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Attorneys for Claimant

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: GRUPO AEROMÉXICO, S.A.B. de
C.V., et al., Debtors

Chapter 11 Case No. 20-11563 (SCC)
(Jointly Administered)

RESPONSE BY JOSE LUIS FUENTES TO
DEBTORS' TWENTY-SECOND
OMNIBUS CLAIMS OBJECTION TO
PROOFS OF CLAIM (SATISFIED
CLAIMS)

**Honorable Judge Shelley C.
Chapman**

1 TO THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, THE
2 UNITED STATES TRUSTEE, THE DEBTOR, THE DEBTOR'S COUNSEL OF RECORD,
3 AND ALL OTHER PARTIES IN INTEREST:

4 PLEASE TAKE NOTICE that JOSE LUIS FUENTES ("Applicant") hereby gives
5 notice of his RESPONSE and objection to having his Claim # 0000013035 filed on
6 01/12/2021 13:25:54 in this bankruptcy case against DEBTORS.

7 The basis of this Response and objection is because Applicant's Claim has not
8 been satisfied as (i) the Ticket has not been used for airfare on Aeroméxico or another
9 airline; (ii) the Ticket has not been refunded; or (iii) a Voucher was not issued in
10 exchange for the Ticket). Applicant made calls and no responses from Aeromexico
11 related to a refund or voucher or the status of his cancelled flight. Recently, Applicant
12 called the Aeromexico Epiq Corporate Restructuring LLC to see about a Voucher and
13 they said they would let Aeromexico know and get back to Applicant. However, their
14 has been no outreach by Aeromexico as of the filing of this Response.

15 As to the timeliness of the Response, Applicant ask to be excuse by the tardiness
16 of the response by a few hours because Applicant has been suffering from Covid-19
17 diagnosis positive test and fevers. Applicant was in isolation and had to drive to his
18 office to obtain the documents needed to file this Response. Applicant had to travel over
19 3 hours to arrive at the office to file this Response. Due to Covid-19 symptoms
20 Applicant could not file this Response sooner.

21 Applicant further requests that all future notices and other papers and
22 communications be sent to Applicant as follows:

23 JOSE LUIS FUENTES, SBN 192236
24 2198 Cleveland Ave,
25 Salton City, CA 92274
Fuentes@jlfllaw.net

26 Neither this Response, Request for Special Notice and to be Included in Creditor
27 Matrix, Reservation of Rights, and Objection to Jurisdiction, nor any subsequent
28 appearance, pleading, claim, proof of claim, document, suit, motion nor
any other writing or conduct, shall constitute a waiver of Clients':

1 (1) Right to have any and all final orders in any and all non-core matters entered
2 only after de novo review by a United States District Court Judge;

3 (2) Right to trial by jury in any proceeding as to any and all matters so triable
4 herein, whether or not the same be designated legal or private rights, or in any case,
5 controversy or proceeding related hereto, notwithstanding the designation vel non of
6 such matters as "core proceedings" pursuant to 28 USC §157(b) (2) (H), and whether
7 such jury trial right is pursuant to statute or the United States Constitution;

8 (3) Right to have the reference withdrawn by the United States District Court in
9 any matter or proceeding subject to mandatory or discretionary withdrawal;

10 (4) Right to receipt of service of process in all actions, causes, claims or
11 proceedings arising in, arising under or related to these proceedings to be served
12 directly on Clients as required by law;

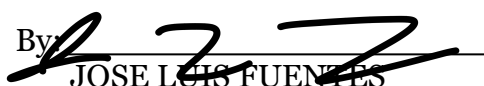
13 (5) Right to contest service of process; or

14 (6) Other rights, claims, actions, defenses, setoffs, recoupments or other matters
15 to which any party is entitled under any agreements or at law or in equity or under the
16 United States Constitution.

17 All of the above rights are expressly reserved and preserved without exception
18 and with no purpose of confessing or conceding jurisdiction in any way by this filing or
19 by any other participation in these matters.

20
21 Dated: November 4, 2021

Law Office of José Luis Fuentes

22
23 By 
24 JOSE LUIS FUENTES
25 Pro-Se

26 CERTIFICATE OF SERVICE BY MAIL

27 I, Jose Luis Fuentes, declares as follows:
28

1 I am employed in the County of Imperial, State of California. I am over the age of
2 18 and am not a party to the above-named action. My business address is 2198
3 Cleveland Ave, Salton City, CA 92274, in said County and State. On the Friday,
4 November 04, 2021, I served the attached:

5 **RESPONSE TO DEBTORS' TWENTY-SECOND OMNIBUS CLAIMS**

6 **OBJECTION TO PROOFS OF CLAIM (SATISFIED CLAIMS)**

7 by sending via email a true copy of the **RESPONSE TO DEBTORS' TWENTY-**
8 **SECOND OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM**

9 **(SATISFIED CLAIMS)** in an Email addressed to each person named below from
10 fuentes@jlflaw.net at the email address shown:

11 Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017 (Attn:
12 Timothy Graulich (timothy.graulich@davispolk.com), Stephen D. Piraino
13 (stephen.piraino@davispolk.com), Erik P. Jerrard (erik.jerrard@davispolk.com), and
14 Richard J. Steinberg (richard.steinberg@davispolk.com)), counsel to the Debtors; and
15 Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn:
16 Brett H. Miller (bmiller@willkie.com), Todd M. Goren (tgoren@willkie.com), Craig
17 Damast (cdamast@willkie.com), and Debra M. Sinclair (dsinclair@willkie.com)),
18 counsel to the Official Committee of Unsecured Creditors.

19 I declare under penalty of perjury under the laws of the State of California and
20 the United States of America that I am employed in the office of a member of the bar of
21 this Court at whose direction the service was made, that the foregoing is true and
22 correct, and that this declaration was executed on this day of November 4, 2021, at Los
23 Angeles, California.

24 By: 
25 JOSE LUIS FUENTES
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27
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