

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

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In re	:
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GRUPO AEROMÉXICO, S.A.B. de C.V., et	:
al.,	:
	:
Debtors.¹	:
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Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**FIFTH SUPPLEMENTAL DECLARATION OF CHRISTIAN HANSEN IN SUPPORT
OF APPLICATION OF DEBTORS PURSUANT TO 11 U.S.C. § 327(e) AND
FED. R. BANKR. P. 2014 AND 2016 AUTHORIZING DEBTORS
TO RETAIN WHITE & CASE LLP AS SPECIAL AVIATION COUNSEL
NUNC PRO TUNC TO PETITION DATE**

I, Christian Hansen, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the law firm of White & Case LLP (“**White & Case**”), and am duly authorized to make this fifth supplemental declaration (the “**Fifth Supplemental Declaration**”) on behalf of White & Case in connection with the *Application of Debtors Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Debtors to Retain White & Case LLP as Special Counsel Nunc Pro Tunc to the Petition Date* (the “**Application**”) [D.I. 218]² filed by the above captioned debtors and debtors-in-possession (the “**Debtors**”) with my initial declaration attached as Exhibit B to the Application (the “**Initial Declaration**”).

2. On September 23, 2020, Court entered the *Order Pursuant to 11 U.S.C. §*

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

² Capitalized terms used but not defined herein shall have the respective meanings ascribed to such terms in the Application and the First Day Declarations.

327(e) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Debtors to Retain White & Case LLP as Special Aviation Counsel Nunc Pro Tunc to Petition Date (the “**Retention Order**”) [D.I. 456], authorizing the Debtors to employ and retain White & Case as special aviation counsel.

3. On September 22, 2020, I submitted the *Second Supplemental Declaration of Christian Hansen in Support of Application of Debtors Pursuant to 11 U.S.C. § 327(E) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Debtors to Retain White & Case LLP as Special Aviation Counsel Nunc Pro Tunc to Petition Date* [D.I. 443] (the “**Second Supplemental Declaration**”).

4. Except as otherwise noted, I have personal knowledge of the matters set forth herein.³

Supplemental Disclosure

5. As detailed in my Second Supplemental Declaration, White & Case is a single, global partnership with 44 offices in 30 countries. While White & Case LLP is the entity under which the vast majority of the firm operates, in a few select jurisdictions we have affiliated entities, typically to satisfy local regulatory or legal requirements. One such example is White & Case, S.C. (“**W&C Mexico City**”), which operates the White & Case office located in Mexico City.

6. W&C Mexico City has historically performed legal work for the Debtors necessary for the Debtors to comply with the laws of Mexico, including administrative, regulatory, securities and other legal advice. These services are unrelated to the work that White & Case has provided as special aviation counsel in accordance with the Retention Order.

7. It has come to my attention that the Debtors have, in the ordinary course of

³ Certain of the disclosures herein relate to matters within the knowledge of attorneys or employees of White & Case and are based on information provided by them.

business, received such services from W&C Mexico City and that the Debtors wish to have W&C Mexico City continue providing such services.

8. After consultation with Davis Polk & Wardwell (“**Davis Polk**”) regarding the nature of the services, we believe that W&C Mexico City should be deemed an ordinary course professional in accordance with the *Order Authorizing Debtors to Employ Professionals Used in the Ordinary Course of Business Nunc Pro Tunc to the Petition Date* [D.I. 213] (the “**OCP Order**”). Therefore, Davis Polk has informed me that the Debtors will seek to have W&C Mexico City retained as an ordinary course professional in accordance with the procedures set forth in the OCP Order.

Dated: August 24, 2020

/s/ Christian Hansen
Christian Hansen
White & Case LLP