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Conflicts Counsel to the Ad Hoc Group of Unsecured Claimholders

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

_____) Chapter 11
In re:)
) Case No. 20-11563 (SCC)
GRUPO AEROMÉXICO, S.A.B. de C.V., et al., ¹)
)
)
) Jointly Administered
Debtors.)
_____)

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND PAPERFRS**

PLEASE TAKE NOTICE that Glenn Agre Bergman & Fuentes LLP hereby appears in the above-captioned chapter 11 cases pursuant to Section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), as conflicts counsel to funds managed by Nut Tree Capital Management, P. Schoenfeld Asset Management L.P., and Invictus Global Management, LLC (collectively, the “Ad Hoc Group of Unsecured Claimholders”), and requests, pursuant to Sections 342 and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 9007, and 9010, that all

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.

notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following office address, telephone number and e-mail addresses:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically or otherwise, which affect the Debtors or property of the Debtors.

PLEASE TAKE FURTHER NOTICE that demand is also made that the above-referenced attorneys be added to the Service List² for notice of all contested matters, adversary proceedings, and other proceedings in these Chapter 11 cases.

² Terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* [Dkt. No. 79].

PLEASE TAKE FURTHER NOTICE that this notice of appearance and request for notices and papers shall not be deemed to be a waiver of the rights of the Ad Hoc Group of Unsecured Claimholders: (i) to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) to any other rights, claims, actions, setoffs, or recoupments to which the Ad Hoc Group of Unsecured Claimholders is or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, and recoupments the Ad Hoc Group of Unsecured Claimholders expressly reserves; or (v) to any and all defenses or objections the Ad Hoc Group of Unsecured Claimholders may have to any claims asserted against it in these cases including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued. The undersigned certifies that the parties listed in the first paragraph are admitted to practice before this Court.

Dated: September 10, 2021
New York, New York

By: /s/ Andrew K. Glenn
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