

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)

AFFIDAVIT AND DISCLOSURE STATEMENT OF PAULO MONTT,
ON BEHALF OF GANDARILLAS, MONTT, DEL RÍO DOS LTDA.

STATE OF CHILE)

) s.s.:

COUNTY OF LAS CONDES, SANTIAGO)

Paulo Montt, being duly sworn, upon his oath, deposes and says as follows:

1. I am a partner of Gandarillas, Montt, del Río Dos Ltda., located at Av. Apoquindo 3472, 10th Floor (the “**Firm**”).
2. Grupo Aeroméxico, S.A.B. de C.V. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), have requested that the Firm provide legal services to the Debtors, and the Firm has consented to provide such services (the “**Services**”).
3. The Services include, but are not limited to, the following: legal assistance in connection with an antitrust investigation handled by the Chilean Antitrust Agency, *Fiscalía Nacional Económica* (FNE) with regards an agreement between Latam Airlines Group and Delta

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.

★ Airlines, Inc. (case No. 2585-19 FNE) and other related and miscellaneous matters as may be requested by Debtors.

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

7. As of the commencement of this chapter 11 case, the Debtors owed the Firm \$0 in respect of prepetition services rendered to the Debtors.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.



[Remainder of Page Intentionally Left Blank]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on October, 29th, 2021, at Santiago, Chile.

PAULO MONTT

Affiant Name

SWORN TO AND SUBSCRIBED before
Me this 29th day of October, 2021

Notary Public

Autorizo la firma de don **PAULO ANTONIO MONTT RETTIG**, C.I.:
13.232.077-2, quien acreditó su identidad con su cédula
respectiva.- Santiago, 29 de octubre de 2021.- Mls.



María José Bravo Cruz
Notario Reemplazante
34° NOTARIA DE SANTIAGO
EDUARDO DIEZ MORELLO



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)

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Grupo Aeroméxico, S.A.B. de C.V. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”).

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

Gandarillas, Montt, del Río Dos Ltda.

Apoquindo 3472, 10th Floor, Santiago, Chile

2. Date of retention: December 18, 2020.

3. Type of services to be provided:

Legal services

4. Brief description of services to be provided:

The Services include, but are not limited to, the following: a) Interviews, conferences and phone calls with Debtors and its attorneys; b) Review of documents, responses or communications to be

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sent or produced with the FNE; c) Review of other documents as indicated by Debtors or its attorneys; d) Coordination and contact with FNE officers; e) Other required tasks as per your advice and agreement with Debtors.

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly.

(a) Average hourly rate (if applicable):

Paulo Montt - USD \$300 per hour.

(b) Estimated average monthly compensation based on prepetition retention (if company was employed prepetition):

Not known at this time, *roughly USD 500 per month.*

6. Prepetition claims against the Debtors held by the company:

Amount of claim: N/A

Date claim arose: N/A

Nature of claim: N/A

7. Prepetition claims against the Debtors held individually by any member, associate, or employee of the company:

Name: N/A

Status: N/A

Amount of claim: N/A

Date claim arose: N/A

Nature of claim: N/A



8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

N/A

9. Name and title of individual completing this form:

Paulo Montt, Partner

Dated: October 29, 2021

A handwritten signature in blue ink, appearing to read "Paulo Montt", with a horizontal line underneath.

Autorizo la firma de don **PAULO ANTONIO MONTT RETTIG**, C.I.:
13.232.077-2, quien acreditó su identidad con su cédula
respectiva.- Santiago, 29 de octubre de 2021.- Mls.

A handwritten signature in blue ink, appearing to read "Marfa José Bravo Cruz".

Marfa José Bravo Cruz
Notario Reemplazante
34° NOTARIA DE SANTIAGO
EDUARDO DIEZ MORELLO