

Hearing Date: November 16, 2021 @ 11:00 a.m. (ET)
Objection Deadline: November 15, 2021 @ 4:00 p.m. (ET)

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

In re:

GRUPO AEROMÉXICO, S.A.B. de C.V., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION TO THE FOURTH INTERIM FEE
APPLICATION OF ALIXPARTNERS, LLP AND ALIXPARTNERS
INTERNATIONAL, INC., FINANCIAL ADVISOR TO THE
CHAPTER 11 DEBTORS, FOR ALLOWANCE OF COMPENSATION FOR
PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD MAY 1, 2021 THROUGH SEPTEMBER 30, 2021**

I, Lisa Donahue, make this Declaration pursuant to 28 U.S.C. § 1746, and state:

1. I am a Managing Director in the firm of AlixPartners, LLP and AlixPartners International, Inc. (“AlixPartners”), with offices at 909 Third Avenue, 28th Floor, New York, New York 10022. AlixPartners serves as financial advisor to Grupo Aeromexico, S.A.b. de C.V. and its affiliated debtors (the “Debtors”) in these Chapter 11 Cases².

2. On October 26, 2021, AlixPartners filed its *Fourth Interim Fee Application of AlixPartners, LLP and AlixPartners International, Inc., Financial Advisor to the Chapter 11*

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.

² All capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

Debtors, for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses for the Period May 1, 2021 through September 30, 2021 (the “Application”) [Docket No. 1976].

3. In further support of the Application, the following is a schedule of all interim fee applications filed, Court Orders entered, and payments received and due during the interim periods in the Chapter 11 Cases.

Date Filed; Docket No.	Period Covered	Requested		Date Filed; Docket No.	Awarded		Paid		Amount Outstanding
		Fees	Expenses		Fees	Expenses	Fees	Expenses	
10/15/2020 Docket #542	07/01/2020- 08/31/2020	\$ 7,603,042.50	\$ 220.00	11/30/2021 Docket #673	\$ 7,577,892.45	\$ 220.00	\$ 6,830,163.23	\$ 220.00	\$ 772,879.27
1/28/2021 Docket #858	9/1/2020 - 12/31/2021	\$ 9,401,376.00	\$ -	1/28/2021 Docket #858	\$ 6,714,491.50	\$ -	\$ 8,398,826.65	\$ -	\$ 1,002,549.35
06/23/2021 Docket #1339 ¹	1/1/2021 - 4/30/2021	\$13,748,314.00	\$ -	Not Entered Hearing Date: 11/16/2021		\$ -	\$ 11,002,446.40	\$ -	\$ 2,745,867.60
10/26/2021 Docket #1976 ²	5/1/2021 - 9/30/2021	\$15,027,628.75	\$ 6,420.92	Not Entered Hearing Date: 11/16/2021		\$ -	\$ 9,732,641.35	\$ 4,491.31	\$ 5,296,917.01
Subtotal		\$45,780,361.25	\$ 6,640.92		\$ 14,292,383.95	\$ 220.00	\$ 35,964,077.63	\$ 4,711.31	\$ 9,818,213.23
Less Voluntary Reduction ³		\$ (25,150.05)							\$ (25,150.05)
Less Voluntary Reduction ⁴		\$ (124,823.50)							\$ (124,823.50)
Total		\$45,630,387.70	\$ 6,640.92		\$ 14,292,383.95	\$ 220.00	\$ 35,964,077.63	\$ 4,711.31	\$ 9,668,239.68

¹ This amount includes AlixPartners' voluntarily reduction for professional fees in the amount of \$4,744.00 for Lisa Marie Bonito, Brooke Filler and Elizabeth S. Kardos, timekeepers with less than five hours during the Third Interim Period.

² This amount includes AlixPartners' voluntarily reduction for professional fees in the amount of \$7,870.50 for the following timekeepers with fewer than five (5) hours billed during the Fourth Interim Period: Tony Ratcliffe, Elizabeth S. Kardos, James D. Goss, and Bogdan Avramescu. In addition, and following discussions with the U.S. Trustee, AlixPartners agreed to write-off an additional amount of \$35,000.00, for a total voluntary reduction of \$42,870.50 during the Fourth Interim Period.

³ AlixPartners voluntarily agreed with the U.S. Trustee to a reduction of professional fees in the amount of \$25,150.05 during the First Interim Period.

⁴ AlixPartners voluntarily agreed with the U.S. Trustee to a reduction of professional fees in the amount of \$124,823.50 during the Second Interim Period.

I declare under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information and belief.

Dated: November 9, 2021

ALIXPARTNERS, LLP AND
ALIXPARTNERS INTERNATIONAL, INC.

/s/ Lisa Donahue

By: Lisa Donahue
Managing Director