

THIS OBJECTION SEEKS TO DISALLOW, EXPUNGE, MODIFY, REDUCE, AND/OR RECLASSIFY CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' TWENTY-FIFTH 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 (moshe.melcer@davispolk.com or +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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**NOTICE OF HEARING ON DEBTORS' TWENTY-FIFTH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG
DEBTOR, INCORRECTLY CLASSIFIED, SET AMOUNT, NO LIABILITY,
AMENDED, DUPLICATE, REDUCED, AND FOREIGN CURRENCY CLAIMS)**

PLEASE TAKE NOTICE that, on October 4, 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 *Twenty-Fifth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, Set Amount, No Liability, Amended, Duplicate, Reduced, and Foreign Currency Claims)* (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

¹ 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 Claims² listed on the schedules (collectively, the “**Schedules**”) attached to **Exhibit 1** of the Objection on the grounds that such Claims:

- (i) incorrectly state that all or a portion of the Claim is unliquidated (“**Misclassified Unliquidated Claims**”);
- (ii) have been filed against the wrong Debtor (“**Wrong Debtor Claims**”);
- (iii) in part or in full, are not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”);
- (iv) seeks an undetermined amount that now requires modification to match the amounts reflected in the Debtors’ Books and Records (“**Set Amount Claim**”);
- (v) seek to recover amounts for which the Debtors are not liable (“**No Liability Claims**”);
- (vi) (a) have been paid or otherwise satisfied by the Debtors after the Petition Date in accordance with the Bankruptcy Code, applicable rules, or an order issued by the Bankruptcy Court or (b) have been satisfied in full by a party that is not a Debtor (collectively, “**Satisfied Claims**”);
- (vii) have been amended or superseded by other Claims (“**Amended Claims**”);
- (viii) are duplicative of other Claims (“**Duplicate Claims**”);
- (ix) seek to recover amounts in excess of the accurate Claim amount (“**Reduced Claims**”); and/or
- (x) were asserted in a currency other than United States dollars or Mexican pesos (“**Foreign Currency 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

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

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, 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 **November 4, 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 **November 16, 2021 at 11:00 a.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). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.³

³ 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>.

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.**

Dated: October 4, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich
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New York, New York 10017
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Timothy Graulich
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Stephen D. Piraino
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors
and Debtors in Possession*

Exhibit A

Objection

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**UNITED STATES BANKRUPTCY COURT
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**DEBTORS' TWENTY-FIFTH OMNIBUS CLAIMS OBJECTION TO PROOFS
OF CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG DEBTOR,
INCORRECTLY CLASSIFIED, SET AMOUNT, NO LIABILITY,
AMENDED, DUPLICATE, REDUCED, AND FOREIGN CURRENCY 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.

* * *

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; 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 *Twenty-Fifth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, Set Amount, No Liability, Amended, Duplicate, Reduced, and Foreign Currency 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 Twenty-Fifth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, Set Amount, No Liability, Amended, Duplicate, Reduced, and Foreign Currency 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.²

² 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 18 omnibus claims objections filed by the Debtors in accordance the Claims Objections Procedures Order. *See* ECF Nos. 1086–87, 1102, 1207–08, 1403–04, 1575, 1577–78, 1580–85, 1755, 1771.

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:

Schedule	Objection Basis
1	Misclassified Unliquidated Claims ³
2 (a)	Wrong Debtor Claims
(b)	Wrong Debtor and Misclassified Unliquidated Claims
3 (a)	Incorrectly Classified Claims
(b)	Incorrectly Classified and Misclassified Unliquidated Claims
(c)	Incorrectly Classified and Wrong Debtor Claims
(d)	Incorrectly Classified and Set Amount Claims
4	No Liability Claims
5	Satisfied Claims
6 (a)	Amended Claims
(b)	Duplicate Claims
7 (a)	Reduced Claims
(b)	Reduced and Wrong Debtor Claims
(d)	Reduced and Incorrectly Classified Claims
8	Foreign Currency Claims

A. Misclassified Unliquidated Claims

23. The Debtors object to certain Claims listed on Schedules 1, 2(b), and 3(b) that all or a portion of the Claim is unliquidated (“**Misclassified Unliquidated Claims**”). Through this Objection, the Debtors seek to modify the Misclassified Unliquidated Claims as Claims for fixed amounts that are not “unliquidated.” While the Debtors at this time do not object to the stated amounts of such Claims, the Debtors’ Books and Records indicate that each Misclassified

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

Unliquidated Claim is not unliquidated, nor are the claimants in connection with each Misclassified Unliquidated Claim owed any additional unliquidated amounts in connection with their Misclassified Unliquidated Claim.

24. Pursuant to the Claims Objections Procedures Order, the Debtors may file omnibus claims objections to Claims that are “inconsistent with the Debtors’ books and records” or fail to “specify sufficiently the basis for the claim or provide sufficient supporting documentation for such claim.” Claims Obj. Proc. Order, ¶ 2(a)(i)–(ii).

25. To the extent the Misclassified Unliquidated Claims assert unliquidated claim amounts, such amounts are inconsistent with the Debtors’ Books and Records and are not supported by sufficient supporting documentation. In order to preserve the integrity and accuracy of the Claims Register, and to avoid the claimants from improperly receiving additional recoveries on account of their Misclassified Unliquidated Claims at the expense of the Debtors and other creditors, the Debtors request that the Misclassified Unliquidated Claims be modified as set forth on Schedules 1, 2(b), and 3(b), in the corresponding row labeled “Modified Claim.”

B. Wrong Debtor Claims

26. The Debtors object to the Claims listed on Schedules 2, 3(c), and 7(b) 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.

27. 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).

28. 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 Schedules 2, 3(c), and 7(b).

C. Incorrectly Classified Claims

29. The Debtors object to the Claims listed on Schedules 3 and 7(c) and request that each such Claim be reclassified as set forth therein, as each of these Claims is not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”).

30. 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 Schedules 3 and 7(c) in the column labeled “Reason.”

31. The Debtors respectfully request that the Incorrectly Classified Claims be reclassified as set forth on Schedules 3 and 7(c) in the corresponding row labeled “Modified Claim,” to avoid

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

D. Set Amount Claim

32. The Debtors object to the Claim listed on Schedule 3(d) and request that such Claim be modified, as such Claim seeks an undetermined amount that now requires modification to match the amounts reflected in the Debtors' Books and Records (the "**Set Amount Claim**").

33. 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 the Set Amount Claim and any documentation provided therewith, the Debtors have determined that the asserted amount therein is inconsistent with what the Debtors' Books and Records and/or is not supported by the documentation provided by the claimant.

34. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries inconsistent with what they are entitled at the expense of the Debtors and other creditors, the Debtors respectfully request that the Court set the amount of the Set Amount Claim such that the amount of the Set Amount Claim corresponds with the Debtors' Books and Records, as set forth in more detail on Schedule 3(d) in the corresponding row labeled "Modified Claim."

E. No Liability Claims

35. The Debtors object to the Claims listed on Schedule 4 and request that each such Claim be disallowed and expunged in its entirety, as such Claims seek to recover amounts for which the Debtors are not liable (“**No Liability Claims**”).

36. 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). After analyzing each No Liability Claim and reviewing the Books and Records, the Debtors have determined that the No Liability Claims (i) fail to establish a basis for a valid claim against the Debtors and (ii) seek recovery for amounts for which the Debtors are not liable. The specific basis for objection to each No Liability Claim is set forth on Schedule 4 in the column labeled “Reason.”

37. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on account of the No Liability Claims at the expense of the Debtors and other creditors, the Debtors respectfully request that each No Liability Claim be disallowed and expunged in its entirety.

F. Satisfied Claims

38. The Debtors object to the Claims listed on Schedule 5 (the “**Satisfied Claims**”) and request that each such Satisfied Claim be disallowed and expunged in its entirety, as (i) each Satisfied Claim has been paid or otherwise satisfied by the Debtors after the Petition Date, “in accordance with the Bankruptcy Code, applicable rules, or a court order,” see Fed. R. Bankr. P. 3007(d)(5), including pursuant to the Court’s First Day Orders, or (ii) has been satisfied in full by a party that is not a Debtor.

39. As the Debtors do not owe any further amounts with respect to the Satisfied Claims, to avoid the same claimant from improperly receiving multiple recoveries at the expense of the

Debtors and other creditors, the Debtors request that the Satisfied Claims be disallowed and expunged in their entirety.

G. Amended and Duplicate Claims

40. The Debtors object to the Claims listed on Schedule 6 and request that such Claims be disallowed and expunged in their entirety, as (i) the Claims set forth on Schedule 6(a) have been amended or superseded by other Claims filed by or on behalf of the same claimants relating to the same purported liabilities (“**Amended Claims**”) and (ii) the Claims set forth on Schedule 6(b) are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability (“**Duplicate Claims**”).

41. 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].

42. If the Amended and Duplicate Claims identified on Schedule 6 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.

43. 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 6 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.

H. Reduced Claims

44. The Debtors object to the Claims listed on Schedule 7 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**").

45. 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.

46. 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 7 in the corresponding row labeled “Reduced Claim.”⁴

I. Foreign Currency Claims

47. The Debtors object to the Claims set forth on Schedule 8 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**”).

48. 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).”).

⁴ Upon the agreement of counsel to the Debtors and The Boeing Company (“**Boeing**”), this Objection consensually seeks to reduce Claim number 14215 filed by Boeing pursuant to the *Order Authorizing the Debtors To Enter into an Amended Agreement with The Boeing Company and Approval of Compromises Reflected Therein* [ECF No. 1141] entered on April 30, 2021.

49. 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 8 in the corresponding row labeled “Modified Claim.”

Separate Contested Matters

50. 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

51. 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.

52. 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.

53. 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

54. 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) Misclassified Unliquidated Claims; (ii) Wrong Debtor Claims; (iii) Incorrectly Classified Claims; (iv) Set Amount Claim; (v) No Liability Claims; (vi) Satisfied Claims; (vii) Amended and Duplicate Claims; (viii) Reduced Claims; and/or (ix) Foreign Currency 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.

55. 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

56. 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

57. 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: October 4, 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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**ORDER GRANTING DEBTORS' TWENTY-FIFTH OMNIBUS CLAIMS OBJECTION
TO PROOFS OF CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG DEBTOR,
INCORRECTLY CLASSIFIED, SET AMOUNT, NO LIABILITY, AMENDED,
DUPLICATE, REDUCED, AND FOREIGN CURRENCY CLAIMS)**

Upon the objection (the “**Objection**”)² 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, 7, and 8 attached hereto, as described therein and (b) disallow and expunge the Claims identified on Schedules 4, 5, and 6 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

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; 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.

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

pursuant to 28 U.S.C. § 157(b)(2); and due and proper notice of the Objection and opportunity for a 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 Claims identified on **Schedules 1, 2(b), and 3(b)** annexed hereto are hereby modified as described therein such that each Misclassified Unliquidated Claim shall not be considered unliquidated for any purpose in the Chapter 11 Cases.
3. The Claims identified on **Schedules 2, 3(c), and 7(b)** 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(s)” applicable thereto on **Schedules 2, 3(c), and 7(b)**.
4. The Incorrectly Classified Claims identified on **Schedules 3 and 7(c)** annexed hereto are hereby reclassified as described in the corresponding row labeled “Modified Claim” on **Schedules 3 and 7(c)** 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.
5. The Set Amount Claim identified on **Schedule 3(d)** annexed hereto is hereby modified as described in the corresponding row labeled “Modified Claim” on **Schedule 3(d)** 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.

6. The No Liability Claims identified on **Schedule 4** annexed hereto are hereby disallowed and expunged in their entirety.

7. The Satisfied Claims identified on **Schedule 5** annexed hereto are hereby disallowed and expunged in their entirety.

8. The Amended and Duplicate Claims identified on **Schedule 6** annexed hereto are hereby disallowed and expunged in their entirety.

9. The Reduced Claims identified on **Schedule 7** annexed hereto are hereby modified and reduced as set forth therein, and shall be reflected in the Claims Register in the amounts set forth on **Schedule 7** in the column labeled “Reduced Claim Amount.”

10. The Foreign Currency Claims identified on **Schedule 8** annexed hereto are hereby modified as described in the corresponding row labeled “Modified Claim” on **Schedule 8**.

11. All Claims identified on **Schedule 6** 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. All Claims listed on the Schedules annexed hereto that were not asserted in United States dollars are hereby modified to be Claims listed in United States dollars, as described in the respective Schedules attached hereto.

13. 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.

14. 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.

15. 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.

16. 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

Misclassified Unliquidated Claim

Misclassified Unliquidated Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	13406	No	Aerovias Empresa de Cargo, S.A. de C.V.	SITA SCRL ATTN MICHAEL BECK 26 CHEMIN DE JOINVILLE COITRIN GENEVA, 1216, SWITZERLAND	0.00	0.00	0.00	172,918.73	172,918.73 USD	Yes
	Date Filed:	1/13/2021								
	Modified Claim	13406			0.00	0.00	0.00	172,918.73	172,918.73 USD	No
Misclassified Unliquidated Claim Total			Count:	USD	1	0.00	0.00	0.00	172,918.73	

Schedule 2

(a) Wrong Debtor Claims

(b) Wrong Debtor and Misclassified Unliquidated Claims

Wrong Debtor Claims

Ref	Claim #	Transferred	Name and Address of Claimant	Wrong Debtor	Correct Debtor	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
1	314	No	EVENTMEDIA SOLUCIONES SL FRACISCO ROVER 1 PALMA DE MALLORCA ISLAS BALEARES 07003, SPAIN	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	23,080.37	23,080.37 USD	No
	Date Filed:	1/11/2021									
2	237	No	FLIGHT SPECIALTIES COMPONENTS CORP 375 ALPHA PARK HIGHLAND HEIGHTS, OH 44143	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,300.00	3,300.00 USD	No
	Date Filed:	12/29/2020									
3	12077	No	GIE MANOR 84 RUE D'HAUTEVILLE PARIS 75010, FRANCE	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	6,133.00	6,133.00 USD	No
	Date Filed:	1/7/2021									
4	20231	No	KORN FERRY MEXICO SC SIERRA NEVADA 130 PB LOMAS DE CHAPULTEPEC V SECCION CIUDAD DE MEXICO 11000, MEXICO	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	104,629.70	104,629.70 USD	No
	Date Filed:	1/12/2021									
5	11175	No	MORTEN BEYER & AGNEW INC 2101 WILSON BLVD, STE 1001 ARLINGTON, VA 22201	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,031.00	3,031.00 USD	No
	Date Filed:	12/30/2020									
6	251	No	STATE OF HAWAII DEPT OF TRANSPORTATION AIRPORTS DIVISION 400 RODGERS BLVD, STE 700 HONOLULU, HI 96819-1897	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	109.75	109.75 USD	No
	Date Filed:	1/8/2021									
7	14024	No	STUART & ASSOCIATES PC 712 MAIN, STE 1100 HOUSTON, TX 77002	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	12,000.00	12,000.00 USD	No
	Date Filed:	1/14/2021									

*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	Name and Address of Claimant	Wrong Debtor	Correct Debtor(s)	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated
8	10335	No	TRINCAS VIA DE MARTIS 2 CAGLIARI, 09121, ITALY	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	389.00	389.00 USD	No
Date Filed:	12/9/2020										
9	392	No	US TECHNICAL CONSULTANTS INC ATTN CLAUDIA DANA PETRISOR, HR/ACCT 2461 E ORANGETHORPE AVE, STE 105 FULLERTON, CA 92831	Grupo Aeroméxico, S.A.B. de C.V.	Aerolitoral, S.A.	0.00	0.00	0.00	15,455.00	15,455.00 USD	No
Date Filed:	1/14/2021										

Wrong Debtor Claim Totals:	Count:	USD	9	0.00	0.00	0.00	168,127.82	168,127.82
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Wrong Debtor and Misclassified Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	20033	No	Grupo Aeroméxico, S.A.B. de C.V.	GRAINGER SA DE CV AVE DESARROLLO 500 PARQUE FINSA GUADALUPE, NL, 67132	0.00	0.00	0.00	5,500,327.31	5,500,327.31 MXN	Yes
	Date Filed:	9/25/2020								
	Modified Claim	20033.1	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	235,832.91	235,832.91 USD	No
		20033.2	Aerolitoral, S.A.		0.00	0.00	0.00	3,204.37	3,204.37 USD	No
2	14792	No	Grupo Aeroméxico, S.A.B. de C.V.	MORTEN BEYER & AGNEW INC 2101 WILSON BLVD, STE 1001 ARLINGTON, VA 22201	0.00	0.00	0.00	19,000.00	19,000.00 USD	Yes
	Date Filed:	2/25/2021								
	Modified Claim	14792	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	19,000.00	19,000.00 USD	No
Wrong Debtor and Misclassified Unliquidated Claim Total			Count:	USD	1	0.00	0.00	0.00	19,000.00	19,000.00
				MXN	1	0.00	0.00	0.00	5,500,327.31	5,500,327.31

Schedule 3

- (a) Incorrectly Classified Claims**
- (b) Incorrectly Classified and Misclassified Unliquidated Claims**
- (c) Incorrectly Classified and Wrong Debtor Claims**
- (d) Incorrectly Classified and Set Amount Claim**

Incorrectly Classified Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
1	20436	No	Aerovías de México, S.A. de C.V.	ALIANZA CHINA SC PUERTO CASTILLA 3858, COL. LAS BRISAS MONTERREY, NUEVO LEON 64780 MÉXICO	0.00	2,935.60	0.00	0.00	2,935.60 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
	Date Filed: 1/15/2021										
	Modified Claim 20436				0.00	0.00	0.00	2,935.60	2,935.60 USD	No	
2	713	No	Aerovías de México, S.A. de C.V.	DUTRIZ HERMANOS SA DE CV BOULEVARD SANTA ELENA, CALLE CONCHAGUA E IZALCO ANTIGUO CUSCATLAN LA LIBERTAD 1511 EL SALVADOR	0.00	0.00	739.00	0.00	739.00 USD	No	Insufficient documentation to support priority claim.
	Date Filed: 3/4/2021										
	Modified Claim 713				0.00	0.00	0.00	739.00	739.00 USD	No	
3	141	No	Aerovías de México, S.A. de C.V.	SUAREZ, FRANCISCO FERNANDEZ ALFA #60 COL ROMERO DE TERREROS ALC COYOACAN CIUDAD DE MEXICO, 04310, MEXICO	0.00	0.00	33,634.20	0.00	33,634.20 MXN	No	Insufficient documentation to support priority claim.
	Date Filed: 12/10/2020										
	Modified Claim 141				0.00	0.00	0.00	1,456.70	1,456.70 USD	No	
Incorrectly Classified Claims Total				Count:	USD	2	0.00	2,935.60	739.00	0.00	3,674.60
					MXN	1	0.00	0.00	33,634.20	0.00	33,634.20

*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).

Incorrectly Classified and Misclassified Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
1	20450	No	Aerovías de México, S.A. de C.V.	CIA EXPLOTADORA DE INMUEBLES SA DE CV MELCHOL OCAMPO ORIENTE 443 MONTERREY, NL 64000, MEXICO	0.00	1,117,265.72	0.00	0.00	1,117,265.72 MXN	Yes	Goods not delivered within 20 days and are not entitled to administrative claim (§503(b)(9))
	Date Filed: 1/15/2021										
	Modified Claim 20450				0.00	0.00	0.00	48,388.89	48,388.89 USD	No	
2	10225	No	Aerovías de México, S.A. de C.V.	CINTAS COVE SA DE CV CALLE JACARANDAS NO 13 COL SAN ISIDRO CUAUTITLAN IZCALLI, MX, 54730 MEXICO	0.00	6,679.74	0.00	0.00	6,679.74 USD	Yes	Goods not delivered within 20 days and are not entitled to administrative claim (§503(b)(9))
	Date Filed: 9/14/2020										
	Modified Claim 10225				0.00	0.00	0.00	6,679.74	6,679.74 USD	No	
3	20024	No	Aerolitoral, S.A.	CONSORCIO HOTELERO AEROPUERTO MONTERREY CARRETERA MIGUEL ALEMAN S/N KILOMETRO 24 APODACA, NL, 66600 MEXICO	7,776.00	0.00	7,776.00	0.00	7,776.00 USD	Yes	Insufficient documentation to support secured, priority claim.
	Date Filed: 9/9/2020										
	Modified Claim 20024				0.00	0.00	0.00	7,776.00	7,776.00 USD	No	
4	20265	No	Aerovías de México, S.A. de C.V.	FURLONG-FOX SA CARLOS PELLEGRINI 1163 3ER PISO CONTRAFRENTE CIUDAD DE BUENOS AIRES C1009ABU ARGENTINA	348,935.00	0.00	0.00	0.00	348,935.00 ARS	Yes	Insufficient documentation to support secured claim
	Date Filed: 1/13/2021										
	Modified Claim 20265				0.00	0.00	0.00	4,953.04	4,953.04 USD	No	
5	20004	No	Aerolitoral, S.A.	GRUPO CARCIO SA DE CV AV CERRITO COLORADO SANTIAGO DE QUERETARO, 76116 MEXICO	0.00	153,196.56	0.00	0.00	153,196.56 MXN	Yes	Goods not delivered within 20 days and are not entitled to administrative claim (§503(b)(9))
	Date Filed: 8/13/2020										
	Modified Claim 20004				0.00	0.00	0.00	6,634.96	6,634.96 USD	No	
6	20554	No	Aerovías de México, S.A. de C.V.	SKATT ASESORES FISCALES SC AV. SANTA FE #428 TORRE III PISO 20 INT 2001, LOMAS DE SANTA FE CUAJIMALPA DE MORELOS CIUDAD DE MÉXICO DF 05300 MÉXICO	0.00	841,000.00	0.00	0.00	841,000.00 MXN	Yes	No goods delivered; not entitled to administrative claim (§503(b)(9))
	Date Filed: 9/23/2021										
	Modified Claim 20554				0.00	0.00	0.00	36,423.71	36,423.71 USD	No	

*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).

Incorrectly Classified and Misclassified Unliquidated Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
7	20251	No	Aerovías de México, S.A. de C.V.	TEDDY BEAR VACATIONS MEXICO SA DE CV LAZARO GARZA AYALA 167 COL TAMPIQUITO SAN PEDRO GARZA GARCIA NL 66240 MEXICO	0.00	0.00	2,664.50	0.00	2,664.50 USD	Yes	Insufficient documentation to support priority claim.
	Date Filed: 1/12/2021										
	Modified Claim 20251				0.00	0.00	0.00	2,664.50	2,664.50 USD	No	

Incorrectly Classified and Misclassified Unliquidated Claims Total	Count:	USD	3	7,776.00	6,679.74	10,440.50	0.00	17,120.24
		ARS	1	348,935.00	0.00	0.00	0.00	348,935.00
		MXN	3	0.00	2,111,462.28	0.00	0.00	2,111,462.28

Incorrectly Classified and Wrong Debtor Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	106	No	Grupo Aeroméxico, S.A.B. de C.V.	ADVANCED GROUND SYSTEMS ENGINEERING LLC 10805 PAINTER AVE SANTA FE SPRINGS, CA 90670	43,990.00	0.00	0.00	0.00	43,990.00 USD	No	Insufficient documentation to support secured claim
	Date Filed: 10/13/2020										
	Modified Claim 106		Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	43,990.00	43,990.00 USD	No	
2	11619	No	Grupo Aeroméxico, S.A.B. de C.V.	GLOBAL INFLIGHT PRODUCTS 8918 152ND AVE NE REDMOND, WA 98052	0.00	32,850.00	0.00	768.64	33,618.64 USD	Yes	Goods not delivered within 20 days and are not entitled to administrative claim (§ 503(b)(9)); invoice F9946 (for \$9,576) is for post-petition deliveries and therefore is entitled to administrative status
	Date Filed: 1/4/2021										
	Modified Claim 11619		Aerovías de México, S.A. de C.V.		0.00	9,576.00	0.00	24,024.64	33,618.64 USD	Yes	
Incorrectly Classified and Wrong Debtor Claims Total											
			Count:	USD	2	43,990.00	32,850.00	0.00	768.64	77,608.64	

Incorrectly Classified and Set Amount Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	14542	No	Aerovías de México, S.A. de C.V.	DECOLAR.COM LTDA, ET AL C/O DENTONS US LLP ATTN LAUREN MACKSOUND 1221 AVENUE OF THE AMERICAS NEW YORK, NY 10020	0.00	0.00	0.00	0.00	0.00 USD	Yes	Insufficient documentation to support priority claim; Amount set per company's books and records
	Date Filed: 1/15/2021										
	Modified Claim 14542				0.00	0.00	0.00	289,488.96	289,488.96 USD	No	

Incorrectly Classified and Set Amount Claim Total	Count:	USD	1	0.00	0.00	0.00	0.00	0.00
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Schedule 4

No Liability Claims

No Liability Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	Reason
1	10233	No	Grupo Aeroméxico, S.A.B. de C.V.	AERITAS LLC C/O BRAGAR EAGEL & SQUIRE PC ATTN LAWRENCE P EAGEL 885 THIRD AVE, STE 3040 NEW YORK, NY 10022	0.00	0.00	0.00	1,0250,040.00	1,0250,040.00 USD	Yes	Debtors have no knowledge of the claimant or the issue claimed
	Date Filed:	9/21/2020									
2	10276	No	Aerolitoral, S.A.	AERITAS LLC C/O BRAGAR EAGEL & SQUIRE PC ATTN LAWRENCE P EAGEL 810 SEVENTH AVE, STE 620 NEW YORK, NY 10019	0.00	0.00	0.00	1,0250,040.00	1,0250,040.00 USD	Yes	Debtors have no knowledge of the claimant or the issue claimed
	Date Filed:	10/14/2020									
3	10277	No	Aerovias Empresa de Cargo, S.A. de C.V.	AERITAS LLC C/O BRAGAR EAGEL & SQUIRE PC ATTN LAWRENCE P EAGEL 810 SEVENTH AVE, STE 620 NEW YORK, NY 10019	0.00	0.00	0.00	1,0250,040.00	1,0250,040.00 USD	Yes	Debtors have no knowledge of the claimant or the issue claimed
	Date Filed:	10/14/2020									
4	20014	No	Grupo Aeroméxico, S.A.B. de C.V.	CORDOVA, GUADALUPE ALEJANDRINA GONZALEZ MARGIL DE JESUS # 201 FRACC CIRCUNVALACION NORTE ESQUINA CON CALLE ENCINO AGUASCALIENTES, AG 20020 MÉXICO	0.00	0.00	0.00	1,039.96	1,039.96 USD	Yes	Claim is against non debtor - Administradora Especializada en Negocios, S.A. De D.V.
	Date Filed:	8/25/2020									
No Liability Claim Totals			Count:	USD	4	0.00	0.00	0.00	3,751,159.96	3,751,159.96	

*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).

Schedule 5

Satisfied Claims

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	565000030	No	Aerolitoral, S.A.	AAACESA ALMACENES FISCALIZADOS SA DE CV AV.602 S/N RECINTO FISCAL 23 DE LA ADUANA DE A.I.C.M ZONA FEDERAL AEROPUERTO INTERNACIONAL VENUSTIANO CARRANZA CDMX 15620 MEXICO	0.00	0.00	0.00	7,752.26	7,752.26 USD	No
	Date Filed:	8/25/2020								
2	561009400	No	Aerovías de México, S.A. de C.V.	AGENCIA DE ADUANA BRUNO PERINETTI ZELAYA Y CIA LTDA SANTO DOMINGO 680 SANTIAGO CENTRO SANTIAGO REGION METROPOLITANA 8320000 CHILE	0.00	0.00	0.00	661.95	661.95 USD	No
	Date Filed:	8/25/2020								
3	561009420	No	Aerovías de México, S.A. de C.V.	AGENCIA DE CONTRATACION A REPRESENTACIONES COMERCIALES SA Calle: 22 NO. 318 ENTRE 3ra. Y 5ta, MIRAMAR. LA HABANA LA HABANA 60260 CUBA	0.00	0.00	0.00	359.00	359.00 USD	No
	Date Filed:	8/25/2020								
4	565008700	No	Aerolitoral, S.A.	AGENCIA WARREN SRL DE CV COSTADO SUR DE HONDUCOR MDCPO BOX 30213 COMAYAGUELA SAN PEDRO SULA 504 HONDURAS	0.00	0.00	0.00	14,973.03	14,973.03 USD	No
	Date Filed:	8/25/2020								
5	561011550	No	Aerovías de México, S.A. de C.V.	ALVARADO MARTINEZ JUAN LUIS SANTA INES 120 CERRO LARRAIN VALPARAISO VALPARAISO CHILE	0.00	0.00	0.00	813.41	813.41 USD	No
	Date Filed:	8/25/2020								
6	566001490	No	Aerovias Empresa de Cargo, S.A. de C.V.	AMERICA CARGO GSA INC 300 MERRICK ROAD SUITE 308 LYNNBROOK NY 11563 USA	0.00	0.00	0.00	101,672.38	101,672.38 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
7	561015290	No	Aerovías de México, S.A. de C.V.	AUDIOWEBCONFERENCING SA DE CV PRESA LA ANGOSTURA 116 IRRIGACIÓN PRESA SANTA ROSA Y PRESA LAS PILAS MIGUEL HIDALGO DISTRITO FEDERAL 1150 MEXICO	0.00	0.00	0.00	23,801.40	23,801.40 USD	No
	Date Filed:	8/25/2020								
8	565009860	No	Aerolitoral, S.A.	AUTOTRANSPORTACIONES DE AEROPUERTOS DE MAZATLAN SA DE CV TENOCHTITLAN NO 100 LOPEZ MATEOS MAZATLAN SINALOA 82140 MEXICO	0.00	0.00	0.00	6,542.84	6,542.84 USD	No
	Date Filed:	8/25/2020								
9	13448	No	Aerolitoral, S.A.	BANCO SANTANDER MEXICO SA AS AGENT ATTN GABRIEL PEREZ RIOS AGUILAR PROLONGACION PASEO DE LA REFORMA 500 MODULO 208 CIUDAD DE MÉXICO ZC 01219 MEXICO	0.00	0.00	0.00	33,232,248.00	33,232,248.00 USD	Yes
	Date Filed:	1/13/2021								
10	13452	No	Grupo Aeroméxico, S.A.B. de C.V.	BANCO SANTANDER MEXICO SA AS AGENT ATTN GABRIEL PEREZ RIOS AGUILAR PROLONGACION PASEO DE LA REFORMA 500 MODULO 208 CIUDAD DE MEXICO ZC 01219 MEXICO	0.00	0.00	0.00	33,232,248.00	33,232,248.00 USD	Yes
	Date Filed:	1/13/2021								
11	13455	No	Aerovías de México, S.A. de C.V.	BANCO SANTANDER MEXICO SA AS AGENT ATTN GABRIEL PEREZ RIOS AGUILAR PROLONGACION PASEO DE LA REFORMA 500 MODULO 208 CIUDAD DE MEXICO ZC 01219 MEXICO	0.00	0.00	0.00	33,232,248.00	33,232,248.00 USD	Yes
	Date Filed:	1/13/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
12	14822	No	Aerolitoral, S.A.	BEXAR COUNTY TAX ASSESSOR COLLECTOR C/O LINEBARGER GOGGAN BLAIR & SAMPSON 112 E PECAN ST, STE 2200 SAN ANTONIO 78205	131.86	0.00	0.00	0.00	131.86 USD	No
	Date Filed:	3/17/2021								
13	561018980	No	Aerovías de México, S.A. de C.V.	BH CATERING SERVICES SARL STRATEGIC PARC 1 RUE DU GUE LE MESNIL AMELOT FRANCIA 77990 FRANCE	0.00	0.00	0.00	15,850.17	15,850.17 USD	No
	Date Filed:	8/25/2020								
14	11929	No	Aerovías Empresa de Cargo, S.A. de C.V.	CHAMP CARGOSYSTEMS GMBH C/O CHAMP CARGOSYSTEMS SA 2 RUE EDMOND REUTER CONTERN L 5326 LUXEMBOURG	0.00	0.00	0.00	44,000.00	44,000.00 EUR	No
	Date Filed:	1/6/2021								
15	20046	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	26,181.76	26,181.76 USD	No
	Date Filed:	11/6/2020								
16	20047	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	7,830.18	7,830.18 USD	No
	Date Filed:	11/6/2020								
17	20048	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	894.27	894.27 USD	No
	Date Filed:	11/6/2020								
18	20049	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	17,814.02	17,814.02 USD	No
	Date Filed:	11/6/2020								
19	20050	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	894.98	894.98 USD	No
	Date Filed:	11/6/2020								
20	20051	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	17,114.38	17,114.38 USD	No
	Date Filed:	11/6/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
21	20052	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	900.37	900.37 USD	No
	Date Filed:	11/6/2020								
22	20053	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	19,855.99	19,855.99 USD	No
	Date Filed:	11/6/2020								
23	20054	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	908.18	908.18 USD	No
	Date Filed:	11/6/2020								
24	20055	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	2,412.00	2,412.00 USD	No
	Date Filed:	11/6/2020								
25	20056	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	64.02	64.02 USD	No
	Date Filed:	11/6/2020								
26	20057	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	160.05	160.05 USD	No
	Date Filed:	11/6/2020								
27	20058	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	3,239.41	3,239.41 USD	No
	Date Filed:	11/6/2020								
28	20059	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	914.57	914.57 USD	No
	Date Filed:	11/6/2020								
29	20060	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	20,400.95	20,400.95 USD	No
	Date Filed:	11/6/2020								
30	20061	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	1,614.54	1,614.54 USD	No
	Date Filed:	11/6/2020								
31	20062	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	59.76	59.76 USD	No
	Date Filed:	11/6/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
32	20063	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA BA 1003 ARGENTINA	0.00	0.00	0.00	149.40	149.40 USD	No
Date Filed:	11/6/2020									
33	20064	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	1,880.95	1,880.95 USD	No
Date Filed:	11/6/2020									
34	20065	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	995.62	995.62 USD	No
Date Filed:	11/6/2020									
35	20066	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	19.87	19.87 USD	No
Date Filed:	11/6/2020									
36	20067	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	23,147.42	23,147.42 USD	No
Date Filed:	11/6/2020									
37	20068	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	4,691.41	4,691.41 USD	No
Date Filed:	11/6/2020									
38	20069	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	9.90	9.90 USD	No
Date Filed:	11/6/2020									
39	20070	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	24.75	24.75 USD	No
Date Filed:	11/6/2020									
40	20071	No	Aerovías de México, S.A. de C.V.	CHIEMESE SA RECONQUISTA 737, 2ND FL D CABA, BA 1003 ARGENTINA	0.00	0.00	0.00	135.10	135.10 USD	No
Date Filed:	11/6/2020									

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
41	14043	No	Aerovías de México, S.A. de C.V.	CIBANCO SA, AS TRUSTEE FOR NO F/1930 ATTN ALONSO ROJAS DINGLER CORDILLERA DE LOS ANDES 265 PISO 3. COL. LOMAS DE CHAPULTEPEC CIUDAD DE MÉXICO 11000 MEXICO	0.00	0.00	0.00	33,138,800.70	33,138,800.70 USD	Yes
	Date Filed:	1/14/2021								
42	13411	No	Aerovías de México, S.A. de C.V.	CLARK COUNTY, NEVADA C/O TYLER MCHENRY PO BOX 11005 LAS VEGAS NV 89111	0.00	0.00	0.00	194,718.33	194,718.33 USD	No
	Date Filed:	1/13/2021								
43	561029570	No	Aerovías de México, S.A. de C.V.	DALLAS FORT WORTH INTERNATIONAL AIRPORT P.O. BOX 974551 DALLAS TX 75397-4551 USA	0.00	0.00	0.00	6,997.52	6,997.52 USD	No
	Date Filed:	8/25/2020								
44	561032230	No	Aerovías de México, S.A. de C.V.	DIMERC PERU SAC ALBERTO PEPPER 1784 RENCA SANTIAGO REGION METROPOLITANA 8640000 CHILE	0.00	0.00	0.00	120.14	120.14 USD	No
	Date Filed:	8/25/2020								
45	561032370	No	Aerovías de México, S.A. de C.V.	DIRECCION GENERAL DE MIGRACION 30 DE MAYO ESQUINA HEROES DE LUPERON DISTRITO NACIONAL SANTO DOMINGO DOMINICAN REPUBLIC	0.00	0.00	0.00	1,649.78	1,649.78 USD	No
	Date Filed:	8/25/2020								
46	566004080	No	Aerovias Empresa de Cargo, S.A. de C.V.	ECS GENERAL AIRLINE SERVICES S L CENTRO DE CARGA AEREA EDIFICIO DE SERVICIOS GENERALES SL AEROPUERTO DE BARAJAS MADRID MADRID 28042 SPAIN	0.00	0.00	0.00	104,066.87	104,066.87 USD	No
	Date Filed:	8/25/2020								
47	561033600	No	Aerovías de México, S.A. de C.V.	EDENRED FRANCE SAS 166 180 BOULEVARD GABRIEL PERL MALAKOFF CEDEX FRACIA 92240 FRANCE	0.00	0.00	0.00	2,962.05	2,962.05 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
48	13044	No	Aerovías de México, S.A. de C.V.	EGENCIA LLC ATTN JULIA KYSE 1111 EXPEDIA GROUP WAY W SEATTLE WA 98119	0.00	0.00	0.00	66,617.74	66,617.74 USD	No
	Date Filed:	1/12/2021								
49	561034630	No	Aerovías de México, S.A. de C.V.	ENSAYOS NO DESTRUCTIVOS SA DE CV AV 517 80 SAN JUAN DE ARAGON PRIMERA SECCION DISTRITO FEDERAL DISTRITO FEDERAL 99999 MEXICO	0.00	0.00	0.00	477.48	477.48 USD	No
	Date Filed:	8/25/2020								
50	566004200	No	Aerovias Empresa de Cargo, S.A. de C.V.	ENVIPAK SA DE CV BOULEVARD LAS PALMAS MANZANA HLT 1-A TUXTLA GUTIERREZ CHIAPAS 29045 USA	0.00	0.00	0.00	20,721.38	20,721.38 USD	No
	Date Filed:	8/25/2020								
51	561036990	No	Aerovías de México, S.A. de C.V.	EVERGREEN SHIPPING AGENCY MEXICO AV BENJAMIN FRANKLIN 204 PRIMER PISO ESCANDON MIGUEL HIDALGO CDMX 11800 MEXICO	0.00	0.00	0.00	213.87	213.87 USD	No
	Date Filed:	8/25/2020								
52	14613	No	Grupo Aeroméxico, S.A.B. de C.V.	FRESNO COUNTY TAX COLLECTOR PO BOX 1192 FRESNO CA 93715	0.00	0.00	0.00	3,761.84	3,761.84 USD	No
	Date Filed:	1/15/2021								
53	566004990	No	Aerovias Empresa de Cargo, S.A. de C.V.	GLOBE AIR CARGO BV AALSMEERDERWEG 604 ROZENBURG SCHIPHOL 1437EJ THE NETHERLANDS	0.00	0.00	0.00	122,297.23	122,297.23 USD	No
	Date Filed:	8/25/2020								
54	566005000	No	Aerovias Empresa de Cargo, S.A. de C.V.	GLOBE AIR CARGO BV WALDECKER STR 9 MOERFELDEN WALLDORF FRANKFURT GERMANY	0.00	0.00	0.00	42,758.24	42,758.24 USD	No
	Date Filed:	8/25/2020								
55	566005010	No	Aerovias Empresa de Cargo, S.A. de C.V.	GLOBE AIR CARGO BV UNIT 1 2 WESTPOINT NORTHUMBERLAND CLOSE ST ANWELL MIDDLESEX TW19 7LN GREAT BRITAIN	0.00	0.00	0.00	126.20	126.20 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
56	566005090	No	Aerovías Empresa de Cargo, S.A. de C.V.	GOBIERNO DEL ESTADO DE MEXICO AV LERDO PONIENTE 300 CENTRO TOLUCA MEXICO 50000 MEXICO	0.00	0.00	0.00	175.49	175.49 USD	No
	Date Filed:	8/25/2020								
57	20125	No	Aerovías de México, S.A. de C.V.	GRUPO DE INGENIERIA INST Y MANTTO SA CV CALLE DONIZETTINO 183 COLONIA VALLEJO CIUDAD DE MÉXICO, 07870 MÉXICO	0.00	0.00	0.00	64,874.05	64,874.05 USD	No
	Date Filed:	12/17/2020								
58	566005330	No	Aerovías Empresa de Cargo, S.A. de C.V.	GRUPO DE INTERCAMBIO COMERCIAL SA DE CV AV PATRIOTISMO 201 PISO 2 SAN PEDRO DE LOS PINOS BENITO JUAREZ CDMX 3800 MEXICO	0.00	0.00	0.00	2,856.00	2,856.00 USD	No
	Date Filed:	8/25/2020								
59	566005490	No	Aerovías Empresa de Cargo, S.A. de C.V.	HENCO GLOBAL SA DE CV LEONA VICARIO N21 EMILIANO ZAPATA MEXICO DISTRITO FEDERAL 64390 MEXICO	0.00	0.00	0.00	236.00	236.00 USD	No
	Date Filed:	8/25/2020								
60	10223	No	Aerovías de México, S.A. de C.V.	INFLIGHT LOGISTICS LLC 1020 ELDEN ST, STE 201 HERNDON VA 20170	0.00	0.00	0.00	28,775.00	28,775.00 USD	No
	Date Filed:	9/10/2020								
61	561057130	No	Aerovías de México, S.A. de C.V.	INGERSOLL RAND SA DE CV BLVD CENTRO INDUSTRIAL NO 11 INDUSTRIAL PUENTE DE VIGAS TLANEPANTLA MEXICO 54070 MEXICO	0.00	0.00	0.00	18,498.48	18,498.48 USD	No
	Date Filed:	8/25/2020								
62	561057440	No	Aerovías de México, S.A. de C.V.	INSTITUTO COSTARRICENSE DE ELECTRICIDAD 100 NORTE DE RACSA SAN JOSE SAN JOSE COSTA RICA	0.00	0.00	0.00	64.33	64.33 USD	No
	Date Filed:	8/25/2020								
63	561057460	No	Aerovías de México, S.A. de C.V.	INSTITUTO COSTARRICENSE DE TURISMO ICT 300 SUR DE POZUELO LA URUCA SAN JOSE COSTA RICA	0.00	0.00	0.00	20,186.66	20,186.66 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
64	561058450	No	Aerovías de México, S.A. de C.V.	INVERSIONES FISA SA AVENIDA ELMER FAUCETT SN CALLAO ATTO JORGE CHAVEZ ZONA INTER DUTY FREE LIMA LIMA PERU	0.00	0.00	0.00	19,813.44	19,813.44 USD	No
	Date Filed:	8/25/2020								
65	561062950	No	Aerovías de México, S.A. de C.V.	KANAY SAC AV PASEO DE LA REPUBLICA 5895 DPT 9 INT 902 MIRAFLORES LIMA PERU	0.00	0.00	0.00	2,243.39	2,243.39 USD	No
	Date Filed:	8/25/2020								
66	561063830	No	Aerovías de México, S.A. de C.V.	KT SERVICIO ANAYA SA DE CV PUEBLA 69 PEÑON DE LOS BANOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	19,309.58	19,309.58 USD	No
	Date Filed:	8/25/2020								
67	566006560	No	Aerovías Empresa de Cargo, S.A. de C.V.	KT SERVICIO ANAYA SA DE CV PUEBLA 69 PEÑON DE LOS BANOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	30,094.38	30,094.38 USD	No
	Date Filed:	8/25/2020								
68	565017830	No	Aerolitoral, S.A.	KUEHNE + NAGEL SA DE CV AVENIDA PERIFERICO SUR 4118 3ER PISO JARDINES DEL PEDREGAL ALVARO OBREGON CDMX 1001 MEXICO	0.00	0.00	0.00	776.12	776.12 USD	No
	Date Filed:	8/25/2020								
69	561064380	No	Aerovías de México, S.A. de C.V.	LB HILLINGDON REVENUES & BENEFITS SERVICES PO BOX 531 SALE LONDRES M33 0FQ GREAT BRITAIN	0.00	0.00	0.00	25,734.81	25,734.81 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
70	561065840	No	Aerovías de México, S.A. de C.V.	LUFTHANSA CARGO SERVICIOS LOGISTICOS SA DE CV PASEO DE LAS PALMAS 230 INT 101 LOMAS DE CHAPULTEPEC MIGUEL HIDALDO CDMX 11000 MEXICO	0.00	0.00	0.00	20,567.61	20,567.61 USD	No
	Date Filed:	8/25/2020								
71	565018230	No	Aerolitoral, S.A.	LUFTHANSA CARGO SERVICIOS LOGISTICOS SA DE CV PASEO DE LAS PALMAS 230 INT 101 LOMAS DE CHAPULTEPEC MIGUEL HIDALDO CDMX 11000 MEXICO	0.00	0.00	0.00	7,289.75	7,289.75 USD	No
	Date Filed:	8/25/2020								
72	10078	No	Aerovías de México, S.A. de C.V.	MARTINEZ, DONATO SANCHEZ AV BRASILIA 20 MANZANA 41 TAPACHULA, 07 30798 MÉXICO	0.00	0.00	0.00	2,400.00	2,400.00 USD	No
	Date Filed:	7/30/2020								
73	566007490	No	Aerovías Empresa de Cargo, S.A. de C.V.	MULTISERVICIOS INTEGRALES AL COMERCIO EXTERIOR SC RIO MEDIO 566 LOMAS DE RIO MEDIO VERACRUZ VERACRUZ 91809 MEXICO	0.00	0.00	0.00	694.62	694.62 USD	No
	Date Filed:	8/25/2020								
74	566007740	No	Aerovías Empresa de Cargo, S.A. de C.V.	NIDEC MOBILITY MEXICO S DE RL DE CV AV PARAISO 344 LAS COLINAS SILAO DE LA VICTORIA GUANAJUATO 36270 MEXICO	0.00	0.00	0.00	103.00	103.00 USD	No
	Date Filed:	8/25/2020								
75	561077130	No	Aerovías de México, S.A. de C.V.	OPERADORA DE CENTROS DE ESPECTACULOS SA DE CV AV RIO CHURUBUSCO Y AÑIL GRANJAS MEXICO IZTACALCO CDMX 8400 MEXICO	0.00	0.00	0.00	502,396.00	502,396.00 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
76	565021190	No	Aerolitoral, S.A.	ORGANISMO INTERNACIONAL REGIONAL DE SANIDAD AGROPECUARIA 2DA ENTRADA LAS COLINAS DE LA IGLESIA CATOLICA MANAGUA NICARAGUA	0.00	0.00	0.00	77.88	77.88 USD	No
	Date Filed:	8/25/2020								
77	561081290	No	Aerovías de México, S.A. de C.V.	ORTIZ MORENO JOSE LUIS JUSTO SIERRA MZ 7 LT 2 CALZADA DE JALALPA ALVARO OBREGON CDMX 1260 MEXICO	0.00	0.00	0.00	45,993.46	45,993.46 USD	No
	Date Filed:	8/25/2020								
78	561082040	No	Aerovías de México, S.A. de C.V.	PARKLAND REFINING BC LTD 745 THURLOW STREET SUITE 2400 VANCOUVER BC V6E 0C5 CANADA	0.00	0.00	0.00	28,040.81	28,040.81 USD	No
	Date Filed:	8/25/2020								
79	14010	No	Grupo Aeroméxico, S.A.B. de C.V.	PREFERRED AVIATION INC 1790 NW 82ND AVE DORAL FL 33126	0.00	0.00	0.00	0.00	0.00 USD	Yes
	Date Filed:	1/14/2021								
80	561083260	No	Aerovías de México, S.A. de C.V.	PREFERRED AVIATION INC 8470 NW 61ST STREET MIAMI FLORIDA 33166 USA	0.00	0.00	0.00	48,730.50	48,730.50 USD	No
	Date Filed:	8/25/2020								
81	561083580	No	Aerovías de México, S.A. de C.V.	PRODUCTOS INNOVADOR SA DE CV BODEGA 9 KM 31 5 CARR MEXICO CUAUTITLAN CONJUNTO INDUSTRIAL CUAUTITLAN CUAUTITLAN MEXICO 54800 MEXICO	0.00	0.00	0.00	13,358.28	13,358.28 USD	No
	Date Filed:	8/25/2020								
82	561083740	No	Aerovías de México, S.A. de C.V.	PROMOTORA DE COMERCIO EXTERIOR MARVI SA DE CV AVENIDA 602 SN LOCAL 1B EDIFICIO AGENTES ADUANALES PEÑON DE LOS BAÑOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	335.42	335.42 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
83	565021650	No	Aerolitoral, S.A.	PROMOTORA DE COMERCIO EXTERIOR MARVI SA DE CV AVENIDA 602 SN LOCAL 1B EDIFICIO AGENTES ADUANALES PEÑON DE LOS BAÑOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	454.95	454.95 USD	No
	Date Filed:	8/25/2020								
84	10091	No	Aerovías de México, S.A. de C.V.	PROMOTORA TURISTICA KAN PEACH SA DE CV PROLONGACION PASEO DE LA REFORMA 1015 PISO 9 TORRE A SANTA FE CDMX 05348 MEXICO	0.00	0.00	0.00	4,106.40	4,106.40 MXN	No
	Date Filed:	7/31/2020								
85	20078	No	Aerolitoral, S.A.	PROYECTOS PROCAR SAPI DE CV AVENIDA ISLA DE TRIS 28 A KM 5 FRACCIONAMIENTO SAN MIGUEL CIUDAD DEL CARMEN 24157 MEXICO	0.00	0.00	0.00	2,330.92	2,330.92 USD	No
	Date Filed:	11/25/2020								
86	561087420	No	Aerovías de México, S.A. de C.V.	ROMINA OSORES ROJO LAS MARGARITAS 150 CASUARINA SURCO LIMA LIMA PERU	0.00	0.00	0.00	257.36	257.36 USD	No
	Date Filed:	8/25/2020								
87	14072	No	Grupo Aeroméxico, S.A.B. de C.V.	RUNWAY PDP LENDER ONE LLC C/O CARLYLE AVIATION MANAGEMENT LTD ATTN RUNWAY PDP AGENT CONNAUGHT HOUSE, 1 BURLINGTON ROAD DUBLIN 4 IRELAND	0.00	0.00	0.00	61,923,605.00	61,923,605.00 USD	No
	Date Filed:	1/14/2021								
88	14075	No	Aerovías de México, S.A. de C.V.	RUNWAY PDP LENDER ONE LLC C/O CARLYLE AVIATION MANAGEMENT LTD ATTN RUNWAY PDP AGENT CONNAUGHT HOUSE, 1 BURLINGTON ROAD DUBLIN 4 IRELAND	0.00	0.00	0.00	61,923,605.00	61,923,605.00 USD	Yes
	Date Filed:	1/14/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
89	14086	No	Aerovías Empresa de Cargo, S.A. de C.V.	RUNWAY PDP LENDER ONE LLC C/O CARLYLE AVIATION MANAGEMENT LTD ATTN RUNWAY PDP AGENT CONNAUGHT HOUSE, 1 BURLINGTON ROAD DUBLIN 4 IRELAND	0.00	0.00	0.00	0.00	0.00 USD	Yes
	Date Filed:	1/14/2021								
90	14092	No	Aerolitoral, S.A.	RUNWAY PDP LENDER ONE LLC C/O CARLYLE AVIATION MANAGEMENT LTD ATTN RUNWAY PDP AGENT CONNAUGHT HOUSE, 1 BURLINGTON ROAD DUBLIN 4 IRELAND	0.00	0.00	0.00	0.00	0.00 USD	Yes
	Date Filed:	1/14/2021								
91	565022830	No	Aerolitoral, S.A.	SALOMON CAMARA ROMELIA DEL CARMEN AV ISLA DE TRIS 103 A FRANCISCO I MADERO CIUDAD DEL CARMEN CAMPECHE 24190 MEXICO	0.00	0.00	0.00	75.79	75.79 USD	No
	Date Filed:	8/25/2020								
92	566008880	No	Aerovías Empresa de Cargo, S.A. de C.V.	SANCHEZ MARTINEZ DONATO BRASILIA 20 BUENOS AIRES III TAPACHULA CHIAPAS 30798	0.00	0.00	0.00	120.58	120.58 USD	No
	Date Filed:	8/25/2020								
93	561089760	No	Aerovías de México, S.A. de C.V.	SCHIPHOL NEDERLAND BV BUSINESS AREA AVIATION PO BOX 7501 POSTLOC 99 99 SCHIPHOL AMSTERDAM 1118 GREAT BRITAIN	0.00	0.00	0.00	57,293.40	57,293.40 USD	No
	Date Filed:	8/25/2020								
94	566009050	No	Aerovías Empresa de Cargo, S.A. de C.V.	SECRETARIA DE ADMINISTRACION Y FINANZAS GOBIERNO DEL ESTADO DE SINALOA INSURGENTES S/N CENTRO SINALOA SINALOA 80129 MEXICO	0.00	0.00	0.00	460.30	460.30 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
95	566009080	No	Aerovías Empresa de Cargo, S.A. de C.V.	SECRETARIA DE FINANZAS DEL GOBIERNO DEL ESTADO BAJA CALIFORNIA SUR ISABEL LA CATOLICA Y ALLENDE CENTRO LA PAZ BAJA CALIFORNIA SUR 23000 MEXICO	0.00	0.00	0.00	171.42	171.42 USD	No
	Date Filed:	8/25/2020								
96	566009130	No	Aerovías Empresa de Cargo, S.A. de C.V.	SECRETARIA DE FINANZAS Y TESORERIA GENERAL DEL ESTADO NUEVO LEON ESCOBEDO SUR 333 PISO 3 CENTRO MONTERREY NUEVO LEON 64000 MEXICO	0.00	0.00	0.00	394.81	394.81 USD	No
	Date Filed:	8/25/2020								
97	561090190	No	Aerovías de México, S.A. de C.V.	SECRETARIA DE PLANEACION Y FINANZAS DEL ESTADO DE JALISCO PEDRO MORENO NO 281 CENTRO GUADALAJARA JALISCO 44100 MEXICO	0.00	0.00	0.00	95.76	95.76 USD	No
	Date Filed:	8/25/2020								
98	566009260	No	Aerovías Empresa de Cargo, S.A. de C.V.	SENATOR LOGISTICS SA DE CV MONTECITO N38 PISO 17 OF 09 NAPOLES DISTRITO FEDERAL DISTRITO FEDERAL 15520 MEXICO	0.00	0.00	0.00	154.00	154.00 USD	No
	Date Filed:	8/25/2020								
99	561090430	No	Aerovías de México, S.A. de C.V.	SERVICIO DE MEDICION CONTROL SA DE CV LUIS MOYA 76 LOCAL A CENTRO DE LA CIUDAD DE MEXICO AREA 7 CUAUHTEMOC CDMX 6070 MEXICO	0.00	0.00	0.00	5,370.06	5,370.06 USD	No
	Date Filed:	8/25/2020								
100	561094040	No	Aerovías de México, S.A. de C.V.	SOFTBANK CORP SHIN-KOKUSAI BLDG 8F 3-4-1 MARUNOUCHI CHIYODA-KU TOKYO 100-0005 JAPAN	0.00	0.00	0.00	94.14	94.14 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
101	561095930	No	Aerovías de México, S.A. de C.V.	TALMA MEXICO SERVICIOS AEROPORTUARIOS SA DE CV CAMINO ASA EDIFICIO NC 46 ZONA DE AGENCIAS ADUANALES AICM PENON DE LOS BANOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	710.81	710.81 USD	No
	Date Filed:	8/25/2020								
102	561095960	No	Aerovías de México, S.A. de C.V.	TALMA SERVICIOS DE CARGA SA DE CV CAMINO ASA EDIFICIO NC 46 ZONA DE AGENCIAS ADUANALES AICM PEÑON DE LOS BAÑOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	20,444.58	20,444.58 USD	No
	Date Filed:	8/25/2020								
103	565024310	No	Aerolitoral, S.A.	TALMA SERVICIOS DE CARGA SA DE CV CAMINO ASA EDIFICIO NC 46 ZONA DE AGENCIAS ADUANALES AICM PEÑON DE LOS BAÑOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	3,535.46	3,535.46 USD	No
	Date Filed:	8/25/2020								
104	561097040	No	Aerovías de México, S.A. de C.V.	TIANDA CHILE SPA ARRAYAN 2750 OFICINA 802 PROVIDENCIA SANTIAGO SANTIAGO CHILE	0.00	0.00	0.00	1,027.19	1,027.19 USD	No
	Date Filed:	8/25/2020								
105	561097200	No	Aerovías de México, S.A. de C.V.	TOKYO CHIYODA TOZEI JIMISHO SHIN KOKUSAI BLDG 8F 3-4-1 MARUNDUCHI JAPON JAPAN	0.00	0.00	0.00	197.69	197.69 USD	No
	Date Filed:	8/25/2020								
106	561097710	No	Aerovías de México, S.A. de C.V.	TRAVEL EXCELLENCE CORPORATION 4TH FLOOR ROOM 421 PENINSULA COURT BLDG 8735 PASEO DE ROXAS CORNER MAKATI AVENUE MAKATI CITY MAKATI CITY 1226 PHILIPPINES	0.00	0.00	0.00	1,479.49	1,479.49 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
107	565025070	No	Aerolitoral, S.A.	VEGA CELORIO PEDRO ANTONIO AV 31 SN AVIACION CIUDAD DEL CARMEN CAMPECHE 24190 MEXICO	0.00	0.00	0.00	94.85	94.85 USD	No
	Date Filed:	8/25/2020								
108	561100370	No	Aerovías de México, S.A. de C.V.	VODAFONE ESPAÑA SAU FAO JOANNA DAVIES 1 KINGDOM STREET LONDON LONDON W26BY GREAT BRITAIN	0.00	0.00	0.00	1,184.90	1,184.90 USD	No
	Date Filed:	8/25/2020								
109	561101050	No	Aerovías de México, S.A. de C.V.	WELLS FARGO BANK N A 401 LINDEN STREET 1ST FLOOR WINSTON SALEM NC 27101 USA	0.00	0.00	0.00	5,368.87	5,368.87 USD	No
	Date Filed:	8/25/2020								
110	14439	No	Aerovías de México, S.A. de C.V.	WORLDWIDE FLIGHT SERVICES INC C/O WORLDWIDE FLIGHT SERVICES INC ATTN BARON T OURSLER, SVP/GEN COUNSEL 1639 W 23RD ST, STE 240 DALLAS TX 75261	0.00	0.00	0.00	54,000.00	54,000.00 USD	No
	Date Filed:	8/26/2020								
Satisfied Claim Totals			Count:	USD	108	131.86	0.00	0.00	258,579,926.02	258,580,057.88
				EUR	1	0.00	0.00	0.00	44,000.00	44,000.00
				MXN	1	0.00	0.00	0.00	4,106.40	4,106.40

Schedule 6

- (a) Amended Claims**
- (b) Duplicate Claims**

Amended Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	
1	14798	No	Aerovías de México, S.A. de C.V.	ARTICULOS INNOVADORES LEO SA DE CV CAFETAL 368 COL GRANJAS MEXICO IZTACALCO CIUDAD DE MEXICO MX 08400, MEXICO	0.00	0.00	0.00	78,998.40	78,998.40 MXN	No	
	Date Filed:	3/2/2021									
	Surviving Claim:	14914	No	Aerolitoral, S.A.	ARTICULOS INNOVADORES LEO SA DE CV CAFETAL 368 COL GRANJAS MEXICO IZTACALCO CIUDAD DE MEXICO MX 08400, MEXICO	0.00	0.00	0.00	2,122.13	2,122.13 USD	Yes
	Date Filed:	8/20/2021									
2	14056	No	Aerovías de México, S.A. de C.V.	COMMUTER AIRCRAFT LEASING 2017 V LTD COMMUTER AIRCRAFT LEASING 2017 V LIMITED 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE DUBLIN DO1 P767, IRELAND	1,053,177.00	0.00	0.00	0.00	1,053,177.00 USD	No	
	Date Filed:	1/14/2021									
	Surviving Claim:	14892	No	Aerovías de México, S.A. de C.V.	COMMUTER AIRCRAFT LEASING 2017 V LTD 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE ABBNEY STREET LOWER DUBLIN DO1 P767, IRELAND	0.00	0.00	0.00	7,762,734.00	7,762,734.00 USD	No
	Date Filed:	8/13/2021									
3	14069	No	Aerolitoral, S.A.	COMMUTER AIRCRAFT LEASING 2017 V LTD 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE ABBNEY STREET LOWER DUBLIN DO1 P767, IRELAND	1,053,177.00	0.00	0.00	0.00	1,053,177.00 USD	No	
	Date Filed:	1/14/2021									
	Surviving Claim:	14890	No	Aerolitoral, S.A.	COMMUTER AIRCRAFT LEASING 2017 V LTD 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE ABBNEY STREET LOWER DUBLIN DO1 P767, IRELAND	0.00	0.00	0.00	7,762,734.00	7,762,734.00 USD	No
	Date Filed:	8/13/2021									

*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).

Amended Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total (*)	Unliquidated	
4	14048	No	Aerovías de México, S.A. de C.V.	COMMUTER AIRCRAFT LEASING 2017 VI LTD COMMUTER AIRCRAFT LEASING 2017 V LIMITED 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE DUBLIN DO1 P767, IRELAND	1,619,160.00	0.00	0.00	0.00	1,619,160.00 USD	No	
	Date Filed:	1/14/2021									
	Surviving Claim:	14893	No	Aerovías de México, S.A. de C.V.	COMMUTER AIRCRAFT LEASING 2017 VI LTD 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE ABBAY STREET LOWER DUBLIN DO1 P767, IRELAND	0.00	0.00	0.00	6,993,471.00	6,993,471.00 USD	No
	Date Filed:	8/13/2021									
5	14067	No	Aerolitoral, S.A.	COMMUTER AIRCRAFT LEASING 2017 VI LTD 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE DUBLIN DO1 P767, IRELAND	1,619,160.00	0.00	0.00	0.00	1,619,160.00 USD	No	
	Date Filed:	1/14/2021									
	Surviving Claim:	14891	No	Aerolitoral, S.A.	COMMUTER AIRCRAFT LEASING 2017 VI LTD 2ND FLOOR BLOCK 5 IRISH LIFE CENTRE ABBAY STREET LOWER DUBLIN DO1 P767, IRELAND	0.00	0.00	0.00	6,993,471.00	6,993,471.00 USD	No
	Date Filed:	8/13/2021									
6	20552	No	Aerovías de México, S.A. de C.V.	SKATT ASESORES FISCALES SC AV. SANTA FE #428 TORRE III PISO 20 INT 2001, LOMAS DE SANTA FE CUAJIMALPA DE MORELOS CIUDAD DE MÉXICO DF 05300, MÉXICO	0.00	841,000.00	0.00		841,000.00 MXN	Yes	
	Date Filed:	9/8/2021									
	Surviving Claim:	20554	No	Aerovías de México, S.A. de C.V.	SKATT ASESORES FISCALES SC AV. SANTA FE #428 TORRE III PISO 20 INT 2001, LOMAS DE SANTA FE CUAJIMALPA DE MORELOS CIUDAD DE MÉXICO DF 05300, MÉXICO	0.00	36,423.79	0.00	0.00	36,423.79 USD	Yes
	Date Filed:	9/23/2021									
Amended Claims Total			Count:	USD MXN	4 2	5,344,674.00 0.00	0.00 841,000.00	0.00 0.00	0.00 78,998.40	5,344,674.00 919,998.40	

Duplicate Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
1	104	No	Grupo Aeroméxico, S.A.B. de C.V.	WELLS FARGO FINANCIAL LEASING INC 800 WALNUT ST, MAC F0005-055 DES MOINES, IA 50309	0.00	0.00	0.00	87,858.82	87,858.82 USD	No	
	Date Filed:	10/5/2020									
	Surviving Claim:	10293	No	Aerovías de México, S.A. de C.V.	WELLS FARGO EQUIPMENT FINANCE INC ATTN KIMBERLY PARK 800 WALNUT ST DES MOINES, IA 50309	0.00	0.00	0.00	87,858.82	87,858.82 USD	No
	Date Filed:	11/10/2020									
2	103	No	Grupo Aeroméxico, S.A.B. de C.V.	WELLS FARGO VENDOR FINANCIAL SERV LLC 1010 THOMAS EDISON BLVD SW CEDAR RAPIDS, IA 52404	0.00	0.00	0.00	7,972.17	7,972.17 USD	Yes	
	Date Filed:	10/5/2020									
	Surviving Claim:	10294	No	Aerovías de México, S.A. de C.V.	WELLS FARGO VENDOR FINANCIAL SERVICES LL ATTN KIMBERLY PARK 1010 THOMAS EDISON BLVD SW CEDAR RAPIDS, IA 52404	0.00	0.00	0.00	7,972.17	7,972.17 USD	No
	Date Filed:	11/10/2020									
Amended Claims Total			Count:	USD	2	0.00	0.00	0.00	95,830.99	95,830.99	

Schedule 7

- (a) Reduced Claims**
- (b) Reduced and Wrong Debtor Claim**
- (c) Reduced, Incorrectly Classified, and Misclassified Unliquidated Claim**

Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	14215	No	Aerovías de México, S.A. de C.V.	BOEING COMPANY, THE C/O PERKINS COIE LLP ATTN JOHN PENN 500 N AKARD ST, STE 300 DALLAS, TX 75201 USA	0.00	6,098.00	0.00	185,012,752.57	185,018,850.57 USD	No	See footnote. ¹
	Date Filed:	1/20/2021									
	Reduced Claim:	14215			0.00	6,098.00	0.00	8,213,027.57	8,219,125.57 USD	No	
2	13931	No	Aerovías de México, S.A. de C.V.	ENTSERV ENTERPRISE SERV MEXICO SDERLDECV C/O ECKERT SEAMANS CHERIN & MELLOTT LLC ATTN CHRISTOPHER L PERKINS, ESQ 919 E MAIN ST, 13TH FL RICHMOND, VA 23219	0.00	0.00	0.00	3,268,437.42	3,268,437.42 USD	No	Partially paid and conversion to USD
	Date Filed:	1/19/2021									
	Reduced Claim:	13931			0.00	0.00	0.00	3,011,628.60	3,011,628.60 USD	No	
3	14622	No	Aerovías de México, S.A. de C.V.	ROCKWELL COLLINS INC C/O COLLINS AEROSPACE ATTN DAWN M SAVARESE 2730 W TYVOLARD CHARLOTTE, NC 28217	280,000.00	0.00	0.00	67,971.76	347,971.76 USD	No	Claim was reduced by pre-petition credit memo and reflects current outstanding pre-petition liability
	Date Filed:	1/20/2021									
	Reduced Claim:	14622			0.00	0.00	0.00	112,293.52	112,293.52 USD	No	
4	14532	No	Aerovías de México, S.A. de C.V.	ROHI STOFFE GMBH SCHOENLINDERSTR 1 ALEMANIA GERET SRIED 82538, GERMANY	0.00	124,080.00	0.00	74,055.26	198,135.26 USD	No	Goods were never delivered and are not entitled to administrative claim (§503(b)(9))
	Date Filed:	1/20/2021									
	Reduced Claim:	14532			0.00	0.00	0.00	74,055.26	74,055.26 USD	No	

¹ Upon the agreement of counsel to the Debtors and The Boeing Company (“**Boeing**”), this Objection consensually seeks to reduce Claim number 14215 filed by Boeing pursuant to the *Order Authorizing the Debtors To Enter into an Amended Agreement with The Boeing Company and Approval of Compromises Reflected Therein* [ECF No. 1141] entered on April 30, 2021.

Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
5	10216	No	Aerovías de México, S.A. de C.V.	SABETI WAIN AEROSPACE LTD C/O DIAMOND HOUSE 120 LN END RD SANDS, BUCKINGHAMSHIRE, HP12 4HX UNITED KINGDOM	0.00	0.00	0.00	330,312.51	330,312.51 USD	No	Claim includes invoices for services not provided and was reduced to reflect current outstanding pre-petition liability
	Date Filed:	9/30/2020									
	Reduced Claim:	10216			0.00	0.00	0.00	109,578.15	109,578.15 USD	No	
6	10190	No	Aerovías de México, S.A. de C.V.	TRAVELPRO PRODUCTS INC C/O COFACE NORTH AMERICA INSURANCE CO 650 COLLEGE RDE, STE 2005 PRINCETON, NJ 08540	0.00	0.00	0.00	214,064.40	214,064.40 USD	No	Goods were never delivered and are not entitled to administrative claim (§503(b)(9))
	Date Filed:	9/30/2020									
	Reduced Claim:	10190			0.00	0.00	0.00	87,946.00	87,946.00 USD	No	
Reduced Claims Total			Count:	USD	6	280,000.00	130,178.00	0.00	188,967,593.92	188,377,771.92	

Reduced and Wrong Debtor Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	10548	No	Grupo Aeroméxico, S.A.B. de C.V.	LAX FUEL CORPORATION C/O SHERMAN & HOWARD LLC ATTN SAM BALLINGRUD	0.00	0.00	0.00	19,290.13	19,290.13 USD	No	Reduce by pre-petition credit memos
	Date Filed: 12/18/2020										
	Reduced Claim: 10548		Aerovías de México, S.A. de C.V.	633 17TH ST, STE 3000 DENVER, CO 80202	0.00	0.00	0.00	12,340.96	12,340.96 USD	No	
Reduced and Wrong Debtor Claim Total			Count:	USD	1	0.00	0.00	0.00	19,290.13	19,290.13	

Reduced, Incorrectly Classified, and Misclassified Unliquidated Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	10116	No	Aerovías de México, S.A. de C.V.	ABASTO BASICO SA DE CV 1 3 5 Y 7 AVENIDA PRINCIPAL AREA DE ABASTO CENTRAL DE ABASTOS IZTAPALAPA CIUDAD DE MÉXICO MX, 09040 MÉXICO	0.00	4,640,463.47	0.00	0.00	4,640,463.47 MXN	Yes	Reduce by paid invoices; Only a portion of the goods were delivered within 20 days, remaining amounts are unsecured
	Date Filed:	8/1/2020									
	Reduced Claim:	10116			0.00	17,546.16	0.00	181,348.09	198,894.25 USD	No	
Reduced, Incorrectly Classified, and Misclassified Unliquidated Claim Total			Count:	MXN	1	0.00	4,640,463.47	0.00	0.00	4,640,463.47	

Schedule 8

Foreign Currency Claims

Foreign Currency Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	10219	No	Aerovías de México, S.A. de C.V.	AERO MAG 2000 YVR INC 8181 HERVEST-MARTIN SAINT-LAURENT, QC H4S 2A5 CANADA	0.00	0.00	0.00	20,416.93	20,416.93 CAD	Yes
	Date Filed:	9/9/2020								
	Modified Claim	10219			0.00	0.00	0.00	14,826.64	14,826.64 USD	Yes
2	40	No	Aerovías de México, S.A. de C.V.	NEWREST ESPANA SL ATTN EDOUARD DUCOURNEAU 61 BLVD LAZARE CARNOT TOULOUSE, 31000 FRANCE	0.00	0.00	0.00	463,547.89	463,547.89 EUR	No
	Date Filed:	8/4/2020								
	Modified Claim	40			0.00	0.00	0.00	519,590.85	519,590.85 USD	No
3	39	No	Aerovías de México, S.A. de C.V.	NEWREST TORONTO CORPORATION ATTN EDOUARD DUCOURNEAU 61 BLVD LAZARE CARNOT TOULOUSE, 31000 FRANCE	0.00	0.00	0.00	170,761.00	170,761.00 CAD	No
	Date Filed:	8/4/2020								
	Modified Claim	39			0.00	0.00	0.00	124,005.52	124,005.52 USD	No
Foreign Currency Claims Total					Count:	CAD	2	0.00	0.00	0.00
						EUR	1	0.00	0.00	0.00
								191,177.93	191,177.93	
								463,547.89	463,547.89	

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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**DECLARATION OF RICARDO JAVIER SÁNCHEZ BAKER IN SUPPORT
OF THE DEBTORS' TWENTY-FIFTH OMNIBUS CLAIMS OBJECTION TO
PROOFS OF CLAIM (MISCLASSIFIED UNLIQUIDATED, WRONG DEBTOR,
INCORRECTLY CLASSIFIED, SET AMOUNT, NO LIABILITY, AMENDED,
DUPLICATE, REDUCED, AND FOREIGN CURRENCY 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

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; 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 *Debtors' Twenty-Fifth Omnibus Claims Objection to Proofs of Claim (Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, Set Amount, No Liability, Amended, Duplicate, Reduced, and Foreign Currency 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 Records² 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

² 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) Misclassified Unliquidated Claims; (ii) Wrong Debtor Claims; (iii) Incorrectly Classified Claims; (iv) Set Amount Claiml (v) No Liability Claims; (vi) Satisfied Claims; (vii) Amended and Duplicate Claims; (viii) Reduced Claims; and/or (ix) Foreign Currency 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.

Misclassified Unliquidated 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 Misclassified Unliquidated Claim, the Debtors have determined that such Claims incorrectly indicate that all or a portion thereof are unliquidated. If the Misclassified Unliquidated Claims are not modified, the claimants identified on Schedules 1, 2(b), and 3(b) 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 the Misclassified Unliquidated Claims as set forth therein and in the Objection.

Wrong Debtor 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 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 Schedules 2, 3(c) and 7(b) 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

8. 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, in part or in full, 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 Schedules 3 and 7(c) 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.

Set Amount Claim

9. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and the Set Amount Claim, the Debtors, after analyzing the Set Amount Claim and any documentation provided therewith, the Debtors have determined that the asserted amount thereon is inconsistent with what the Debtors' reflect on their Books and Records and/or is not supported by the documentation provided by the claimant. If the Set Amount Claim is not modified, the claimant identified on Schedules 3(d) may improperly receive a recovery 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 setting the amount of the Set Amount Claim as set forth therein and in the Objection and on Schedule 3(d).

No Liability 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 No Liability Claim, the Debtors have determined that such Claims seek to recover amounts for which the Debtors are not liable. If the No Liability Claims are not disallowed and expunged, the claimants identified on Schedule 4 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 disallowing and expunging the No Liability Claims as set forth therein and in the Objection.

Satisfied 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 Satisfied Claim, the Debtors have determined that the Satisfied Claims have been paid and/or otherwise satisfied. If the Satisfied Claims are not disallowed and expunged, the claimants identified on Schedule 5 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 Satisfied Claims as set forth therein and in the Objection.

Amended and Duplicate 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 Amended and Duplicate Claim, the Debtors have determined that (i) the Amended Claims set forth on Schedule 6(a) have been amended or superseded by other Claims filed by or on behalf of the same claimants relating to the same purported liabilities and (ii) the Duplicate Claims set forth on Schedule 6(b) are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability.

13. Furthermore, for each Amended and Duplicate Claim, the Debtors have identified a Surviving Claim that asserts the same liability and is identified on Schedule 6 in the applicable row

labeled “Surviving Claim.”

14. If the Amended and Duplicate Claims identified on Schedule 6 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

15. 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 7, 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.

Foreign Currency Claims

16. 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 8 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.

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 Misclassified Unliquidated, Wrong Debtor, Incorrectly Classified, Set Amount, Reduced, and Foreign Currency Claims and (b) disallowing and/or expunging the No Liability, Satisfied, and 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: October 4, 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.¹**

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**”)² is

¹ 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.

² 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,³ 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.

³ As identified in the *Third Amended Verified Statement of the Ad Hoc Group of Senior Noteholders Pursuant to Bankruptcy Rule 2019* [ECF No. 1731].

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.