

**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)

**FIFTH SUPPLEMENTAL DECLARATION OF
LISA DONAHUE OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Lisa Donahue, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. I submit this supplemental declaration in the cases of the above-captioned debtors (collectively, the “**Debtors**”) to supplement the disclosures set forth in my original declaration dated July 30, 2020 [ECF No. 222], my first supplemental declaration dated September 22, 2020 [ECF No. 450], my second supplemental declaration dated September 25, 2020 [ECF No. 472], my third supplemental declaration dated December 15, 2020 [ECF No. 727], and my fourth supplemental declaration dated April 5, 2021 [ECF No. 1047].

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

4. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- AP follows a practice to solicit from the members of its Boards their connections to the parties in interest independent of AP. In response, one or more of the members of its Boards have offered the following disclosures:
 - American Express is a vendor to an AP investor or one of its affiliates.
 - AT&T is a vendor to an AP investor or one of its affiliates.
 - Hogan Lovells is a current legal services provider to an AP investor or one of its affiliates.
 - J.P. Morgan is a vendor to an AP investor or one of its affiliates.
- AFIP, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors. AFIP is a vendor to AP.
- Aircastle Limited, operating lease service provider, and affiliates are lessors to a current AP client in matters unrelated to the Debtors.
- Airline Reporting Corporation, a contract party to the Debtors, is a former AP client in matters unrelated to the Debtors.
- American Alternative Insurance Corporation and American Alternative Insurance Corporation c/o Roanoke Insurance Group Inc., insurance and benefit providers to the Debtors, are bondholders to a former AP client in matters unrelated to the Debtors.
- Amex, a bank and financial provider to the Debtors, and affiliates are lienholders to a former AP client in matters unrelated to the Debtors.
- Apollo Management Holdings, L.P., a DIP party in this bankruptcy matter, and affiliates (“**Apollo**”) are affiliates, adverse litigation parties, bondholders, litigation parties, director-affiliated companies, lienholders, parent companies and shareholders to current and former AP clients in matters unrelated to the Debtors. Apollo is a current and former AP client in matters unrelated to the Debtors.
- Arthur J. Gallagher Risk Management Services, Inc., an insurance and benefit provider to the Debtors, is a related party and litigation party to current AP clients in matters unrelated to the Debtors.
- AXA Seguros SA DE CV, an insurance and benefit provider to the Debtors, and affiliates (“**AXA**”) are bondholders and shareholders to current and former AP clients

in matters unrelated to the Debtors. AXA is an insurance provider to AP. AXA is a vendor to AP.

- Bank of America N.A., a banking service provider to the Debtors, and affiliates are bondholders and lienholders to current and former AP clients in matters unrelated to the Debtors.
- Bank of Tokyo-Mitsubishi UFJ, a banking service provider to the Debtors, and affiliates are adverse litigation parties and bondholders to current AP clients in matters unrelated to the Debtors.
- BBVA, a creditor to the Debtors, is a bondholder to current AP clients in matters unrelated to the Debtors.
- Bexar County, a party in interest in this bankruptcy matter, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Blackrock Advisors (UK) LTD., Blackrock Fund Advisors, and Blackrock México Operadora SA DE CV SOFI, are equity holders to the Debtors, and affiliates are bondholders, adverse litigation parties, lessors, parent companies and lienholders to current and former AP clients in matters unrelated to the Debtors.
- BP International Limited, BP Oil España SA, BP Products North America Inc., BP West Coast Products LLC, Air BP Brasil Ltda and Air BP PBF Del Peru SAC, fuel suppliers to the Debtors, and affiliates are bondholders, lessors and litigation parties to current AP clients in matters unrelated to the Debtors.
- Carlyle Aviation Management Limited and Carlyle Aviation Partners, operating lease service providers and vendor to the Debtors, and affiliates are bondholders, lienholders and joint venture entities to current and former AP clients in matters unrelated to the Debtors.
- CenturyLink and CenturyLink Peru SA, utility providers to the Debtors, and affiliates are lessors to a former AP client in matters unrelated to the Debtors.
- Cerberus South American Investments, LLC, a noteholder to the Debtors, and affiliates are parent companies to a current AP client in matters unrelated to the Debtors.
- Cervantes Sainz, a professional in this bankruptcy matter, and affiliates are professionals to a current AP client in matters unrelated to the Debtors.
- CFE (Comisión Federal de Electricidad) (“CFE”), a contract counterparty to the Debtors, is a litigation party and parent company to a current AP client in matters unrelated to the Debtors. CFE is a current AP client in matters unrelated to the Debtors.

- Chevron Products Company and C.I. Chevron Export SAS, fuel suppliers to the Debtors, and affiliates are bondholders, joint venture entities and lessors to current AP clients in matters unrelated to the Debtors.
- Chubb Seguros México S.A. De C.V., an insurance provider to the Debtors and affiliates are litigation parties and bondholders to current and former AP clients in matters unrelated to the Debtors.
- Cisco Capital México, S. De R.L. De C.V., a contract party to the Debtors, and affiliates are bondholders to a former AP client in matters unrelated to the Debtors.
- Citibank, N.A., Citibanamex, Banco Nacional De Mexico SA, Integrante Del Grupo Financiero Banamex and Citigroup Global Markets Inc., banking service providers to the Debtors, and affiliates are bondholders and parent companies to current and former AP clients in matters unrelated to the Debtors.
- City and County of Denver, a taxing authority, government agency and airport authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- City of Austin, a taxing authority, government agency and airport authority to the Debtors, is a litigation party to a former AP client in matters unrelated to the Debtors.
- City of Killeen, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- City of Long Beach, a taxing authority, government agency and airport authority to the Debtors, is a bondholder, lessor and adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- City of Los Angeles, a taxing authority, government agency and airport authority to the Debtors, is a litigation party to a former AP client in matters unrelated to the Debtors. AP has an office in Los Angeles.
- City of Philadelphia, a taxing authority, government agency and airport authority to the Debtors, is a lessor to a current AP client in matters unrelated to the Debtors.
- City of San Antonio, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- City of San Jose, a taxing authority, government agency and airport authority to the Debtors, is a lessor and adverse litigation party to current AP clients in matters unrelated to the Debtors.

- City of Springfield, Missouri, a taxing authority, government agency and airport authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- Clifford Chance US LLP, a professional in this bankruptcy matter, are adverse litigation parties to a current AP client in matters unrelated to the Debtors.
- Commerzbank Aktiengesellschaft, a JOLCOS party to the Debtors, is a current and former AP client in matters unrelated to the Debtors.
- Comunicacion Celular SA Comcel SA, a utility provider to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- County of Humboldt, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Cox Communications Inc, a utility provider to the Debtors, and affiliates are litigation parties to a current AP client in matters unrelated to the Debtors.
- Credit Agricole and Investment Bank and Credit Agricole and Investment Bank, Tokyo Branch, creditors and JOLCOS parties to the Debtors, and affiliates are bondholders to a former AP client in matters unrelated to the Debtors.
- Creel, García-Cuellar, Aiza y Enriquez, S.C., a professional in this bankruptcy matter, are professionals to current AP clients in matters unrelated to the Debtors.
- CT Corporation Systems, a taxing authority, government agency, airport authority and vendor to the Debtors, and affiliates are lienholders to a current AP client in matters unrelated to the Debtors.
- D.H.L Servicios, S.A. DE C.V, a contract counterparty to the Debtors, is a vendor to AP.
- Deutsche Bank (London Branch), Deutsche Bank México S.A., Institución De Banca Múltiple División Fiduciaria, Deutsche Bank Mexico, S.A, Deutsche Bank México, S.A As Trustee Of Trust F/1748 (Bond Holders), Deutsche Bank México, S.A., Institución DE BANCA Múltiple, División FIDUCIARIA, as Trustee of Fideicomiso NO. F/1604, Deutsche Bank México, S.A., Institución De Banca Múltiple, División Fiduciaria, As Trustee Of Fideicomiso No. F/1698, Deutsche Bank México, S.A., Institución De Banca Múltiple, División Fiduciaria, As Trustee Of Fideicomiso No. F/1865, banking service providers and vendors to the Debtors, and affiliates (“**Deutsche Bank**”) are bondholders and lienholders to current and former AP clients in matters unrelated to the Debtors. Deutsche Bank was a member of the UCC

represented by AP in Chesapeake Energy Corporation, a former bankruptcy matter unrelated to the Debtors.

- Development Bank of Japan, a JOLCOS party to the Debtors, is a parent company to a current AP client in matters unrelated to the Debtor. Development Bank of Japan is a former AP client in matters unrelated to the Debtors.
- Dimensional Fund Advisors LP and Dimensional Fund Advisors Ltd., equity holders to the Debtors, and affiliates are bondholders to a current AP client in matters unrelated to the Debtors.
- Export-Import Bank of the United States, a banking service provider to the Debtors, and affiliates are associated companies and bondholders to former AP clients in matters unrelated to the Debtors.
- Exxon Mobil Aviation Division of EMPC BV, fuel suppliers to the Debtors, and affiliates are bondholders, joint venture entities and lessors to current and former AP clients in matters unrelated to the Debtors.
- Florida Department of Revenue, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.
- FTI Consulting, a restructuring professional in this bankruptcy matter, is a current AP client in matters unrelated to the Debtors.
- GE Capital Aviation Services, GE Engine Leasing Holdings Inc., GE Engine Services Distribution LLC, GE Engine Services LLC and General Electric, operating lease service providers, vendors and creditors to the Debtors, and affiliates are bondholders and lienholders to former AP clients in matters unrelated to the Debtors.
- Google Operaciones De Mexico S De RL De CV, a vendor to the Debtors, and affiliates are current AP clients in matters unrelated to the Debtors.
- Grupo Financiero HSBC, HSBC Bank USA, N.A., HSBC Mexico S.A., HSBC Securities (USA) Inc. and HSBC Bank, contract parties, creditors and banking service providers to the Debtors, and affiliates are bondholders, lienholders and shareholders to current and former AP clients in matters unrelated to the Debtors.
- Guerra González y Asociados, S.C., a professional in this bankruptcy matter, provides legal services to AP.
- Harris County, a party in interest in this bankruptcy matter, is an adverse litigation party to current AP client in matters unrelated to the Debtors.

- Herbalife Internacional de México, S.A. DE C.V., a contract counterparty to the Debtors, and affiliates are current AP clients in matters unrelated to the Debtors.
- Hewlett Packard, a contract party to the Debtors, and affiliates are lienholders and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.
- HM Revenue and Customs UK Tax, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.
- Hogan Lovells, a professional in this bankruptcy matter, is a current legal services provider to AP.
- Honeywell Aerospace Inc. and Honeywell International Inc., contract parties and vendors to the Debtors, and affiliates are professionals and litigation parties to current and former AP clients AP clients in matters unrelated to the Debtors.
- IBM, a creditor to the Debtors, and affiliates are bondholders and lienholders to current and former AP clients in matters unrelated to the Debtors.
- Industrial and Commercial Bank of China, a banking service provider to the Debtors, and affiliates are bondholders to a current AP client in matters unrelated to the Debtors.
- Investec Bank PLC, a banking service provider to the Debtors, and affiliates (“Investec”) are litigation parties and shareholders to current and former AP clients in matters unrelated to the Debtors. Investec is a current AP client in matters unrelated to the Debtors. Investec is a vendor to AP.
- Itau and Itau Seguros SA, banking service providers and insurance providers to the Debtors, and affiliates are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- J. Aron & Company, a banking service provider to the Debtors, is a litigation party and joint venture entity to current AP clients in matters unrelated to the Debtors.
- Johnson & Johnson Medical México, S.A. De C.V., a contract party to the Debtors, and affiliates are adverse litigation parties to a current AP client in matters unrelated to the Debtors.
- JP Morgan Chase Bank NA and J.P. Morgan Securities LLC, banking service providers to the Debtors, and affiliates are bondholders, investment banks, lienholders, limited partners and parent companies to current and former AP clients in matters unrelated to the Debtors.

- KfW IPEX-Bank GMBH, a party in interest in the bankruptcy matter, are former AP clients in matters unrelated to the Debtors.
- Kodak De México, S.A. De C.V., a contract party to the Debtors, and affiliates are lienholders and litigation parties to current AP clients in matters unrelated to the Debtors.
- LG U Plus, a utility provider to the Debtors, and affiliates (“**LG**”) are adverse litigation parties and affiliates to current and former AP clients in matters unrelated to the Debtors. LG is a former AP client in matters unrelated to the Debtors.
- Liebherr and Liebherr Aerospace Saline Inc, contract counterparties and vendors to the Debtors, are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Lufthansa Technik AG, a contract counterparty to the Debtors, and affiliates (“**Lufthansa**”) are affiliates and adverse litigation parties to former AP clients in matters unrelated to the Debtors. Lufthansa is a former AP client in matters unrelated to the Debtors.
- Macquarie, Macquarie Aerospace Finance 36707 Trust and Macquarie Investment Management, operating lease service providers and noteholders to the Debtors, and affiliates (“**Macquarie**”) are bondholders, related parties and parent companies to current and former AP clients in matters unrelated to the Debtors. Macquarie is a former employer of a current AP employee.
- Maples Fiduciary Services (Ireland) Limited and Maplesfs Trustees Ireland Limited, vendors to the Debtors, and affiliates (“**Maples**”) are counsel, opposing counsel and professionals to current and former AP clients in matters unrelated to the Debtors. Maples are current AP client in matters unrelated to the Debtors.
- Massachusetts Mutual Life Insurance Company, an insurance provider to the Debtors, and affiliates are bondholders to a former AP client in matters unrelated to the Debtors.
- Merrill Lynch Commodities Inc., a banking service provider to the Debtors, and affiliates, are bondholders, adverse litigation parties, lessors and lienholders to current and former AP clients in matters unrelated to the Debtors.
- MetLife, an insurance provider to the Debtors and affiliates are bondholders, adverse litigation parties, lienholders and lessors to current and former AP clients in matters unrelated to the Debtors.

- Microsoft, a contract counterparty party to the Debtors, and affiliates are related parties, litigation parties and bondholders to current AP clients in matters unrelated to the Debtors.
- MIZUHO LEASING CO LTD, an additional aircraft/engine party and affiliates (“**Mizuho**”) are bondholders, litigation parties and shareholders to current and former AP clients in matters unrelated to the Debtors. Mizuho is a former employer of a current AP employee.
- Moodys Investors Service Inc, a vendor to the Debtors, and affiliates (“**Moody’s**”) is a litigation party to a former AP client in matters unrelated to the Debtors. Moody’s is a former AP client in matters unrelated to the Debtors.
- Morgan Stanley Capital Group Inc., a banking service provider to the Debtors and affiliates (“**Morgan Stanley**”) are bondholders and lessors to current and former AP clients in matters unrelated to the Debtors. Morgan Stanley was a member of the UCC represented by AP in 24 Hour Fitness Worldwide, Inc., a former bankruptcy matter unrelated to the Debtors.
- Morgan, Lewis & Bockius, LLP, a professional in this bankruptcy matter, is a director-affiliated company to a former AP client in matters unrelated to the Debtors.
- Morris James LLP, a professional in this bankruptcy matter, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Morris, Nichols, Arsht & Tunnell LLP, (“**Morris Nichols**”), a professional to the Debtors, is opposing counsel to current AP clients in matters unrelated to the Debtors. Morris Nichols is a former legal services provider to AP.
- Morrison & Foerster LLP, a restructuring professional in this bankruptcy matter, (“**Morrison & Foerster**”) are litigation parties to a former AP client in matters unrelated to the Debtors. Morrison & Foerster was a member of the UCC represented by AP in The NORDAM Group, Inc., a former bankruptcy matter unrelated to the Debtors.
- MUFG Bank, Ltd. (As Successor to DVB Bank SE), a taxing authority, government agency and airport authority to the Debtors, and affiliates (“**MUFG**”) are adverse litigation parties to a current AP client in matters unrelated to the Debtors. MUFG was a member of the UCC represented by AP in Chesapeake Energy Corporation, a former bankruptcy matter unrelated to the Debtors. MUFG, has an account receivable factoring arrangement with AP and one of AP’s clients whereby AP’s invoices to that client are sold to MUFG Union Bank, N.A., in a way that improves payment terms to AP in exchange for an invoice discount.

- Natixis S.A. and Natixis, New York Branch, vendors and JOLCOS parties to the Debtors, and affiliates are bondholders and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.
- NCR De México, S. DE R.L. DE C.V., a contract party to the Debtors, and affiliates are lessors to a current AP client in matters unrelated to the Debtors.
- Nomura Babcock & Brown Co., Ltd., a JOLCOS party to the Debtors, and affiliates (“**Nomura**”) are bondholders, adverse litigation parties, litigation parties, investors, lessors, lienholders, parent companies, professionals and shareholders to current and former AP clients in matters unrelated to the Debtors. Nomura is a current and former AP client in matters unrelated to the Debtors. Nomura is a former employer of a current AP employee.
- Norges Bank Investment Management, an equity holder to the Debtors, and affiliates are adverse litigation parties to a current AP client in matters unrelated to the Debtors.
- NTT Data Services Mexico Operations S de RL de CV, a vendor to the Debtors, and affiliates (“**NTT Data**”) are adverse litigation parties to a current AP client in matters unrelated to the Debtors. NTT Data is a former AP client in matters unrelated to the Debtors.
- NTT Finance Corporation and NTT TC Leasing Co., LTD., and affiliates are vendors to AP.
- Orange S.A. (“**Orange**”), a utility provider to the Debtors, is a current AP client in matters unrelated to the Debtors. Orange is a vendor to AP.
- Outagamie County, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- PHL Variable Insurance Company and Phoenix Life Insurance Company, insurance providers to the Debtors, and affiliates are adverse litigation parties to a former AP client in matters unrelated to the Debtors.
- Puma Energy Aviation SA and Puma Energy Guatemala Sociedad Anonima, fuel suppliers to the Debtors, and affiliates are current AP clients in matters unrelated to the Debtors.
- Rothschild & Co., a professional to the Debtors, is a former employer of a current AP employee.
- Royal Bank of Canada, a banking service provider to the Debtors, and affiliates (“**RBC**”) are bondholders and lienholders to current and former AP clients in matters

unrelated to the Debtors. RBC are current and former AP clients in matters unrelated to the Debtors.

- Salesforce.com, Inc., a contract counterparty to the Debtors, is an investor to a current AP client in matters unrelated to the Debtors. Salesforce.com, Inc. is a vendor to AP.
- San Mateo County, a taxing authority, government agency and airport authority to the Debtors, is an adverse litigation party to current AP clients in matters unrelated to the Debtors.
- Scotiabank, a banking service provider to the Debtors, and affiliates (“**Scotiabank**”) are adverse litigation parties, bondholders and lienholders to current and former AP clients in matters unrelated to the Debtors.
- Shell Nederland Verkoopmaatschappij BV, a fuel supplier to the Debtors, and affiliates (“**Shell**”) are bondholders, joint venture entities, lessors and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Shell is a current and former AP client in matters unrelated to the Debtors.
- SoftBank Telecom, a vendor to the Debtors, and affiliates are litigation parties and shareholders to current AP clients in matters unrelated to the Debtors.
- Stone Harbor Investment Partners, a party in interest to the Debtors, are bondholders to a former AP client in matters unrelated to the Debtors.
- Swissport, a fuel supplier to the Debtors, and affiliates (“**Swissport**”) are shareholders to a current AP client in matters unrelated to the Debtors.
- Teléfonos de México, S.A.B. de C.V. (Telmex), Telmex Argentina SA and Telmex Colombia SA, contract counterparties and utility providers to the Debtors, and affiliates are bondholders to a former AP client in matters unrelated to the Debtors.
- Tesoreria de la Federacion, an unsecured creditor to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- The Bank Of New York Mellon, an unsecured creditor to the Debtors, and affiliates (“**BNY**”) are litigation parties, bondholders and lienholders to current and former AP clients in matters unrelated to the Debtors. BNY was a member of the UCC represented by AP in Chesapeake Energy Corporation, a former bankruptcy matter unrelated to the Debtors.
- The Boeing Company, an unsecured creditor to the Debtors, and affiliates are adverse litigation parties to a current AP client in matters unrelated to the Debtors.

- The Coca-Cola Export Corporation, Mexico Branch, a contract party to the Debtors, and affiliates are adverse litigation parties to a current AP client in matters unrelated to the Debtors.
- The Vanguard Group, Inc., an equity holder to the Debtors, and affiliates are bondholders to current and former AP clients in matters unrelated to the Debtors.
- UMB Bank, N.A. (“**UMB Bank**”), a DIP party to the Debtors, is an adverse litigation party, lienholder, professional and shareholder to current AP clients in matters unrelated to the Debtors. UMB Bank was a member of the UCC represented by AP in Windstream Holdings, Inc., a former bankruptcy matter unrelated to the Debtors.
- URSSAF, a taxing authority, government agency and airport authority to the Debtors, is a vendor to AP.
- Washington State Department of Labor & Industries, a taxing authority, government agency and airport authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.
- Wells Fargo, Wells Capital, and Wells Fargo Securities, LLC, bondholders and lenders to the Debtors, and affiliates (“**Wells Fargo**”) are bondholders, director-affiliated companies and lienholders to current and former AP clients in matters unrelated to the Debtors. Wells Fargo was a noteholder represented by AP in LBI Media, Inc., a bankruptcy matter unrelated to the Debtors. Wells Fargo was a member of the UCCs represented by AP in Extraction Oil & Gas, Inc. and 24 Hour Fitness Worldwide, Inc., former bankruptcy matters unrelated to the Debtors.
- White & Case, LLP, a professional in this bankruptcy matter, is a former legal services provider to AP.
- Wilmington Trust Company, vendors and operating lease service providers to the Debtors, and affiliates (“**Wilmington Trust**”) are bondholders and lienholders to current and former AP clients in matters unrelated to the Debtors. Wilmington Trust was a member of the UCC represented by AP in Murray Energy Holdings Co., a former bankruptcy matter unrelated to the Debtors.
- Winston & Strawn LLP, a professional in this bankruptcy matter, is a former employer of a current AP employee.
- World Pay, a banking service provider to the Debtors, and affiliates are former AP clients in matters unrelated to the Debtors.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners’ disclosures in the

event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: October 5, 2021
New York, New York

AlixPartners, LLP

/s/ Lisa Donahue

Lisa Donahue
Managing Director