

Objection Deadline: September 14, 2021 at 4:00 p.m. (ET)

THE LEE GROUP -PLLC

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Kenneth R Lee

*Special Airline Transaction 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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**THIRD MONTHLY FEE STATEMENT
OF THE LEE GROUP PLLC FOR COMPENSATION
FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED AS SPECIAL AIRLINE TRANSACTION
COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR THE
PERIOD FROM JULY 1, 2021 THROUGH JULY 31, 2021**

Name of Applicant	The Lee Group PLLC
Applicant's Role in Case	Special Airline Transaction Counsel to Grupo Aeroméxico, S.A.B. de C.V., et al.,
Date Order of Employment Signed	July 19, 2021 [ECF No. 1437]
Period for which compensation and reimbursement are sought	July 1, 2021 through July 31, 2021

Summary of Total Fees and Expenses Requested	
Total compensation requested in this statement	\$78,360 (80% of \$97,950)
Total reimbursement requested in this statement	\$0

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.

Total compensation and reimbursement requested in this statement		\$78,360
This is a(n):	<input checked="" type="checkbox"/> Monthly Application	<input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “**Local Rules**”), the United States Trustee’s *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expense filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “**U.S. Trustee Guidelines**”), the *Order Approving Application of Debtors for Authority to Employ and Retain The Lee Group pllc as Special Airline Transaction Counsel for the Debtors Nunc Pro Tunc to April 15, 2021*, dated July 19, 2021 [Docket No. 1437] (the “**Retention Order**”), and the *Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Monthly and Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated September 8, 2020 [Docket No. 360] (the “**Interim Compensation Order**”), The Lee Group pllc (“**The Lee Group**” or “**TLG**”), special airline transaction counsel for the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), submits this *Second Monthly Statement of Services Rendered and Expenses Incurred for the Period from June 1, 2021 through June 30, 2021* (this “**Fee Statement**”).² By this Fee Statement, TLG seeks (i) compensation in the amount of \$78,360, which is equal to 80% of the total amount of compensation sought for actual and necessary services rendered by TLG during the Fee Period (i.e., \$97,950). TLG does not seek the reimbursement of any expenses by this Fee Statement.

Itemization of Services Rendered and Disbursements Incurred

² The period from July 1, 2021, through and including July 31, 2021, is referred to herein as the “**Fee Period**.”

1. Attached hereto as **Exhibit A** is a summary of the number of hours expended and fees incurred (on an aggregate basis) by TLG attorneys during the Fee Period with respect to each of the project categories TLG established in accordance with its internal billing procedures.

2. Attached hereto as **Exhibit B** is a summary of TLG attorneys, including the standard hourly rate for each attorney who rendered services to the Debtors in connection with these chapter 11 cases during the Fee Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Fee Period is \$500.00.³

3. Attached hereto as **Exhibit C** is a chart of expenses that TLG incurred or disbursed in connection with providing professional services to the Debtors during the Fee Period. For this Fee Period, TLG is not seeking reimbursement of any expenses.

4. Attached hereto as **Exhibit D** are the time records of TLG for the Fee Period organized by project category with a daily time log describing the time spent by each attorney during Fee Period.

Notice and Objection Procedures

5. Notice of this Fee Statement shall be served by hand or overnight delivery upon (i) Grupo Aeroméxico, S.A.B. de C.V., Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500, Attn.: Daniel Martinez Martinez and Patricia Bobadilla, Email: dmartinezm@aeromexico.com, mbobadilla@aeromexico.com; (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Timothy Graulich and Stephen Piraino, Email: timothy.graulich@davispolk.com,

³ The blended hourly billing rate of \$500 for attorneys is derived by dividing the total fees for attorneys by the total hours billed.

stephen.piraino@davispolk.com; (iii) counsel to the Committee, Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, NY 10019, Attn.: Brett Miller and Todd Goren, Email: bmillier@willkie.com, tgoren@willkie.com; (iv) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn.: Andrea Beth Schwartz, Email: andrea.b.schwartz@usdoj.gov; and (v) Counsel to the DIP Lender, Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, Attn.: Richard J. Cooper, Luke A. Barefoot, Thomas S. Kessler, Email: rcooper@cgsh.com, lbarefoot@cgsh.com, tkessler@cgsh.com (collectively, the “**Notice Parties**”).

6. Objections to the Fee Statement, if any, must be served upon the Notice Parties no later than **September 14, 2021** (the “**Objection Deadline**”), setting forth the nature of the objection and specific amount of fees and expenses at issue.

7. The Debtors will provide notice of this Fee Statement in accordance with the Interim Compensation Order. The Debtors submit that no other or further notice be given.

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WHEREFORE, The Lee Group, in connection with services rendered on behalf of the Debtors, respectfully requests (i) compensation in the amount of \$78,360 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that The Lee Group incurred in connection with such services during the Fee Period (i.e., \$97,950).

Dated: August 30, 2021
Washington, DC

THE LEE GROUP PLLC

/s/ Kenneth R. Lee

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