

MILBANK LLP

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Invictus Global Management, LLC, Oaktree
Capital Management, L.P., and Silver Point
Capital, L.P.*

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

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

**VERIFIED STATEMENT
PURSUANT TO BANKRUPTCY RULE 2019**

Milbank LLP (“Milbank”) hereby makes the following verified statement (this “Verified Statement”), pursuant to rule 2019 of the Federal Rules of Bankruptcy Procedure (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.

“Bankruptcy Rules”), in connection with Milbank’s representation in these chapter 11 cases of The Baupost Group, L.L.C. (“Baupost”), Invictus Global Management, LLC (“Invictus”), Oaktree Capital Management, L.P. (“Oaktree”), and Silver Point Capital, L.P. (“Silver Point” and, together with Baupost, Invictus, and Oaktree, the “BSPO Investors”):

1. The BSPO Investors have retained Milbank as counsel in connection with the chapter 11 cases of Grupo Aeroméxico, S.A.B. de C.V. and its affiliated debtors and debtors in possession (the “Debtors”).

2. As of the date of this Verified Statement, Milbank represents the BSPO Investors and does not represent or purport to represent any entities other than the BSPO Investors in connection with the Debtors’ chapter 11 cases. In addition, neither Baupost, Invictus, Oaktree, nor Silver Point represent or purport to represent any other entities in connection with the Debtors’ chapter 11 cases.

3. Certain of the BSPO Investors have indicated to Milbank that they beneficially own disclosable economic interests, or act as investment managers or advisors to funds or accounts that beneficially own disclosable economic interests, in relation to the Debtors. In accordance with Bankruptcy Rule 2019 and based upon information provided to Milbank by each of the BSPO Investors, attached hereto as **Exhibit A** is a list of the names, addresses, nature and amount of all disclosable economic interests of each of the BSPO Investors in relation to the Debtors.

4. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver of, any rights of Baupost, Invictus, Oaktree or Silver Point to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these cases.

5. The information contained herein is provided only for the purpose of complying with Bankruptcy Rule 2019 and is not intended for any other use or purpose.

6. Milbank reserves the right to amend this Verified Statement as may be necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

7. The undersigned hereby verifies that this Verified Statement is true and accurate to the best of the undersigned's knowledge and belief.

New York, New York
Dated: October 27, 2021

/s/ Dennis F. Dunne

MILBANK LLP

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Management, L.P., and Silver Point Capital, L.P.*

Exhibit A¹

<u>NAME</u> ²	<u>ADDRESS</u>	<u>AGGREGATE PRINCIPAL AMOUNT OF UNSECURED CLAIMS</u>
The Baupost Group, L.L.C.	10 Saint James Avenue, Suite 1700 Boston, MA 02116	\$0.00
Invictus Global Management, LLC	310 Comal Street Building A, Suite 229 Austin, TX 78702	\$48,537,744.21
Oaktree Capital Management, L.P.	333 South Grand Ave., 28th Floor Los Angeles, CA 90071	\$0.00
Silver Point Capital, L.P.	2 Greenwich Plaza, Greenwich, CT 06830	\$58,500,000.00

¹ To the best of Milbank's knowledge, the information herein is accurate as of October 27, 2021. The amounts set forth herein include only the outstanding principal amounts of the applicable debt and do not include accrued and unpaid interest, fees, or other amounts that may be owing under the applicable debt documents.

² Each entity on this Exhibit A is listed either in its principal capacity or in its capacity as agent, investment advisor, or investment manager for certain investment funds or accounts or their respective subsidiaries that hold disclosable economic interests in relation to the Debtors.