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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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

CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS TO REDACT COMMERCIALLY SENSITIVE INFORMATION

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the "**Local Rules**"), and in accordance with the United States Bankruptcy Court's case management procedures set forth in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on July 8, 2020 [ECF No. 79] (the "**Case Management Order**"), the undersigned hereby certifies as follows:

1. On October 7, 2021, the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") filed the *Debtors' Motion for Entry of an Order Authorizing the*

[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.

Debtors To Redact Commercially Sensitive Information [ECF No. 1846] (the "**Motion**"). Objections and responsive pleadings to the Motion were due no later than October 18, 2021 at 12:00 p.m. (prevailing Eastern Time) (the "**Objection Deadline**").

2. The Case Management Order and Local Rule 9075-2 provide that pleadings may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable deadline and (b) the attorney for the entity that filed the pleading complies with the relevant procedural and notice requirements.

3. As of the filing of this certificate, more than 48 hours have elapsed since the Objection Deadline and, to the best of my knowledge, no objection or responsive pleading to the Motion has been (a) filed with the Court on the docket of the above-captioned chapter 11 cases or (b) served on the Debtors or their counsel.

4. Accordingly, the Debtors respectfully request that the Court enter the proposed order, a copy of which is attached hereto as **Exhibit A**, granting the Motion in accordance with the procedures set forth in the Case Management Order and Local Rule 9075-2.

[Remainder of page intentionally left blank]

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 20, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: */s/ Timothy Graulich*

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Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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

ORDER AUTHORIZING THE DEBTORS TO REDACT COMMERCIALLY SENSITIVE INFORMATION

Upon the motion (the "**Sealing Motion**")[2] of the Debtors for entry of an order (this "**Order**"), authorizing the Debtors to redact the Confidential Information contained in the Exhibits, as set forth more fully in the Sealing Motion and the Landess Declaration; and the Court having jurisdiction to consider the Sealing Motion and the relief requested therein 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.); and consideration of the Sealing Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue of the Chapter 11 Cases and related proceedings being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Sealing Motion having been provided to the notice parties identified in the Sealing Motion; such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having reviewed the Sealing Motion and considered

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[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Sealing Motion.

the relief requested therein; and upon all of the proceedings had before the Court; and after due deliberation the Court having determined that the legal and factual bases set forth in the Sealing Motion establish just cause for the relief granted herein; and the Court having found that the relief granted herein is in the best interests of the Debtors, their creditors, and all other parties in interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Sealing Motion is granted as set forth herein.

2. The Debtors are authorized to (a) file the Exhibits on the public docket of the Chapter 11 Cases with the Confidential Information redacted and (b) submit unredacted versions thereof to the Clerk of the Court, along with a copy of this Order, clearly labeled "TO BE FILED UNDER SEAL."

3. The Confidential Information shall remain confidential and shall not be made available to anyone (other than the U.S. Trustee and the respective advisors to the Committee, the DIP Lenders, the Ad Hoc Group of Senior Noteholders, and the Ad Hoc Group of Unsecured Claimholders on a "Professionals Eyes Only" basis) without the prior written consent of the Debtors.

4. The Debtors and any party authorized to receive unredacted copies of the Exhibits pursuant to this Order shall be authorized and directed, subject to Rule 9018-1(c) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, to redact specific references to the Confidential Information included therein from any pleadings filed on the public docket of the Chapter 11 Cases.

5. Entry of this Order is without prejudice to the rights of any party in interest in the Chapter 11 Cases or the U.S. Trustee to seek an order of this Court unsealing all or part of the Confidential Information.

6. The Clerk of the Court is authorized to destroy the unredacted Exhibits at the conclusion of the Chapter 11 Cases.

7. The Debtors are authorized to take, or refrain from taking, any action necessary or appropriate to implement and effectuate the terms of, and the relief granted in, this Order without seeking further order of the Court.

8. While the above referenced Chapter 11 Cases are pending, this Court shall retain the exclusive jurisdiction over any and all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2021
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE