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-and-

Juan P. Morillo 1300 I Street NW, Suite 900 Washington, D.C. 20005 Telephone: 202-538-8000 Email: juanmorillo@quinnemanuel.com

Attorneys for Certain Directors of Grupo Aeroméxico S.A.B. de C.V.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

GRUPO AEROMÉXICO, S.A.B. de C.V., *et al.*,¹

Case No.: 20-11563 (SCC) (Jointly Administered)

Debtors.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002

PLEASE TAKE NOTICE that Quinn Emanuel Urquhart & Sullivan LLP ("Quinn

Chapter 11

Emanuel") hereby appears as counsel for Certain Directors of Grupo Aeroméxico S.A.B. de C.V.

("the Directors") and requests, pursuant to 11 U.S.C. §1109(b) and Rules 2002, 9007 and 9010(b)

of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), that all notices given or

¹ The Debtors in these cases, along with the Debtors' registration numbers 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; Aerovias 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.

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required to be given in this case or in any proceeding herein and all papers served or required to be served in this case or in any proceeding herein be given to and served upon the following:

> QUINN EMANUEL URQUHART & SULLIVAN, LLP Patricia Tomasco Joanna Caytas Samantha Gillespie 51 Madison Avenue, 22nd Floor New York, New York 10010 Telephone: 212-849-7000 Facsimile: 212-849-7100 Email: pattytomaso@quinnemanuel.com joannacaytas@quinnemanuel.com samanthagillespie@quinnemanuel.com

-and-

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the rules specified above but also includes, without limitation, copies of any orders (including orders to show cause) and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, overnight mail or courier, hand delivery, telephone, telecopies, telegraph, telex or otherwise, that affects the Debtors or property of the Debtors' estate.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended to waive (i) the Directors' rights to have final orders in non-core matters entered only after *de novo* review by the District Court, (ii) the Directors' rights to trial by jury in any proceeding so triable herein or in any case, controversy

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or proceeding related hereto, (iii) the Directors' rights to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Directors are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Directors expressly reserve.

Respectfully submitted this 31th day of August, 2021.

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Patricia Tomasco

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-and-

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