Schedule 8 are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Amended and Duplicate Claims as set forth therein and in the Objection.

### **Reduced Claims**

16. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Reduced Claim, the Debtors have determined that each Reduced Claim (i) seeks to recover amounts in excess of what is reflected on the Debtors' Books and Records and/or (ii) was filed with insufficient documentation to support the asserted Claim amount. If the Reduced Claims are not reduced and/or modified as set forth on Schedule 9, the claimants identified therein may obtain recoveries in excess of what they are entitled at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order reducing and/or modifying the Reduced Claims as set forth therein and in the Objection.

### **Conclusion**

17. I am authorized to submit this Declaration on behalf of the Debtors. In my opinion, and for the reasons set forth in this Declaration and in the Objection, (a) modifying, reducing, and/or reclassifying the Wrong Debtor, Incorrectly Classified, Reduced, Foreign Currency, and Reduced Claims and (b) disallowing and expunging the Amended and Duplicate Claims, is in the best interest of the Debtors' estates.

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

Executed: August 18, 2021

By: /s/ Ricardo Javier Sánchez Baker  
Ricardo Javier Sánchez Baker  
Chief Financial Officer



**Exhibit B**

**Omnibus Claims Hearing Procedures**

**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)**

**COURT-ORDERED OMNIBUS CLAIMS HEARING PROCEDURES**

The Omnibus Claims Hearing Procedures (the “**Omnibus Claims Hearing Procedures**”) described herein have been ordered by the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) to apply to the chapter 11 cases of Grupo Aeroméxico, S.A.B. de C.V. and its affiliated debtors.

**Omnibus Claims Hearing Procedures**

1. Pursuant to the Order Establishing Certain Notice, Case Management, and Administrative Procedures, entered on July 8, 2020 [ECF No. 79] (the “**Case Management Order**”), the Court established periodic omnibus hearings (the “**Omnibus Hearings**”) in these cases. The Debtors shall schedule the return date for claims objections, omnibus or otherwise, for hearing at Omnibus Hearings or other hearings the Debtors may schedule with the Court.

2. The Court may enter an order at the scheduled hearing sustaining an objection to proofs of claim (each, a “**Proof of Claim**”) with respect to which no response (a “**Response**”)<sup>2</sup> is

---

<sup>1</sup> The Debtors in these cases, along with the last four digits of 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.

<sup>2</sup> Any information submitted in connection with a Proof of Claim shall be part of the record with respect to the relevant Claim, and any such information already submitted need not be resubmitted in connection with the Omnibus Claims Hearing Procedures.

properly filed and served or pursuant to a certificate of no objection in accordance with the Case Management Order.

3. The hearing to consider an objection to Proofs of Claim as to which a Response is properly filed and served (each, a “**Contested Claim**”) shall be set for a contested hearing (each, an “**Omnibus Claims Hearing**”) to be scheduled by the Debtors, in their discretion, as set forth herein.

4. The Debtors shall schedule an Omnibus Claims Hearing for a Contested Claim as follows:

- A. For a non-evidentiary hearing to address whether the Contested Claim has failed to state a claim against the Debtors that can be allowed and should be dismissed pursuant to Bankruptcy Rule 7012 (a “**Sufficiency Hearing**”), unless the Debtors serve the claimant with a Notice of Merits Hearing (as defined herein), the Sufficiency Hearing shall go forward at the return date set in accordance with paragraph 1 of these Omnibus Claims Hearing Procedures. The legal standard of review that will be applied by the Court at a Sufficiency Hearing will be equivalent to the standard applied by the Court upon a motion to dismiss for failure to state a claim upon which relief can be granted.
- B. For an evidentiary hearing on the merits of a Contested Claim (a “**Merits Hearing**”), the Debtors may, in their discretion, serve upon the relevant claimant, by email or overnight delivery, with a copy to the Official Committee of Unsecured Creditors, Apollo Management Holdings, L.P., and the Ad Hoc Group of Senior Noteholders,<sup>3</sup> and file with the Court, a notice substantially in the form attached to the Claims Objections Procedures Order as **Exhibit 2** (a “**Notice of Merits Hearing**”) at least thirty (30) calendar days prior to the date of such Merits Hearing. The rules and procedures applicable to such Merits Hearing will be set forth in a scheduling order issued by the Court in connection therewith.

5. Discovery with respect to a Contested Claim will not be permitted until either (a) the Court has held a Sufficiency Hearing and determined that the Contested Claim states a claim that could be allowed and should not be dismissed pursuant to Bankruptcy Rule 7012 or (b) the Debtors have served on the relevant claimant a Notice of Merits Hearing with respect to the Contested Claim.

---

<sup>3</sup> As identified in the *Verified Statement of the Ad Hoc Group of Senior Noteholders Pursuant to Bankruptcy Rule 2019* [ECF No. 390].

6. The Debtors may file and serve a reply (a “**Reply**”) to a Response no later than 4:00 p.m., prevailing Eastern Time, on the day that is two (2) calendar days prior to the date of the applicable hearing (which may fall on a Saturday, Sunday, or legal holiday notwithstanding Bankruptcy Rule 9006 or equivalent provisions).

7. The Debtors, in their discretion, are authorized to adjourn a hearing scheduled in accordance herewith at any time by providing notice to the Court and the claimants.