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**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)

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING DEBTORS' TWENTY-THIRD OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (WRONG DEBTOR, INCORRECTLY
CLASSIFIED, AND/OR FOREIGN CURRENCY CLAIMS)**

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 this 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**”) and the *Court-Ordered Omnibus Claims Hearing Procedures*, entered on February 17,

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.

2021 [ECF No. 904] (the “**Omnibus Claims Hearing Procedures**”), the undersigned hereby certifies as follows:

1. Responses to the *Debtors’ Twenty-Third Omnibus Claims Objection to Proofs of Claim (Wrong Debtor, Incorrectly Classified, and/or Foreign Currency Claims)* [ECF No. 1817] (the “**Objection**”), filed on October 4, 2021, by Grupo Aeroméxico, S.A.B. de C.V. and its affiliates that are debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), were due no later than November 4, 2021 at 4:00 p.m. (prevailing Eastern Time) (the “**Response Deadline**”).

2. The Case Management Order, the Omnibus Claims Hearing Procedures 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 forty-eight (48) hours have elapsed since the Response Deadline and, to the best of my knowledge, no objection or responsive pleading to the Objection has been (a) filed with the Court on the docket of the Chapter 11 Cases or (b) served in accordance with the Omnibus Claims Hearing Procedures.

4. Accordingly, the Debtors respectfully request that the Court enter the proposed order, a copy of which is attached hereto as **Exhibit A**, sustaining the Objection in accordance with the procedures described in the Case Management Order and the Omnibus Claims Hearing Procedures.

[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: November 15, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich
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and Debtors in Possession*

Exhibit A to Certificate of No Objection

Order

**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)

**ORDER GRANTING DEBTORS' TWENTY-THIRD OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (WRONG DEBTOR, INCORRECTLY
CLASSIFIED, AND/OR FOREIGN CURRENCY CLAIMS)**

Upon the objection (the “**Objection**”)² of the above-captioned Debtors, pursuant to sections 105 and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, seeking to modify and/or reclassify the Claims identified on **Schedules 1, 2, 3, and 4** attached hereto, as described therein; and upon the Sánchez Declaration, attached to the Objection as **Exhibit 2**; and the Court having jurisdiction to consider the matters raised in the Objection pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and the Court having authority to hear the matters raised in the Objection pursuant to 28 U.S.C. § 157; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and consideration of the Objection and the relief requested therein being a core proceeding that the Court can determine pursuant to 28 U.S.C. § 157(b)(2); and due and proper notice of the Objection and opportunity for a hearing on the Objection having been given to the parties listed therein, and it appearing that no other or further notice need be provided; and the Court having

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² Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

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

IT IS HEREBY ORDERED THAT:

1. The Objection is hereby granted as set forth herein.
2. The Wrong Debtor Claims identified on **Schedule 1** annexed hereto are hereby modified as described therein such that each Wrong Debtor Claim is hereby reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the column labeled “Correct Debtor” applicable thereto on **Schedule 1**.
3. The Wrong Debtor and Incorrectly Classified Claims identified on **Schedule 2** annexed hereto are hereby modified as described therein such that each Claim is hereby (i) reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the row labeled “Modified Claim” applicable thereto on **Schedule 2** and (ii) reclassified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 2**, and, to the extent reclassified by this Order, such Claims shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11 Cases.
4. The Wrong Debtor and Foreign Currency Claims identified on **Schedule 3** annexed hereto are hereby modified as described therein such that each Claim is hereby (i) reassigned from the Debtor against which such Claim was originally filed to the Debtor identified in the row labeled “Modified Claim” applicable thereto on **Schedule 3** and (ii)

modified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 3**.

5. The Incorrectly Classified Claim identified on **Schedule 4** annexed hereto is hereby reclassified as described in the corresponding row labeled “Modified Claim” applicable thereto on **Schedule 4** and, to the extent reclassified by this Order, shall not be considered secured, administrative, and/or priority Claims, as applicable, for any purpose in the Chapter 11 Cases.

6. This Order shall be deemed a separate Order with respect to each of the Claims identified on the Schedules annexed hereto. Any stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

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

8. Notwithstanding any Bankruptcy Rule, the Local Bankruptcy Rules for the Southern District of New York, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. This Court shall retain jurisdiction to hear and determine all matters arising from, arising under, or related to the Chapter 11 Cases, to the fullest extent permitted by law, including, without limitation, to enforce this Order.

Dated: _____, 2021
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Wrong Debtor Claims

Wrong Debtor Claims

Ref	Claim #	Transferred	Wrong Debtor	Correct Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	14858	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	FLIGHT CENTRE TRAVEL GROUP LIMITED 275 GREY ST SOUTH BRISBANE QLD 4101 AUSTRALIA	0.00	0.00	0.00	0.00	0.00 USD	Yes
Date Filed:		12/22/2020									
2	20482	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	FRANCO, LINDA AVENDAÑO 178 VELOCITY WAY SAN JOSE, CA 95110	0.00	0.00	550.07	0.00	550.07 USD	Yes
Date Filed:		1/15/2021									
3	10341	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	FRANCO, MARIA DE LOS ANGELES BUENO GUAMUCHIL 617 RINCONADA 1 TIJUANA, BC 22457 MÉXICO	0.00	0.00	0.00	889.00	889.00 USD	No
Date Filed:		12/9/2020									
4	14917	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	MACNEIL, DAVID 240 CAMERON ST N KITCHENER ON N2H 3B4 CANADA	0.00	0.00	0.00	1,782.68	1,782.68 USD	No
Date Filed:		8/22/2021									
5	10404	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	MENDEZ, VICTOR 3207 JUSTIN LANCASTER, CA 93535	0.00	0.00	0.00	1,600.00	1,600.00 USD	No
Date Filed:		12/11/2020									
6	14925	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	SLYVA, BETHANY 15 FARRELL ST, APT 2 QUINCY, MA 02169	0.00	0.00	0.00	1,300.00	1,300.00 USD	No
Date Filed:											
7	14916	No	Grupo Aeroméxico, S.A.B. de C.V.	Aerovías de México, S.A. de C.V.	STONE, KATREECE 6460 THORNHILL DR OAKLAND CA 94611	0.00	0.00	0.00	2,471.60	2,471.60 USD	No
Date Filed:											
Wrong Debtor Claim Totals:				Count:	USD	7	0.00	0.00	550.07	8,043.28	8,593.35

Schedule 2

Wrong Debtor and Incorrectly Classified Claims

Wrong Debtor & Incorrectly Classified Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	217	No	Grupo Aeroméxico, S.A.B. de C.V.	AMIGO TRAVEL 19 PARK HILL AVE YONKERS, NY 10701	0.00	0.00	42,000.00	0.00	42,000.00 USD	No	Insufficient documentation to support priority claim
Date Filed:	1/4/2021										
Modified Claim:	217	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	42,000.00	42,000.00 USD	No	
2	11123	No	Grupo Aeroméxico, S.A.B. de C.V.	ARKAS TURIZM SEYAHAT ACENTASIAS ARKAS MIST KONAKRAL OFIS KULE IZMIR 35170 TURKEY	0.00	847.00	0.00	0.00	847.00 USD	No	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
Date Filed:	12/30/2020										
Modified Claim:	11123	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	847.00	847.00 USD	No	
3	20553	No	Grupo Aeroméxico, S.A.B. de C.V.	FERRER, CARLA MARIN C/ ROGER DE FLOR, 193 - 195 PISO 4 PUERTA 4 BARCELONA 08013 SPAIN	1,332.38	0.00	0.00	0.00	1,139.52 USD	No	Insufficient documentation to support secured claim
Date Filed:	9/13/2021										
Modified Claim:	20553	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,139.52	1,139.52 USD	No	
4	14854	No	Grupo Aeroméxico, S.A.B. de C.V.	MISSIONARY VENTURES INTERNATIONAL 1017 MAITLAND CENTER COMMONS BLVD MAITLAND, FL 32751	0.00	1,960.96	0.00	0.00	1,960.96 USD	Yes	No goods delivered; not entitled to administrative claim (§ 503(b)(9))
Date Filed:	4/22/2021										
Modified Claim:	14854	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,960.96	1,960.96 USD	Yes	
5	20411	No	Grupo Aeroméxico, S.A.B. de C.V.	VIAJES FUENTES SL PLAZA DEL JUNCAL, 2 SEVILLA - ESPAÑA ES 41005 SPAIN	1,038.85	0.00	0.00	0.00	1,038.85 USD	Yes	Insufficient documentation to support secured claim
Date Filed:	1/15/2021										
Modified Claim:	20411	No	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	1,038.85	1,038.85 USD	Yes	
Wrong Debtor & Incorrectly Classified Claims Total:			Count:	USD	5	2,371.23	2,807.96	42,000.00	0.00	46,986.33	

Schedule 3

Wrong Debtor and Foreign Currency Claim

Wrong Debtor & Foreign Currency Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	14915	False	Grupo Aeroméxico, S.A.B. de C.V.	NAKAMURA, CHIHARU 138 CHARLTON BLVD NORTH YORK ON M2R 2J1 CANADA	0.00	0.00	0.00	785.00	785.00 CAD	No
Date Filed:	1/15/2021									
Modified Claim:	14915	False	Aerovías de México, S.A. de C.V.		0.00	0.00	0.00	570.06	570.06 USD	No

Wrong Debtor & Foreign Currency Claim Total:	Count:	CAD	1	0.00	0.00	0.00	785.00	785.00
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Schedule 4

Incorrectly Classified Claim

Incorrectly Classified Claim

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	12610	No	Aerovías de México, S.A. de C.V.	PARK, KWON CHUL NO 302, 48-11 JIJOK-RO 349 BEON-GIL YUSEONG-GU	2,000.00	0.00	2,000.00	0.00	2,000.00 USD	No	Insufficient documentation to support secured claim
Date Filed:	1/11/2021										
Modified Claim:	12610	No	Aerovías de México, S.A. de C.V.	DAEJEON 34071, REPUBLIC OF KOREA	0.00	0.00	2,000.00	0.00	2,000.00 USD	No	
Incorrectly Classified Claim Total:			Count:	USD	1	2,000.00	0.00	2,000.00	0.00	2,000.00	