

**THIS OBJECTION SEEKS TO DISALLOW, EXPUNGE, MODIFY, REDUCE, AND/OR RECLASSIFY CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' TWENTY-SIXTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR THE EXHIBITS AND SCHEDULES ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT GRUPO AEROMÉXICO'S COUNSEL, DAVIS POLK & WARDWELL LLP, AT [aeromexicoclaims@dpw.com](mailto:aeromexicoclaims@dpw.com), RICHARD J. STEINBERG ([richard.steinberg@davispolk.com](mailto:richard.steinberg@davispolk.com) or +1-646-460-1954), OR MOSHE MELCER ([moshe.melcer@davispolk.com](mailto:moshe.melcer@davispolk.com) or +1-732-606-3155).**

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

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**NOTICE OF HEARING ON DEBTORS' TWENTY-SIXTH OMNIBUS  
CLAIMS OBJECTION TO PROOFS OF CLAIM (INSUFFICIENT  
DOCUMENTATION, WRONG DEBTOR, INCORRECTLY CLASSIFIED, NO  
LIABILITY, SATISFIED, DUPLICATE, AND REDUCED CLAIMS)**

PLEASE TAKE NOTICE that, on November 17, 2021, Grupo Aeroméxico, S.A.B. de C.V. (“**Grupo Aeroméxico**”) and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed their *Twenty-Sixth Omnibus Claims Objection to Proofs of Claim (Insufficient Documentation, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Duplicate, and Reduced Claims)* (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

<sup>1</sup> The Debtors in these cases, along with the last four digits of 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.

The Objection is annexed hereto as **Exhibit A**. The Objection requests that the Bankruptcy Court disallow, expunge, modify, reduce, and/or reclassify one or more of your Claims<sup>2</sup> listed on the schedules (collectively, the “**Schedules**”) attached to **Exhibit 1** of the Objection on the grounds that such Claims:

- (i) were filed with insufficient documentation to establish their validity and/or are not supported by or consistent with the Debtors’ books and records (“**Insufficient Documentation Claims**”);
- (ii) have been filed against the wrong Debtor (“**Wrong Debtor Claims**”);
- (iii) in part or in full, are not entitled to the asserted status or other priority (“**Incorrectly Classified Claims**”);
- (iv) seek to recover amounts for which the Debtors are not liable (“**No Liability Claims**”);
- (v) (a) have been paid or otherwise satisfied by the Debtors after the Petition Date in accordance with the Bankruptcy Code, applicable rules, or an order issued by the Bankruptcy Court or (b) have been satisfied in full by a party that is not a Debtor (collectively, “**Satisfied Claims**”);
- (vi) are duplicative of other Claims (“**Duplicate Claims**”); and/or
- (vii) seek to recover amounts in excess of the accurate Claim amount (“**Reduced Claims**”).

Any Claim that the Bankruptcy Court expunges and disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof. Any Claim that the Bankruptcy Court modifies, reduces, and/or reclassifies will remain on the Claims Register as modified, reduced, and/or reclassified.

**PLEASE TAKE FURTHER NOTICE** that the *Court-Ordered Omnibus Claims Hearing Procedures* [ECF No. 904] (the “**Omnibus Claims Hearing Procedures**”), annexed hereto as **Exhibit B**, apply and govern the Objection to your Proof(s) of Claim. The Omnibus Claims Hearing

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

Procedures provide for certain mandatory actions by a claimant within certain time periods. Therefore, please review the Omnibus Claims Hearing Procedures carefully. Failure to comply with the Omnibus Claims Hearing Procedures may result in the disallowance, expungement, modification, reduction and/or reclassification of a Proof of Claim without further notice to a claimant.

If you do NOT oppose the disallowance, expungement, modification, and/or reclassification of your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection, then you do NOT need to file a written response to the Objection and you do NOT need to appear at the Hearing (as defined below).

If you DO oppose the disallowance, expungement, modification, reduction and/or reclassification of your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection, then you MUST file with the Bankruptcy Court and serve on the parties listed below a written response to the Objection (a “**Response**”) so that it is received on or before **December 17, 2021 at 4:00 p.m. (prevailing Eastern Time)** (the “**Response Deadline**”).

Your Response, if any, must contain at a minimum the following: (i) a caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number, and title of the Objection to which the response is directed; (ii) the name of the claimant and description of the basis for the amount of the Claim; (iii) a concise statement setting forth the reasons why the Claim should not be disallowed, expunged, modified, reduced and/or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which you will rely in opposing the Objection; (iv) all documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which you will rely in opposing the Objection; (v) the address(es) to which the Debtors must return any reply to

your Response, if different from that presented in the Proof of Claim; and (vi) the name, address, and telephone number of the person (which may be you or your legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on your behalf.

The Bankruptcy Court will consider a Response only if the Response is timely filed, served, and received. A Response will be deemed timely filed, served, and received only if prior to the Response Deadline, the Response is (a) filed electronically with the Bankruptcy Court on the docket of *In re Grupo Aeroméxico, S.A.B. de C.V., et al.*, Case No. 20-11563 (SCC), in accordance with the Bankruptcy Court's General Order M-399 (available on the Bankruptcy Court's website at <http://www.nysb.uscourts.gov>), by registered users of the Bankruptcy Court's electronic case filing ("ECF") system, (b) sent to the chambers of the Honorable Judge Shelley C. Chapman, United States Bankruptcy Court, One Bowling Green, New York, New York 10004; and (c) served (via email or otherwise) so as to be actually received on or before the Response Deadline upon (i) Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017 (Attn: Timothy Graulich (timothy.graulich@davispolk.com), Stephen D. Piraino (stephen.piraino@davispolk.com), Erik P. Jerrard (erik.jerrard@davispolk.com), and Richard J. Steinberg (richard.steinberg@davispolk.com)), counsel to the Debtors and (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Brett H. Miller (bmiller@willkie.com), Todd M. Goren (tgoren@willkie.com), Craig Damast (cdamast@willkie.com), and Debra M. Sinclair (dsinclair@willkie.com)), counsel to the Official Committee of Unsecured Creditors appointed in these cases.

Except as otherwise permitted under the Omnibus Claims Hearing Procedures, a hearing (the "Hearing") will be held on **December 20, 2021 at 10:00 a.m. (prevailing Eastern Time)**, to consider the Objection. The Hearing will be held in the United States Bankruptcy Court for the

Southern District of New York. If you file a written Response to the Objection, you should plan to appear at the Hearing. The Debtors, however, reserve the right to continue the Hearing on the Objection with respect to your Claim(s). If the Debtors do continue the Hearing with respect to your Claim(s), then the Hearing will be held at a later date. If the Debtors do not continue the Hearing with respect to your Claim(s), then the Hearing on the Objection will be conducted on the above date.

The Debtors have the right to object to your Claim(s) listed on the Schedules attached to Exhibit 1 of the Objection (or to any other Claims you may have filed) at a later date on grounds not asserted in the Objection unless the Bankruptcy Court disallows and expunges your Claim(s). You will receive a separate notice of any such objections.

Responding parties shall attend the Hearing telephonically so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court. You may participate in the Hearing telephonically by making arrangements through CourtSolutions, LLC ([www.court-solutions.com](http://www.court-solutions.com)). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.<sup>3</sup>

If you wish to view the complete Objection, you can do so for free at <https://dm.epiq11.com/aeromexico>. **CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE BANKRUPTCY COURT TO DISCUSS THE MERITS OF THEIR CLAIMS.**

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<sup>3</sup> A copy of General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/court-operations-under-exigent-circumstances-created-covid-19>.

Dated: November 17, 2021  
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich  
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New York, New York 10017  
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Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*

**Exhibit A**

**Objection**

DAVIS POLK & WARDWELL LLP  
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*Counsel to the Debtors  
and Debtors in Possession*

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

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**DEBTORS' TWENTY-SIXTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF  
CLAIM (INSUFFICIENT DOCUMENTATION, WRONG DEBTOR, INCORRECTLY  
CLASSIFIED, NO LIABILITY, SATISFIED, DUPLICATE, AND REDUCED CLAIMS)**

\* \* \*

TO THE CLAIMANTS LISTED ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER (ATTACHED HERETO AS EXHIBIT 1): YOUR RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION(S) THAT MAY BE FILED BY THE DEBTORS. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS' RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST THE CLAIMS LISTED ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE SCHEDULES ATTACHED TO THE PROPOSED ORDER.

\* \* \*

Grupo Aeroméxico S.A.B. de C.V. (“**Grupo Aeroméxico**”) and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**”) hereby file this *Twenty-*

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<sup>1</sup> 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.



*Sixth Omnibus Claims Objection to Proofs of Claim (Insufficient Documentation, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Duplicate, and Reduced Claims)* (the “**Objection**”), pursuant to the *Order Approving (I) Omnibus Claims Objection Procedures, (II) Omnibus Claims Settlement Procedures and (III) Omnibus Claims Hearing Procedures* [ECF No. 904] (the “**Claims Objections Procedures Order**”). This Objection is supported by the *Declaration of Ricardo Javier Sánchez Baker in Support of the Twenty-Sixth Omnibus Claims Objection to Proofs of Claim (Insufficient Documentation, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Duplicate, and Reduced Claims)* (the “**Sánchez Declaration**”), attached hereto as **Exhibit 2** and incorporated herein by reference. In further support of the Objection, the Debtors respectfully state as follows:

### **Relief Requested**

1. By this Objection, and pursuant to sections 105 and 502 of title 11 of the United States Code (the “**Bankruptcy Code**”), rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and the Claims Objections Procedures Order, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit 1** (the “**Proposed Order**” and, if entered, the “**Order**”), disallowing, expunging, modifying, reducing, and/or reclassifying each of the claims identified on the schedules attached to the Proposed Order (collectively, the “**Schedules**”), as set forth therein.<sup>2</sup>

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Southern District of New York (the “**Court**”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the

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<sup>2</sup> The Schedules are incorporated herein by reference.

*Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and, pursuant to Bankruptcy Rule 7008, the Debtors consent to entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter a final order or judgment consistent with Article III of the United States Constitution.

3. The legal predicates for the relief requested herein are sections 105 and 502 of the Bankruptcy Code, and Bankruptcy Rule 3007.

4. Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Background**

#### **A. General Background**

5. On June 30, 2020 (the “**Petition Date**”), the Debtors each commenced in this Court a voluntary case (the “**Chapter 11 Cases**”) under chapter 11 of title 11 of the United States Code. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors in possession pursuant to Bankruptcy Code §§ 1107(a) and 1108.

6. The Debtors’ Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

7. On July 13, 2020, the United States Trustee formed an Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”) in the Chapter 11 Cases. No trustee or examiner has been appointed in the Chapter 11 Cases.

8. The Court entered a (i) *Final Order Authorizing (I) Debtors to Honor Prepetition Obligations to Customers and Related Third Parties and to Otherwise Continue Customer Programs*, (II) *Relief from Stay to Permit Setoff in Connection with the Customer Programs and (III) Financial Institutions to Honor and Process Related Checks and Transfers* [ECF No. 205] (the

“**Customer Programs Order**”); (ii) *Final Order Authorizing (I) Debtors to Pay Certain Prepetition Taxes, Governmental Assessments and Fees and (II) Financial Institutions to Honor and Process Related Checks and Transfers* on July 29, 2020 [ECF No. 206] (the “**Taxes Order**”); (iii) *Final Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed With Outstanding Workers’ Compensation Claims And (III) Financial Institutions to Honor and Process Related Checks and Transfers* on July 30, 2020 [ECF No. 216] (the “**Wages Order**”); and (iv) *Final Order Authorizing (I) Payment of Certain Prepetition Claims of Critical Vendors and Foreign Vendors and (II) Financial Institutions to Honor and Process Related Checks and Transfers* on August 20, 2020 [ECF No. 309] (the “**Critical Vendors Order**” and together with the Customer Programs Order, Taxes Order, and Wages Order, the “**First Day Orders**”).

9. Detailed information regarding the Debtors’ business, capital structure, and the circumstances leading to the commencement of these Chapter 11 Cases, is set forth in the *Declaration of Ricardo Javier Sánchez Baker in Support of the Debtors’ Chapter 11 Petitions and First Day Pleadings* [ECF No. 20], filed with the Court on the Petition Date.

**B. Claims Resolution Process in the Chapter 11 Cases**

10. On July 2, 2020, the Court entered an *Order Authorizing Debtors to Retain and Employ Epiq Corporate Restructuring, LLC as Claims and Noticing Agent Nunc Pro Tunc to the Petition Date* [ECF No. 47], thereby appointing Epiq Corporate Restructuring, LLC (“**Epiq**”) as the Debtors’ claims and noticing agent in these Chapter 11 Cases.

11. On August 25, 2020, the Debtors filed their respective schedules of assets and liabilities [ECF Nos. 326, 328, 330, 332] and statements of financial affairs [ECF Nos. 327, 329,

331, 333] (collectively, the “**Chapter 11 Schedules**” and “**Statements**,” respectively). On August 28, 2020, the Debtors filed an amendment to the Statement filed by Debtor Aerovías de México, S.A. de C.V. [ECF No. 342]. The Debtors filed amendments to certain of the Debtors’ Chapter 11 Schedules on December 17, 2020 [ECF Nos. 737–40], as well as on January 15, 2021 [ECF Nos. 808–10].

12. On November 18, 2020, the Court entered an *Order (I) Establishing Deadline for Filing Proofs of Claim and Procedures Relating Thereto and (II) Approving the Form and Manner of Notice Thereof* [ECF No. 648] (the “**Bar Date Order**”) establishing January 15, 2021 at 5:00 p.m. (prevailing Pacific Time) as the General Bar Date (as defined in the Bar Date Order) (the “**Bar Date**”).

13. On December 11, 2020, Epiq duly served the *Notice of Deadline Requiring Filing of Proofs of Claim on or Before January 15, 2021* [ECF No. 778] (the “**Bar Date Notice**”). Between December 14, 2020 and December 16, 2020, the Debtors caused the Bar Date Notice to be published in the *New York Times International Edition*, the *New York Times*, and the *Wall Street Journal*. See Noblesala Aff., ECF No. 759; Noblesala Aff., ECF No. 760; Bell Aff., ECF No. 761.

14. In the ordinary course of business, the Debtors maintain books and records (the “**Books and Records**”) that reflect, among other things, the Debtors’ liabilities and the amounts thereof owed to their creditors.

15. The Debtors’ claims register (the “**Claims Register**”), prepared and maintained by Epiq, reflects that approximately 6,053 proofs of claim (collectively, the “**Proofs of Claim**”) have been filed in the Chapter 11 Cases asserting claims against the Debtors (each a “**Claim**,” and collectively, the “**Claims**”). The Debtors and their advisors are continuing to comprehensively review and reconcile all Claims, including both the Claims listed on the Debtors’ Chapter 11

Schedules and the Claims asserted in the Proofs of Claim (including any supporting documentation) filed in the Chapter 11 Cases. The Debtors and their advisors are also comparing the Claims asserted in the Proofs of Claims with the Debtors' Books and Records to determine the validity of the asserted Claims.

16. This reconciliation process includes identifying particular categories of Claims that the Debtors believe should be modified, reduced, reclassified, disallowed, and/or expunged. To avoid a possible double recovery or otherwise improper recovery by claimants, the Debtors will continue to file omnibus objections to such categories of Claims if and where warranted. This Objection is one such omnibus objection.

17. On February 17, 2021, the Court entered the Claims Objections Procedures Order [ECF No. 904]. Subsequently, the Court has sustained 25 omnibus claims objections filed by the Debtors in accordance the Claims Objections Procedures Order. *See* ECF Nos. 1086–87, 1102, 1207–08, 1403–04, 1575, 1577–78, 1580–85, 1755, 1771, 2133, 2137, 2139–43.

18. The Debtors submit that this Objection and the notice provided to claimants in connection hereto are consistent with the Claims Objections Procedures Order, the Bankruptcy Code, and the Bankruptcy Rules.

### **Basis for Relief**

19. Pursuant to section 101 of the Bankruptcy Code, a creditor holds a claim against a bankruptcy estate only to the extent that (a) it has a “right to payment” for the asserted liabilities and (b) the claim is otherwise allowable. 11 U.S.C. §§ 101(5) and 101(10).

20. When asserting a claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Lehman Bros. Holdings, Inc.*, 602 B.R. 564, 574 (Bankr. S.D.N.Y. 2019); *In re Int'l Match Corp.*, 69 F.2d 73, 76

(2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. See *In re Lehman Bros.*, 602 B.R. at 574. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim's *prima facie* validity. See *In re Dreier LLP*, 544 B.R. 760, 766 (Bankr. S.D.N.Y. 2016), *aff'd*, No. 08-15051 (SMB), 2016 WL 3920358 (S.D.N.Y. July 15, 2016), *aff'd*, 683 F. App'x 78 (2d Cir. 2017) (quoting *Creamer v. Motors Liquidation Co. GUC Trust (In re Motors Liquidation Co.)*, No. 12 CIV. 6074 (RJS), 2013 WL 5549643, at \*3 (S.D.N.Y. Sept. 26, 2013) (in turn quoting *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992))). In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim's legal sufficiency. See *In re Dreier*, 544 B.R. at 766. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. See *id.*

21. A court should not deem a claim to be allowable if it is "unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1). A debtor may file an omnibus claims objection if all the claims being objected to fall under one of several listed categories as described in the Bankruptcy Rules and the Claims Objections Procedures Order. See Fed. R. Bankr. P. 3007(d); Claims Obj. Proc. Order, ¶ 2(a), ECF No. 904 (providing additional bases under which the Debtors may file omnibus claim objections).

**Objection**

22. By this Objection, the Debtors object to the Claims set forth on the Schedules as follows:

<b>Schedule</b>	<b>Objection Basis</b>
1	Insufficient Documentation Claims <sup>3</sup>
2	Wrong Debtor Claims
3	Incorrectly Classified Claims
4	No Liability Claims
5	Satisfied Claims
6	Duplicate Claims
7	Reduced Claims

**A. Insufficient Documentation Claims**

23. The Debtors object to the Claims listed on Schedule 1 and request that each such Insufficient Documentation Claim be disallowed and expunged in its entirety. Based on a review of the Insufficient Documentation Claims and the supporting documentation provided in connection therewith (if any), the Debtors have determined that each Insufficient Documentation Claim “fails to specify sufficiently the basis for the claim or provide sufficient supporting documentation for such claim.” Claims Obj. Proc. Order, ¶ 2(a)(ii).

24. Without providing sufficient information or documentation to allow the Debtors to reconcile the proofs of claim, the Insufficient Documentation Claims fail to satisfy the requirements for a proof of claim. Although the Debtors have attempted to compare the Insufficient Documentation Claims with their Books and Records, the Insufficient Documentation Claims do not contain enough information to allow the Debtors to determine what amount (if any) is valid and owed to the Insufficient Documentation claimants by the Debtors.

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<sup>3</sup> Each capitalized term used in this paragraph 22 shall have the meaning ascribed to such term in this Objection.

25. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on account of the Insufficient Documentation Claims at the expense of the Debtors and other creditors, the Debtors respectfully request that each Insufficient Documentation Claim be disallowed and expunged in its entirety.

**B. Wrong Debtor Claims**

26. The Debtors object to the Claims listed on Schedule 2 as such Claims were each filed against an incorrect Debtor according to the Debtors' Books and Records ("**Wrong Debtor Claims**"), and request that each Wrong Debtor Claim be modified as Claims against the proper Debtor.

27. A court should not deem a claim to be allowable if it is "unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1). Moreover, the Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to claims "filed against ... the wrong Debtor." Claims Obj. Proc. Order, ¶ 2(a)(iii).

28. After analyzing each Wrong Debtor Claim and reviewing the Books and Records, the Debtors have determined that each Wrong Debtor Claim has been filed against the incorrect Debtor. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on a Claim, the Debtors seek to modify the Wrong Debtor Claims by reassigning the Claim from the Debtor against which such Claim was originally filed to the Debtor identified in the "Correct Debtor" column applicable thereto on Schedule 2.

**C. Incorrectly Classified Claims**

29. The Debtors object to the Claims listed on Schedule 3 and request that each such Claim be reclassified as set forth therein, as each of these Claims is not entitled to the asserted status or other priority ("**Incorrectly Classified Claims**").



30. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections to Claims for which “[t]he claimant is not entitled to the asserted secured status or other priority.” Claims Obj. Proc. Order, ¶ 2(a)(v). After analyzing each Incorrectly Classified Claim and any documentation provided therewith, and after reviewing the Books and Records, the Debtors have determined that each Incorrectly Classified Claim, in part or in full, (i) does not accurately reflect the correct classification according to the Debtors’ Books and Records; (ii) was filed with insufficient documentation to support the asserted status or other priority thereon; and/or (iii) asserts a status or other priority that is not supported by the Bankruptcy Code or other applicable law. The specific basis for objection to each Incorrectly Classified Claim is set forth on Schedule 3 in the column labeled “Reason.”

31. The Debtors respectfully request that the Incorrectly Classified Claims be reclassified as set forth on Schedule 3 in the corresponding row labeled “Modified Claim,” to avoid claimants from improperly receiving recoveries on account of an Incorrectly Classified Claim at the expense of the Debtors and other creditors.

**D. No Liability Claims**

32. The Debtors object to the Claims listed on Schedule 4 and request that each such Claim be disallowed and expunged in its entirety, as such Claims seek to recover amounts for which the Debtors are not liable (“**No Liability Claims**”).

33. A court should not deem a claim to be allowable if it is “unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). After analyzing each No Liability Claim and reviewing the Books and Records, the Debtors have determined that the No Liability Claims (i) fail to establish a basis for a valid claim against the

Debtors and (ii) seek recovery for amounts for which the Debtors are not liable. The specific basis for objection to each No Liability Claim is set forth on Schedule 4 in the column labeled “Reason.”

34. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries on account of the No Liability Claims at the expense of the Debtors and other creditors, the Debtors respectfully request that each No Liability Claim be disallowed and expunged in its entirety.

**E. Satisfied Claims**

35. The Debtors object to the Claims listed on Schedule 5 (the “**Satisfied Claims**”) and request that each such Satisfied Claim be disallowed and expunged in its entirety, as (i) each Satisfied Claim has been paid or otherwise satisfied by the Debtors after the Petition Date, “in accordance with the Bankruptcy Code, applicable rules, or a court order,” see Fed. R. Bankr. P. 3007(d)(5), including pursuant to the Court’s First Day Orders, or (ii) has been satisfied in full by a party that is not a Debtor.

36. As the Debtors do not owe any further amounts with respect to the Satisfied Claims, to avoid the same claimant from improperly receiving multiple recoveries at the expense of the Debtors and other creditors, the Debtors request that the Satisfied Claims be disallowed and expunged in their entirety.

**F. Duplicate Claims**

37. The Debtors object to the Claims listed on Schedule 6 and request that such Claims be disallowed and expunged in their entirety as such Claims are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability (“**Duplicate Claims**”).

38. A debtor cannot be required to pay the same claim multiple times. *See, e.g., Phelan v. Local 305 of United Ass’n of Journeymen & Apprentices of Plumbing and Pipefitting Indus. of*

*U.S. & Can.*, 973 F.2d 1050, 1063 (2d Cir. 1992); *see also In re Finley, Kumble, Wagner, Heine, Underberg, Manley, Myerson & Carey*, 160 B.R. 882, 894 (Bankr. S.D.N.Y. 1993) (“In bankruptcy, multiple recoveries for an identical injury are generally disallowed.”). This Court has routinely sustained objections to duplicative claims. *See, e.g.*, ECF Nos. 1102, 1208, 1575, 1755, 1771, 2133; *see also In re LATAM Airlines Group S.A.*, No. 20-11254 (JLG) (Bankr. S.D.N.Y. Aug 3, 2021) [ECF No. 2846]; *In re Centric Brands, Inc.*, No. 20-22637 (SHL) (Bankr. S.D.N.Y. June 15, 2021) [ECF No. 926]; *In re Ditech Holding Corp.*, No. 19-10412 (JLG) (Bankr. S.D.N.Y. Apr. 12, 2021) [ECF No. 3317].

39. If the Duplicate Claims identified on Schedule 6 are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. By this Objection, the Debtors seek disallowance and expungement of the Duplicate Claims in order to limit each claimant to a single Claim and recovery against the applicable Debtor’s estate arising from the same alleged liability.

40. For each Duplicate Claim, the Debtors have identified a surviving Claim (“**Surviving Claim**”), which asserts the same liability and is identified on Schedule 6 in the applicable row labeled “Surviving Claim.” Surviving Claims will be unaffected by the relief requested in this Objection, and each claimant’s rights to assert these liabilities against the applicable Debtor’s estate will be preserved, subject to the Debtors’ reservations of their rights to object to such Surviving Claims and other Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

#### **G. Reduced Claims**

41. The Debtors object to the Claims listed on Schedule 7 and request that each such Claim be modified, as each such Claim (i) seeks to recover amounts in excess of what is reflected on

the Debtors' Books and Records and/or (ii) was filed with insufficient documentation to support the asserted Claim amount (collectively, "**Reduced Claims**").

42. The Claims Objections Procedures Order authorizes the Debtors to file omnibus claims objections if "[t]he amount claimed is inconsistent with the Debtors' books and records and the Debtors, after review and consideration of any information provided by the claimant, deny liability in excess of the amount reflected in the Debtors' books and records" and/or if a claimant "fails to specify sufficiently the basis for the claim or provide sufficient supporting documentation for such claim." Claims Obj. Proc. Order, ¶ 2(a)(i) and (ii). After analyzing each of the Reduced Claims and any documentation provided therewith, the Debtors have determined that the asserted amount of each of Reduced Claim is greater than what the Debtors' reflect on their Books and Records and/or is not supported by the documentation provided by the claimant.

43. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants from improperly receiving recoveries in excess of what they are entitled at the expense of the Debtors and other creditors, the Debtors respectfully request that the Court modify the amount of the Reduced Claims such that the amount of each Reduced Claim corresponds with the documentation provided with the asserted proof of claim (the "**Reduction**"), as set forth in more detail on Schedule 7 in the corresponding row labeled "Reduced Claim."

#### **Separate Contested Matters**

44. Each of the Claims and the Objection with respect thereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtors request that any order entered by this Court with respect to a request for disallowance, expungement, modification, reduction, and/or reclassification herein shall be deemed a separate order with respect to each Claim.

**Response to Omnibus Objections**

45. To contest this Objection, a claimant must file and serve a written response to this Objection (a “**Response**”) so that it is received no later than the deadline set forth in the accompanying notice (the “**Response Deadline**”). All Responses shall be filed electronically with the Court on the docket of *In re Grupo Aeroméxico, S.A.B. de C.V., et al.*, Case No. 20-11563 (SCC), in accordance with the Court’s General Order M-399 (available on the Court’s website at <http://www.nysb.uscourts.gov>), by registered users of the Court’s electronic case filing (“ECF”) system, and served (via email or otherwise) so as to be actually received on or before the Response Deadline upon:

Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, New York 10017  
Attn: Timothy Graulich (timothy.graulich@davispolk.com)  
Stephen D. Piraino (stephen.piraino@davispolk.com)  
Erik P. Jerrard (erik.jerrard@davispolk.com)  
Richard J. Steinberg (richard.steinberg@davispolk.com)  
*Counsel to the Debtors*

-and-

Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, New York 10019  
Attn: Brett H. Miller (bmiller@willkie.com)  
Todd M. Goren (tgoren@willkie.com)  
Craig Damast (cdamast@willkie.com)  
Debra M. Sinclair (dsinclair@willkie.com)  
*Counsel to the Creditors’ Committee.*

46. Every Response to this Objection must contain, at a minimum, the following information:

- a. A caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number, and title of the Objection to which the response is directed;

- b. The name of the claimant and a description of the basis for the amount of the Claim;
- c. A concise statement setting forth the reasons why the Claim should not be disallowed, expunged, reduced, or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which will be relied on in opposing the Objection;
- d. All documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which will be relied on in opposing the Objection; and
- e. The address(es) to which the Debtors must return any reply to the Response, if different from that presented in the Proof of Claim; and
- f. The name, address, and telephone number of the person (which may be the claimant or their legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on the claimant's behalf.

47. If a claimant fails to file and serve a timely Response by the Response Deadline, the Debtors may present to the Court an appropriate order disallowing, expunging, modifying, reducing, and/or reclassifying their Claim(s), without further notice or a hearing.

#### **Reservation of Rights**

48. The Debtors expressly reserve the right to amend, modify, or supplement this Objection, including, without limitation, to modify the currency associated with each Claim set forth on the Schedules. The Debtors further reserve their right to object to the: (i) Insufficient Documentation Claims; (ii) Wrong Debtor Claims; (iii) Incorrectly Classified Claims; (iv) No Liability Claims; (v) Satisfied Claims; (vi) Duplicate Claims; and/or (vii) Reduced Claims on any other grounds that the Debtors discover or elect to pursue, unless such Claims are disallowed and expunged from the Claims Register. The Debtors reserve their right to assert substantive and/or one or more additional non-substantive objections to the Claims subject to this Objection at a later time.

49. Notwithstanding anything contained in this Objection, the exhibits attached hereto, or the Schedules, nothing herein shall be construed as a waiver of any rights that the Debtors may have

to (i) commence avoidance actions under the applicable sections of the Bankruptcy Code, including, but not limited to, sections 547 and 548 of the Bankruptcy Code, against the claimants subject to this Objection, (ii) enforce the Debtors' rights of setoff against the claimants relating to such avoidance actions, or (iii) seek disallowance pursuant to section 502(d) of the Bankruptcy Code of Claims of the claimants that are subject to such avoidance actions.

**Notice**

50. Notice of this Objection will be given to (i) the United States Trustee for the Southern District of New York; (ii) each party listed on the Schedules; (iii) each party listed in paragraph 2(h) of the Claims Objections Procedures Order; and (iv) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

**No Prior Request**

51. The Debtors have not previously sought the relief requested herein from the Court or any other court.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as **Exhibit 1**, granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: November 17, 2021  
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

450 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 450-4000  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik Jerrard (admitted *pro hac vice*)

*Counsel to the Debtors  
and Debtors in Possession*



**Exhibit 1 to Objection**

**Proposed Order**

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

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**ORDER GRANTING DEBTORS' TWENTY-SIXTH OMNIBUS CLAIMS  
OBJECTION TO PROOFS OF CLAIM (INSUFFICIENT DOCUMENTATION,  
WRONG DEBTOR, INCORRECTLY CLASSIFIED, NO LIABILITY,  
SATISFIED, DUPLICATE, AND REDUCED CLAIMS)**

Upon the objection (the “**Objection**”)<sup>2</sup> of the above-captioned Debtors, pursuant to sections 105 and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, seeking to (a) modify, reduce, and/or reclassify the Claims identified on Schedules 2, 3, and 7, attached hereto, as described therein and (b) disallow and expunge the Claims identified on Schedules 1, 4, 5, and 6 attached hereto; 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

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<sup>1</sup> 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.

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

other or further notice need be provided; and the Court having reviewed and considered the Objection; and the Court having the opportunity to hold a hearing on 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 Claims identified on **Schedule 1** annexed hereto are hereby disallowed and expunged in their entirety.
3. The Claims identified on **Schedule 2** 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(s)” applicable thereto on **Schedule 2**.
4. The Incorrectly Classified Claims identified on **Schedule 3** annexed hereto are hereby reclassified as described in the corresponding row labeled “Modified Claim” on **Schedule 3** 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.
5. The No Liability Claims identified on **Schedule 4** annexed hereto are hereby disallowed and expunged in their entirety.
6. The Satisfied Claims identified on **Schedule 5** annexed hereto are hereby disallowed and expunged in their entirety.

7. The Duplicate Claims identified on Schedule 6 annexed hereto are hereby disallowed and expunged in their entirety.

8. The Reduced Claims identified on Schedule 7 annexed hereto are hereby modified and reduced as set forth therein, and shall be reflected in the Claims Register in the amounts set forth on Schedule 7 in the column labeled “Reduced Claim Amount.”

9. All Claims identified on Schedule 6 annexed hereto as a “Surviving Claim” will be unaffected by the relief granted herein, and the claimants’ rights to assert the liabilities in connection with the Surviving Claims against the applicable Debtor’s estate will be preserved, subject to the Debtors’ reservations of their rights to object to such Surviving Claims on all grounds, whether legal, factual, procedural, substantive, or non-substantive.

10. 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.

11. 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.

12. 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.

13. 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

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THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE

**Schedule 1**

**Insufficient Documentation Claims**

**Schedule 1****Insufficient Documentation Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	20184	No	Aerovías de México, S.A. de C.V.	CAROLINE GARBAY & TIFFANY LOLA ROUSSEL ***NO ADDRESS PROVIDED*** TAIPEI 100 TAIWAN	0.00	0.00	0.00	37,740.00	37,740.00 USD	No
	<b>Date Filed:</b>	1/6/2021								
2	20494	No	Aerovías de México, S.A. de C.V.	PEREZ, LAURA ELENA SAUCEO RICARDO PEART 187 EL BALUARTE SALTILLO CZ 25297 MEXICO	0.00	0.00	0.00	134,000.00	134,000.00 USD	No
	<b>Date Filed:</b>	1/20/2021								
3	20513	No	Grupo Aeroméxico, S.A.B. de C.V.	PONCE, MIGUEL ANGEL VILLANUEVA FRAY DIEGO DE LA MAGDALENA 655 LAS AGUILAS 2A SECCION SAN LUIS POTOSI 78279 MEXICO	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	2/8/2021								
4	10511	No	Grupo Aeroméxico, S.A.B. de C.V.	SUNGHUNYEO 858,HOGUPO-RO, 5-901,NAMDONG-GU, INCHEON 5-901 INCHEON 21542 SOUTH KOREA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/16/2020								
5	10317	No	Grupo Aeroméxico, S.A.B. de C.V.	VALADEZ, MARY L 7337 GOBERNADOR CANYON RD CARPINTERIA CA 93013	0.00	0.00	1,886.00	0.00	1,886.00 USD	No
	<b>Date Filed:</b>	12/9/2020								
<b>Insufficient Documentation Claim Totals</b>			<b>Count:</b>	<b>USD</b>	<b>5</b>	<b>0.00</b>	<b>0.00</b>	<b>1,886.00</b>	<b>171,740.00</b>	<b>173,626.00</b>

**Schedule 2**

**Wrong Debtor Claims**



**Wrong Debtor Claims**

Ref	Claim #	Transferred	Name and Address of Claimant	Wrong Debtor	Correct Debtor	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	10304		SAFRAN CABIN INC 11240 WARLAND DR CYPRESS, CA 90630	Aerovías Empresa de Cargo, S.A. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	89,406.07	89,406.07 USD	No
	<b>Date Filed:</b>	11/25/2020									
2	754		TRANSPERFECT TRANSLATIONS C/O METROGROUP 49 W MOUNT PLEASANT AVE, BOX 2371 LIVINGSTON, NJ 07039	Aerovías Empresa de Cargo, S.A. de C.V.	Aerovías de México, S.A. de C.V.	0.00	0.00	0.00	3,540.00	3,540.00 USD	No
	<b>Date Filed:</b>	8/3/2021									
<b>Wrong Debtor Claim Totals:</b>			<b>Count:</b>	<b>USD</b>	<b>2</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>92,946.07</b>	<b>92,946.07</b>	

**Schedule 3**

**Incorrectly Classified Claims**

**Incorrectly Classified Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	14848	No	Aerolitoral, S.A. de C.V.	ARRENDADORA LOS ANGELES VALLARTA SA DE C	13,593.01	0.00	13,593.01	0.00	13,593.01 USD	Yes	Insufficient documentation to support secured, priority claim.
	<b>Date Filed:</b> 4/13/2021			BOULEVARD COSTERO 800							
	<b>Modified Claim</b> 14848			COL FLAMINGOS LONDON SE28 8RU, UNITED KINGDOM	0.00	0.00	0.00	13,593.01	13,593.01 USD	Yes	
2	13521	No	Aerovías de México, S.A. de C.V.	BANCO NACIONAL DE MEXICO SA	60,874.70	0.00	0.00	0.00	60,874.70 USD	No	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/13/2021			C/O LATHAM & WATKINS LLP							
	<b>Modified Claim</b> 13521			ATTN KEITH A SIMON; MADELEINE PARISH 885 THIRD AVE NEW YORK, NY 10022	0.00	0.00	0.00	60,874.70	60,874.70 USD	No	
3	13528	No	Grupo Aeroméxico, S.A.B. de C.V.	BANCO NACIONAL DE MEXICO SA	60,874.70	0.00	0.00	0.00	60,874.70 USD	No	Insufficient documentation to support secured claim.
	<b>Date Filed:</b> 1/13/2021			C/O LATHAM & WATKINS LLP							
	<b>Modified Claim</b> 13528			ATTN KEITH A SIMON; MADELEINE PARISH 885 THIRD AVE NEW YORK, NY 10022	0.00	0.00	0.00	60,874.70	60,874.70 USD	No	
4	14567	No	Aerovías de México, S.A. de C.V.	BBVA BANCOMER SA	8,404,997.70	0.00	0.00	0.00	8,404,997.70 USD	Yes	Claim is related to unsecured promissory note
	<b>Date Filed:</b> 1/15/2021			ATTN ALEJANDRO JOSE CARDENAS BORTONI							
	<b>Modified Claim</b> 14567			AV PASEO DE LA REFORMA 510 PISO 45 COL JUAREZ CIUDAD DE MÉXICO 06600, MEXICO	0.00	0.00	0.00	8,404,997.70	8,404,997.70 USD	Yes	
<b>Incorrectly Classified Claims Total</b>				<b>Count:</b>	<b>USD</b>	<b>4</b>	<b>8,540,340.11</b>	<b>0.00</b>	<b>13,593.01</b>	<b>0.00</b>	<b>8,540,340.11</b>

**Schedule 4**

**No Liability Claims**

**No Liability Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	10257	No	Aerolitoral, S.A. de C.V.	MISSION AIR SUPPORT INC ATTN MS DEANNA WELD, ACCOUNTING 1260 TRAPPER CIR ROANOKE VA 24012	0.00	0.00	0.00	1,216,388.66	1,216,388.66 USD	No	Per Debtors' books and records, nothing is owed
	<b>Date Filed:</b>	9/30/2020									
2	20467	No	Aerovías de México, S.A. de C.V.	SUCHOWIECKY, SAMUEL 5135 BASCULE AVE WOODLAND HILLS CA 91364	0.00	0.00	0.00	599,887.00	599,887.00 Unknown	No	Claim is for outstanding mileage balance in a rewards program managed by a non-debtor. The bankruptcy has not affected claimant's mileage balance.
	<b>Date Filed:</b>	1/15/2021									
3	13432	No	Aerovías de México, S.A. de C.V.	TX COMPTROLLER UNCLAIMED PROPERTY DIV C/O OFFICE OF THE TEXAS ATTORNEY GENERAL ATTN AAG JASON B BINFORD PO BOX 12548 MC008 AUSTIN TX 78711	0.00	0.00	0.00	91,754.75	91,754.75 USD	Yes	Per Debtors' books and records, there is no unclaimed property to report
	<b>Date Filed:</b>	1/13/2021									
4	13435	No	Aerolitoral, S.A. de C.V.	TX COMPTROLLER UNCLAIMED PROPERTY DIV C/O OFFICE OF THE TEXAS ATTORNEY GENERAL ATTN AAG JASON B BINFORD PO BOX 12548 MC008 AUSTIN TX 78641	0.00	0.00	0.00	91,754.75	91,754.75 USD	Yes	Per Debtors' books and records, there is no unclaimed property to report
	<b>Date Filed:</b>	1/13/2021									
5	13436	No	Aerovías Empresa de Cargo, S.A. de C.V.	TX COMPTROLLER UNCLAIMED PROPERTY DIV C/O OFFICE OF THE TEXAS ATTORNEY GENERAL ATTN AAG JASON B BINFORD PO BOX 12548 MC008 AUSTIN TX 78711	0.00	0.00	0.00	91,754.75	91,754.75 USD	Yes	Per Debtors' books and records, there is no unclaimed property to report
	<b>Date Filed:</b>	1/13/2021									
<b>No Liability Claim Totals</b>			<b>Count:</b>	<b>USD</b>	<b>4</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,491,652.91</b>	<b>1,491,652.91</b>	
				<b>Unknown</b>	<b>1</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>599,887.00</b>	<b>599,887.00</b>	

**Schedule 5**

**Satisfied Claims**

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	566000040	No	Aerovías Empresa de Cargo, S.A. de C.V.	AAACESA ALMACENES FISCALIZADOS SA DE CV A EN P AV 602 SIN NUMERO RF 23 ZONA FEDERAL AEROPUERTO INTERNAL VENUSTIANO CARRANZA CDMX 15620 MEXICO	0.00	0.00	0.00	10,037.99	10,037.99 USD	No
	<b>Date Filed:</b>	8/25/2020								
2	10264	No	Aerovías de México, S.A. de C.V.	ACCELYA FRANCE SAS BAT RENOIR - ZAC PARIS NORD 2 22, AVE DES NATIONS VILLEPINTE 93420 FRANCE	0.00	0.00	0.00	5,827.04	5,827.04 USD	No
	<b>Date Filed:</b>	10/5/2020								
3	14643	No	Aerolitoral, S.A.	AEROCOCINA SA DE CV ATTN DON E HINDERLITER II 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING TX 75039	0.00	0.00	0.00	42,728.58	42,728.58 USD	No
	<b>Date Filed:</b>	1/15/2021								
4	566000140	No	Aerovías Empresa de Cargo, S.A. de C.V.	AEROPUERTO DE ACAPULCO SA DE CV BLVD DE LAS NACIONES SN PLAN DE LOS AMATES ACAPULCO GUERRERO 39931 BRAZIL	0.00	0.00	0.00	4,098.10	4,098.10 USD	No
	<b>Date Filed:</b>	8/25/2020								
5	561009550	No	Aerovías de México, S.A. de C.V.	AGUILAR MELGAR AUGUSTO RONALDO BOULEVAR LOS PROCERES 24 69 ZONA 10 TORRE 4 NIVEL 4 OFICINA 407 EMPRESARIAL PRADERA GUATEMALA	0.00	0.00	0.00	16,778.46	16,778.46 USD	No
	<b>Date Filed:</b>	8/25/2020								
6	561009680	No	Aerovías de México, S.A. de C.V.	AIR CRUISE SERVICES INTERNACIONAL SA URBANIZACION ALBA MARIA B SAN MARTIN ALAJUELA SAN JOSE SAN JOSE COSTA RICA	0.00	0.00	0.00	25,493.91	25,493.91 USD	No
	<b>Date Filed:</b>	8/25/2020								
7	13030	No	Aerolitoral, S.A.	AIRLINE TECH REPS LLC 2000 NE JENSEN BEACH BLVD JENSEN BEACH FL 34957	0.00	0.00	0.00	33,355.00	33,355.00 USD	No
	<b>Date Filed:</b>	1/12/2021								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
8	561010290	No	Aerovías de México, S.A. de C.V.	AIRLINE TECH REPS LLC 2000 NE JENSEN BEACH BLVD JENSEN BEACH FL 34957	0.00	0.00	0.00	33,355.00	33,355.00 USD	No
	<b>Date Filed:</b> 8/25/2020									
9	561011470	No	Aerovías de México, S.A. de C.V.	ALPHA TECH AVIATION SERVICES INC 4233 UNITED PARKWAY SCHILLER PARK, IL 60176 SCHILLER PARK IL 60176	0.00	0.00	0.00	29,530.00	29,530.00 USD	No
	<b>Date Filed:</b> 8/25/2020									
10	561016690	No	Aerovías de México, S.A. de C.V.	AXA SEGUROS SA DE CV AV FELIX CUEVAS 366 PISO 6 TLACOQUEMECATL BENITO JUAREZ CDMX 3200 MEXICO	0.00	0.00	0.00	256,903.02	256,903.02 USD	No
	<b>Date Filed:</b> 8/25/2020									
11	566002090	No	Aerovías Empresa de Cargo, S.A. de C.V.	BORDERLESS AIRCARGO SA DE CV INSURGENTES SUR 800 INT LOCAL B PISO 9 DEL VALLE BENITO JUAREZ CDMX 3100 MEXICO	0.00	0.00	0.00	114,392.26	114,392.26 USD	No
	<b>Date Filed:</b> 8/25/2020									
12	561022070	No	Aerovías de México, S.A. de C.V.	CAMARA DE COMERCIO PERUANO MEXICANA AC AV JOSE PARDO 601 PISO 13 MIRAFLORES LIMA LIMA PERU	0.00	0.00	0.00	720.00	720.00 USD	No
	<b>Date Filed:</b> 8/25/2020									
13	561022120	No	Aerovías de México, S.A. de C.V.	CANADA BORDER SERVICES AGENCY 400 PLACE D'YOUVILLE 2ND FLOOR MONTREAL QUEBEC H2Y 2C2 CANADA	0.00	0.00	0.00	1,587.16	1,587.16 USD	No
	<b>Date Filed:</b> 8/25/2020									
14	13401	No	Aerovías Empresa de Cargo, S.A. de C.V.	CHAMP CARGOSYSTEMS (UK) LIMITED C/O SITA ATTN MICHAEL BECK 29 CHEMIN DE JOINVILLE, COITRIN GENEVA, 1216 SWITZERLAND	0.00	0.00	0.00	23,283.03	23,283.03 USD	No
	<b>Date Filed:</b> 1/13/2021									
15	561025080	No	Aerovías de México, S.A. de C.V.	CLARO CHILE SA AVENIDA DEL CONDOR 820 HUECHURABA SANTIAGO CHILE	0.00	0.00	0.00	729.41	729.41 USD	No
	<b>Date Filed:</b> 8/25/2020									



## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
16	561025090	No	Aerovías de México, S.A. de C.V.	CLARO CR TELECOMUNICACIONES SA POZOS DE SANTA ANA SAN JOSE COSTA RICA	0.00	0.00	0.00	499.51	499.51 USD	No
	<b>Date Filed:</b>	8/25/2020								
17	561028210	No	Aerovías de México, S.A. de C.V.	COOPERATIVA AUTOGESTIONARIA DE SERVICIOS AEROINDUSTRIALES RL 300 CESTE DEL AEROPUERTO INTERNACIONAL JUAN SANTA MARA ALAJUELA ALAJUELA SAN JOSE COLOMBIA	0.00	0.00	0.00	3,190.00	3,190.00 USD	No
	<b>Date Filed:</b>	8/25/2020								
18	561029250	No	Aerovías de México, S.A. de C.V.	CUEVA MEJIA ASOCIADOS S DE RL EDIFICIO MARTINEZ VALENZUELA NO 104 CALLE 2ERA AVE SO BARRIO EL CENTRO SAN PEDRO SULA HONDURAS	0.00	0.00	0.00	2,480.63	2,480.63 USD	No
	<b>Date Filed:</b>	8/25/2020								
19	561032280	No	Aerovías de México, S.A. de C.V.	DIRECCION GENERAL DE AERONAUTICA CIVIL MIGUEL CLARO 1314 PROVIDENCIA SANTIAGO REGION METROPOLITANA 7500000 CHILE	0.00	0.00	0.00	29,673.02	29,673.02 USD	No
	<b>Date Filed:</b>	8/25/2020								
20	561032290	No	Aerovías de México, S.A. de C.V.	DIRECCION GENERAL DE AERONAUTICA CIVIL AEROPUERTO LA AURORA SAN JOSE GUATEMALA GUATEMALA	0.00	0.00	0.00	1,830.52	1,830.52 USD	No
	<b>Date Filed:</b>	8/25/2020								
21	561032620	No	Aerovías de México, S.A. de C.V.	DOCTORS AT YOUR HOME INC 5201 BLUE LAGOON DRIVE SUITE 850 MIAMI FLORIDA 33126	0.00	0.00	0.00	250.00	250.00 USD	No
	<b>Date Filed:</b>	8/25/2020								
22	566004070	No	Aerovías Empresa de Cargo, S.A. de C.V.	ECS AERO CARGO INTERNACIONAL 7 RUE DU CERCLE ROISSYTECH 95703 ROISSY DDG CEDEX PARIS PARIS 95703 FRANCE	0.00	0.00	0.00	62,728.53	62,728.53 USD	No
	<b>Date Filed:</b>	8/25/2020								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
23	561033590	No	Aerovías de México, S.A. de C.V.	EDEN SPRINGS UK LIMITED UNIT B 3 LIVINGSTONE BOULEVARD HAMILTON INTERNATIONAL TECHNOLOGY PARK BLANTYRE GLASGOW G720BP GREAT BRITAIN	0.00	0.00	0.00	680.95	680.95 USD	No
	<b>Date Filed:</b>	8/25/2020								
24	561036890	No	Aerovías de México, S.A. de C.V.	ETAPEL SA DE CV CALIFORNIA 167 COYOACAN DISTRITO FEDERAL 4040 MEXICO	0.00	0.00	0.00	6,857.02	6,857.02 USD	No
	<b>Date Filed:</b>	8/25/2020								
25	566004350	No	Aerovías Empresa de Cargo, S.A. de C.V.	EXPEDITORS INTERNATIONAL OF WASHINGTON INC 1015 THIRD AVE 12TH FLOOR SEATTLE WA 98104	0.00	0.00	0.00	1,666.00	1,666.00 USD	No
	<b>Date Filed:</b>	8/25/2020								
26	14504	No	Aerovías de México, S.A. de C.V.	FLYTOUR BUSSINESS TRAVEL VIAGENS E AVENIDA JURUA 641 ALPHAVILLE-BARUERI SP 06455010 BRAZIL	0.00	0.00	0.00	44,064.39	44,064.39 USD	No
	<b>Date Filed:</b>	1/15/2021								
27	565014790	No	Aerolitoral, S.A. de C.V.	FRESHORIZE USA LLC 1511 E. STATE ROAD 434, SUITE 2001 WINTER SPRINGS FLORIDA 32708	0.00	0.00	0.00	29,116.80	29,116.80 USD	No
	<b>Date Filed:</b>	8/25/2020								
28	561042280	No	Aerovías de México, S.A. de C.V.	GLOBAL OPERADORA HOTELERA SAS AVENIDA CALLE 26 NO 59 15 BOGOTA COLOMBIA	0.00	0.00	0.00	1,896.43	1,896.43 USD	No
	<b>Date Filed:</b>	8/25/2020								
29	561046490	No	Aerovías de México, S.A. de C.V.	GRUPO ISSG SA DE CV GENERAL ANTONIO CARDENAS 741 ESCUADRON 201 IZTAPALAPA CDMX 9060 MEXICO	0.00	0.00	0.00	68,570.09	68,570.09 USD	No
	<b>Date Filed:</b>	8/25/2020								
30	565016080	No	Aerolitoral, S.A. de C.V.	GRUPO ISSG SA DE CV GENERAL ANTONIO CARDENAS 741 ESCUADRON 201 IZTAPALAPA CDMX 9060 MEXICO	0.00	0.00	0.00	3,513.10	3,513.10 USD	No
	<b>Date Filed:</b>	8/25/2020								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
31	566005350	No	Aerovías Empresa de Cargo, S.A. de C.V.	GRUPO ISSG SA DE CV GENERAL ANTONIO CARDENAS 741 ESCUADRON 201 IZTAPALAPA CDMX 9060 MEXICO	0.00	0.00	0.00	2,202.11	2,202.11 USD	No
	<b>Date Filed:</b>	8/25/2020								
32	565016550	No	Aerolitoral, S.A. de C.V.	HOSTAL DEL SOL SA DE CV BLVD LUIS DONALDO COLOSIO KM 12 5 SUPER MANZANA301 CANCUN QUINTANA ROO 77560 MEXICO	0.00	0.00	0.00	62.94	62.94 USD	No
	<b>Date Filed:</b>	8/25/2020								
33	561054250	No	Aerovías de México, S.A. de C.V.	HOTELES CASA INN SA DE CV RIO LERMA 237 CUAUHTEMOC CUAUHTEMOC CDMX 06500 MEXICO	0.00	0.00	0.00	369.52	369.52 USD	No
	<b>Date Filed:</b>	8/25/2020								
34	565016630	No	Aerolitoral, S.A. de C.V.	HOTELES CASA INN SA DE CV RIO LERMA 237 CUAUHTEMOC CUAUHTEMOC CDMX 06500 MEXICO	0.00	0.00	0.00	52,494.21	52,494.21 USD	No
	<b>Date Filed:</b>	8/25/2020								
35	561056360	No	Aerovías de México, S.A. de C.V.	ICTS GENERAL SERVICES SL AV MONTES DE OCA 19 NAVE 8 ENTRE PLANTA SAN SEBASTIAN DE LOS REYES MADRID 28700 SPAIN	0.00	0.00	0.00	13,854.46	13,854.46 USD	No
	<b>Date Filed:</b>	8/25/2020								
36	561058560	No	Aerovías de México, S.A. de C.V.	IRON MOUNTAIN DO BRASIL LTDA AV ERNESTO DE MORES 815 FIM DO CAMPO SAO PAULO 13240000 BRAZIL	0.00	0.00	0.00	681.40	681.40 USD	No
	<b>Date Filed:</b>	8/25/2020								
37	561058570	No	Aerovías de México, S.A. de C.V.	IRON MOUNTAIN ESPAÑA SAU AVENIDA DE LOS REYES CATOLICOS 6 POL IND VALGRANDE MADRID ALCOBENDAS 28108 SPAIN	0.00	0.00	0.00	248.77	248.77 USD	No
	<b>Date Filed:</b>	8/25/2020								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
38	561058670	No	Aerovías de México, S.A. de C.V.	IT SEEKERS SA DE CV AV UNIVERSIDAD 1001 P4 INT 10 BOSQUES DEL PRADO NORTE AGUASCALIENTES AGUASCALIENTES 20127 MEXICO	0.00	0.00	0.00	439,795.42	439,795.42 USD	No
<b>Date Filed:</b>	8/25/2020									
39	561061420	No	Aerovías de México, S.A. de C.V.	JET AIRCRAFT MAINTENANCE INC PO BOX 668965 MIAMI FL 33166	0.00	0.00	0.00	47,150.03	47,150.03 USD	No
<b>Date Filed:</b>	8/25/2020									
40	566006390	No	Aerovías Empresa de Cargo, S.A. de C.V.	K LINE LOGISTICS MEXICO SA DE CV MORELOS 176 PEÑON DE LOS BAÑOS CDMX CIUDAD DE MEXICO 15520 MEXICO	0.00	0.00	0.00	190.00	190.00 USD	No
<b>Date Filed:</b>	8/25/2020									
41	566006460	No	Aerovías Empresa de Cargo, S.A. de C.V.	KATERA SA DE CV CUAUHTEMOC 129 EL CERRITO CUATITLAN IZCALLI ESTADO DE MEXICO 54879 MEXICO	0.00	0.00	0.00	9,688.19	9,688.19 USD	No
<b>Date Filed:</b>	8/25/2020									
42	10138	No	Aerovías de México, S.A. de C.V.	LEAD LITE SAPI DE CV PROLONGACION 5 DE MAYO PARQUE INDUSTRIAL NAUCALPAN DE JUAREZ EDOMEX 53370 MEXICO	0.00	0.00	0.00	0.00	0.00 USD	Yes
<b>Date Filed:</b>	8/11/2020									
43	566006670	No	Aerovías Empresa de Cargo, S.A. de C.V.	LEAD LITE SAPI DE CV PROLONGACION 5 DE MAYO PARQUE INDUSTRIAL NAUCALPAN DE JUAREZ ESTADO DE MEXICO 53370 MEXICO	0.00	0.00	0.00	442.90	442.90 USD	No
<b>Date Filed:</b>	8/25/2020									
44	561066770	No	Aerovías de México, S.A. de C.V.	MAPFRE MEXICO SA AV PASEO DE LA REFORMA 243 CUAUHTEMOC CUAUHTEMOC CDMX 06500 MEXICO	0.00	0.00	0.00	138,082.64	138,082.64 USD	No
<b>Date Filed:</b>	8/25/2020									

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
45	561067630	No	Aerovías de México, S.A. de C.V.	MCL SERVICIOS Y MANTENIMIENTO DE AERONAVES SRL AEROPUERTO INTERNACIONAL DE LAS AMERICAS DR JFPG DEPOSITO 10 LAS AMERICA SANTO DOMINGO DOMINICAN REPUBLIC	0.00	0.00	0.00	6,715.27	6,715.27 USD	No
	<b>Date Filed:</b>	8/25/2020								
46	10148	No	Aerovías de México, S.A. de C.V.	MEDALLIA INC 575 MARKET ST, STE 1850 SAN FRANCISCO CA 94105	0.00	0.00	0.00	97,090.00	97,090.00 USD	No
	<b>Date Filed:</b>	8/13/2020								
47	561072790	No	Aerovías de México, S.A. de C.V.	MITSUMI SUMITOMO INSURANCE SHIN-KOKUSAI BLDG 8F 3-4-1 MARUNOUCHI CHIYODA-KU TOKYO 100-0005 JAPAN	0.00	0.00	0.00	49.10	49.10 USD	No
	<b>Date Filed:</b>	8/25/2020								
48	566007460	No	Aerovías Empresa de Cargo, S.A. de C.V.	MONTRA SA DE CV ESCUELA INDUSTRIAL 98 INDUSTRIAL GUSTAVO A MADERO DISTRITO FEDERAL 7800 MEXICO	0.00	0.00	0.00	28,623.94	28,623.94 USD	No
	<b>Date Filed:</b>	8/25/2020								
49	561073060	No	Aerovías de México, S.A. de C.V.	MOVERS SOLUCIONES INTEGRALES SC NORTE 182 INT 614 PENSADOR MEXICANO VENUSTIANO CARRANZA CIUDAD DE MEXICO 15510 MEXICO	0.00	0.00	0.00	24,522.37	24,522.37 USD	No
	<b>Date Filed:</b>	8/25/2020								
50	13396	No	Aerovías de México, S.A. de C.V.	NAKISA INC 733 RUE CATHCART MONTREAL QC H3B 1M6 CANADA	0.00	0.00	0.00	41,968.00	41,968.00 USD	No
	<b>Date Filed:</b>	1/13/2021								
51	561076690	No	Aerovías de México, S.A. de C.V.	OJEDA PESQUERA MARIA INES AV 2 NUM 274 LOCAL 1 SAN PEDRO DE LOS PINOS BENITO JUAREZ CDMX 3800 MEXICO	0.00	0.00	0.00	1,355.28	1,355.28 USD	No
	<b>Date Filed:</b>	8/25/2020								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
52	565020890	No	Aerolitoral, S.A. de C.V.	OJEDA PESQUERA MARIA INES AV 2 NUM 274 LOCAL 1 SAN PEDRO DE LOS PINOS BENITO JUAREZ CDMX 3800 MEXICO	0.00	0.00	0.00	1,413.32	1,413.32 USD	No
	<b>Date Filed:</b>	8/25/2020								
53	565021330	No	Aerolitoral, S.A. de C.V.	PAPELERA PRINCIPADO SA DE CV AV TLAHUAC NO 84 A SANTA ISABEL INDUSTRIAL IZTAPALAPA DISTRITO FEDERAL 9820 MEXICO	0.00	0.00	0.00	95.21	95.21 USD	No
	<b>Date Filed:</b>	8/25/2020								
54	561083270	No	Aerovías de México, S.A. de C.V.	PREFERRED COMPOSITE SERVICES INC 2900 NW 112 AVENUE UNIT 2 DORAL FL 33172	0.00	0.00	0.00	37,576.00	37,576.00 USD	No
	<b>Date Filed:</b>	8/25/2020								
55	561083560	No	Aerovías de México, S.A. de C.V.	PRODEX 10 RUE DU MEUNIER ROISSY FRANCIA 95723 FRANCE	0.00	0.00	0.00	24,722.33	24,722.33 USD	No
	<b>Date Filed:</b>	8/25/2020								
56	561084040	No	Aerovías de México, S.A. de C.V.	PUBLICACIONES METROPOLITANAS SAPI DE CV INSURGENTES SUR 716 PISO 10 DEL VALLE BENITO JUAREZ CDMX 3100 MEXICO	0.00	0.00	0.00	50,239.60	50,239.60 USD	No
	<b>Date Filed:</b>	8/25/2020								
57	561085590	No	Aerovías de México, S.A. de C.V.	RADIOMOVIL DIPSA SA DE CV LAGO ZURICH 245 EDIF TELCEL AMPLIACION GRANADA MIGUEL HIDALGO CDMX 11529 MEXICO	0.00	0.00	0.00	33,480.16	33,480.16 USD	No
	<b>Date Filed:</b>	8/25/2020								
58	561087040	No	Aerovías de México, S.A. de C.V.	RICOH COSTA RICA SA LA URUCA DE ROMERO FOURNIER 200 SUR 50 OESTE SAN JOSE SAN JOSE COSTA RICA	0.00	0.00	0.00	60.87	60.87 USD	No
	<b>Date Filed:</b>	8/25/2020								
59	561088390	No	Aerovías de México, S.A. de C.V.	SAFRAN NACELES SAS ROUTE DU PONT VIII BP 91 GONFREVILLE L'ORCHER 767000 FRANCE	0.00	0.00	0.00	5,083.00	5,083.00 USD	No
	<b>Date Filed:</b>	8/25/2020								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
60	561088430	No	Aerovías de México, S.A. de C.V.	SAKECUL SA DE CV AV AQUILES SERDAN NORTE 555 CENTRO CULIACAN DE ROSALES SINALOA 80000 MEXICO	0.00	0.00	0.00	704.74	704.74 USD	No
	<b>Date Filed:</b>	8/25/2020								
61	561090590	No	Aerovías de México, S.A. de C.V.	SERVICIOS DE ADMINISTRACION PREVISIONAL SA SANTIAGO SANTIAGO SANTIAGO CHILE	0.00	0.00	0.00	2,985.15	2,985.15 USD	No
	<b>Date Filed:</b>	8/25/2020								
62	561091000	No	Aerovías de México, S.A. de C.V.	SHANGHAI TAIKOO AIRCRAFT ENGINEERING SERVICES CO LTD 109 N°1 LING HANG ROAD PUDONG INTERNATIONAL AIRPORT PUDONG NEW AREA DISTRICT SHANGHAI SHANGHAI 210207 CHINA	0.00	0.00	0.00	96,307.38	96,307.38 USD	No
	<b>Date Filed:</b>	8/25/2020								
63	14651	No	Aerolitoral, S.A.	SKY CHEFS DE MEXICO SA DE CV ATTN DON E HINDERLITER II 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING TX 75039	0.00	0.00	0.00	42,728.58	42,728.58 USD	No
	<b>Date Filed:</b>	1/15/2021								
64	561095110	No	Aerovías de México, S.A. de C.V.	SUMITOMO INSURANCE SHIN-KOKUSAI BLDG 8F 3-4-1 MARUNOUCHI CHIYODA-KU TOKYO 100-0005 JAPAN	0.00	0.00	0.00	232.03	232.03 USD	No
	<b>Date Filed:</b>	8/25/2020								
65	565024200	No	Aerolitoral, S.A. de C.V.	SUPPLYING TOTAL TALENT SA 2DA CALLE RESIDENCIAL BOLONIA 29 DE LA OFICINA EMBAJADA DEL CANADA 20 VRS AL ESTE MANAGUA MANAGUA NICARAGUA	0.00	0.00	0.00	1,006.51	1,006.51 USD	No
	<b>Date Filed:</b>	8/25/2020								
66	561095910	No	Aerovías de México, S.A. de C.V.	TALLONE FEDERICO JOAQUIN 374 89 TH ST APT1 DALY CITY CA 94501	0.00	0.00	0.00	830.00	830.00 USD	No
	<b>Date Filed:</b>	8/25/2020								

## Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
67	565024300	No	Aerolitoral, S.A. de C.V.	TALMA MEXICO SERVICIOS AEROPORTUARIOS SA DE CV CAMINO ASA EDIFICIO NC 46 ZONA DE AGENCIAS ADUANALES AICM PENON DE LOS BANOS VENUSTIANO CARRANZA CDMX 15520 MEXICO	0.00	0.00	0.00	772.24	772.24 USD	No
	<b>Date Filed:</b>	8/25/2020								
68	561096220	No	Aerovías de México, S.A. de C.V.	TECHNICAL AIR SRL AVENIDA AVALOS 2148 6° PISO BUENOS AIRES BUENOS AIRES 1431 ARGENTINA	0.00	0.00	0.00	20,287.33	20,287.33 USD	No
	<b>Date Filed:</b>	8/25/2020								
69	561099520	No	Aerovías de México, S.A. de C.V.	US-MX INTERNATIONAL SERVICE INC 1605 WORLD TRADE CENTER LOOP LAREDO TX 78045	0.00	0.00	0.00	1,260.00	1,260.00 USD	No
	<b>Date Filed:</b>	8/25/2020								
70	565025010	No	Aerolitoral, S.A. de C.V.	US-MX INTERNATIONAL SERVICE INC 1605 WORLD TRADE CENTER LOOP LAREDO TX 78045	0.00	0.00	0.00	2,300.00	2,300.00 USD	No
	<b>Date Filed:</b>	8/25/2020								
71	561099630	No	Aerovías de México, S.A. de C.V.	VANCOUVER AIRPORT FUEL FACILITIES CORPORATION UNIT 108-12300 HORSESHOE WAY RICHMOND BC RICHMOND BC V7A 4Z1 CANADA	0.00	0.00	0.00	32,246.89	32,246.89 USD	No
	<b>Date Filed:</b>	8/25/2020								
72	561099740	No	Aerovías de México, S.A. de C.V.	VERGEZ SOTO ADVISORY SRL AVENIDA LOPE DE VEGA 13 APTO EDIF PROGRESO SUITE 505 SECTOR NACO DISTRITO NACIONAL SANTO DOMINGO 10124 DOMINICAN REPUBLIC	0.00	0.00	0.00	5,813.03	5,813.03 USD	No
	<b>Date Filed:</b>	8/25/2020								
73	599	No	Aerovías de México, S.A. de C.V.	WRIGHT INTERNATIONAL AMS INC 3182 ORLANDO DR, UNIT 14 MISSISSAUGA ON L4V 1R5 CANADA	0.00	0.00	0.00	70,488.45	70,488.45 USD	No
	<b>Date Filed:</b>	1/15/2021								



### Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
74	14519	No	Aerovías de México, S.A. de C.V.	WRIGHT INTERNATIONAL AMS INC 3182 ORLANDO DR, UNIT 14 MISSISSAUGA ON L4V 1R5 CANADA	0.00	0.00	0.00	70,448.45	70,448.45 USD	No
<b>Date Filed:</b>		1/15/2021								
<b>Satisfied Claim Totals</b>			<b>Count:</b>	<b>USD</b>	<b>74</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2,262,503.79</b>	<b>2,262,503.79</b>

**Schedule 6**

**Duplicate Claims**

**Duplicate Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
1	14645	No	Aerovías de México, S.A. de C.V.	AEROCOCINA SA DE CV ATTN DON E HINDERLITER II 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING, TX 75039	0.00	0.00	0.00	48,813.86	48,813.86 USD	No	
	Date Filed:	1/15/2021									
	Surviving Claim:	14655	No	Aerovías de México, S.A. de C.V.	SKY CHEFS DE MEXICO SA DE CV ATTN DON E HINDERLITER II 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING, TX 75039	0.00	0.00	0.00	368,978.02	368,978.02 USD	No
	Date Filed:	1/15/2021									
2	10554	No	Aerolitoral, S.A. de C.V.	ALVARADO Z, JUAN CARLOS KM 42 + 200 MTS AUTOPISTA AL AEROPUERTO INTERNACIONAL MONSEÑOR ROMERO SAN LUIS TALPA, LA PAZ SALVADOR, 01101, EL SALVADOR	0.00	0.00	0.00	14,238.39	14,238.39 USD	No	
	Date Filed:	12/18/2020									
	Surviving Claim:	11947	No	Aerolitoral, S.A. de C.V.	CRG FINANCIAL LLC TRANSFEROR: COCINA DE VUELOS SA DE CV 100 UNION AVENUE CRESSKILL, NJ 07626	0.00	0.00	0.00	14,238.39	14,238.39 USD	No
	Date Filed:	1/6/2021									
3	20528	No	Aerovías de México, S.A. de C.V.	FERRETERIA MODELO MEXICO SA DE CV VIA MORELOS 302 ECATEPEC DE MORELOS 55400, MEXICO	0.00	0.00	0.00	16,326.16	16,326.16 USD	Yes	
	Date Filed:	2/24/2021									
	Surviving Claim:	20538	No	Aerovías de México, S.A. de C.V.	FERRETERIA MODELO MEXICO SA DE CV VIA MORELOS 302 ECATEPEC DE MORELOS 55400, MEXICO	0.00	0.00	0.00	16,326.16	16,326.16 USD	No
	Date Filed:	4/12/2021									
4	379	No	Aerovías de México, S.A. de C.V.	FORMULARIOS DE MEXICO SA DE CV 33 AZTECAS NAUCALPAN 53150 MEXICO	0.00	0.00	0.00	6,468.60	6,468.60 USD	No	
	Date Filed:	1/14/2021									
	Surviving Claim:	14126	No	Aerovías de México, S.A. de C.V.	FORMULARIOS DE MEXICO SA DE CV AZTECAS 33, NAUCALPAN EDO DE MEXICO ME 53150,	0.00	0.00	0.00	6,468.60	6,468.60 USD	No
	Date Filed:	1/14/2021									

## Duplicate Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
5	14767	No	Aerovías de México, S.A. de C.V.	HOTELERA CORDILLERA LUZ SPA CALLE LUZ 2920 LAS CONDES SANTIAGO RM 7550024, CHILE	0.00	0.00	0.00	39,946.05	39,946.05 USD	No	
	Date Filed:	2/4/2021									
	Surviving Claim:	10034	No	Aerovías de México, S.A. de C.V.	HOTELERA CORDILLERA LUZ SPA CALLE LUZ 2920,COMUNA LAS CONDES SANTIAGO, 7550024 CHILE	0.00	0.00	0.00	39,946.05	39,946.05 USD	No
	Date Filed:	7/21/2020									
6	14851	No	Aerovías de México, S.A. de C.V.	MEXICANA DE ELECTRONICA INDUSTRIAL AVENIDA INSURGENTES SUR 810 COLONIA DEL VALLE BENITO JUAREZ CIUDAD DE MEXICO MX 03100, MEXICO	0.00	0.00	0.00	28,961.72	28,961.72 USD	No	
	Date Filed:	4/14/2021									
	Surviving Claim:	20478	No	Aerovías de México, S.A. de C.V.	MEXICANA DE ELECTRONICA INDUSTRIAL AVENIDA INSURGENTES SUR 810 COLONIA DEL VALLE BENITO JUAREZ CIUDAD DE MEXICO MX 03100, MEXICO	0.00	0.00	0.00	28,961.72	28,961.72 USD	No
	Date Filed:	1/15/2021									
7	14915	No	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	Yes	
	Date Filed:	8/21/2021									
	Surviving Claim:	14951	No	Aerovías de México, S.A. de C.V.	NAKAMURA, CHIHARU 138 CHARLTON BLVD NORTH YORK, ON M2R 2J1 CANADA	0.00	0.00	0.00	570.06	570.06 USD	No
	Date Filed:	10/14/2021									
7	43	No	Aerovías de México, S.A. de C.V.	RESIDENCE INN LV, HENDERSON/GREEN VALLEY ATTN WENDY MOLTON 2190 OLYMPIC AVE HENDERSON, NV 89014	0.00	0.00	0.00	48,666.84	48,666.84 USD	No	
	Date Filed:	8/10/2020									
	Surviving Claim:	10599	No	Aerovías de México, S.A. de C.V.	PACIFICA HENDERSON SUITES LLC 1775 HANCOCK ST, STE 200 SAN DIEGO, CA 92110	0.00	0.00	0.00	48,666.84	48,666.84 USD	No
	Date Filed:	12/21/2020									

**Duplicate Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	
8	14671	No	Aerolitoral, S.A. de C.V.	SKY CHEFS DE PANAMA SA ATTN DON E HINDERLITER II 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING, TX 75039	0.00	0.00	0.00	37,960.30	37,960.30 USD	No	
	Date Filed:	1/15/2021									
	Surviving Claim:	14620	No	Aerovías de México, S.A. de C.V.	SKY CHEFS DE PANAMA SA ATTN DON E HINDERLITER II, GEN COUNSEL 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING, TX 75039	0.00	0.00	0.00	37,960.30	37,960.30 USD	No
	Date Filed:	1/15/2021									
9	685	No	Aerovías de México, S.A. de C.V.	SUPERVISORES TECNICOS SA DE CV PROGRESO NUM EXT 115, INT 1ER PISO COL ESCANDON DELEG MIGUEL HIDALGO CIUDAD DE MEXICO 11800, MEXICO	0.00	0.00	0.00	0.00	0.00 USD	Yes	
	Date Filed:	1/11/2021									
	Surviving Claim:	153	No	Aerovías de México, S.A. de C.V.	SUPERVISORES TECNICOS SA DE CV 115 FIRST FLOOR PROGRESO MEXICO, 11800	0.00	0.00	0.00	11,693.28	11,693.28 USD	No
	Date Filed:	12/11/2020									
Duplicate Claims Total			Count:	USD	9	0.00	0.00	0.00	241,381.92	241,381.92	
				CAD	1	0.00	0.00	0.00	785.00	785.00	

**Schedule 7**

**Reduced Claims**

## Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
1	561011730	No	Aerovías de México, S.A. de C.V.	AMBROSIA LEON SA DE CV BLVD AVENIDA PERIFERICO SUR 3395 RINCON DEL PEDREGAL TLALPAN, CDMX 06500 MX	0.00	0.00	0.00	114,034.84	114,034.84 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b>	8/25/2020									
	<b>Reduced Claim:</b>	561011730			0.00	0.00	0.00	57,110.74	57,110.74 USD	No	
2	14443	No	Aerovías de México, S.A. de C.V.	BANCO BILBAO VIZCAYA ARGENTARIA SA ATTN ANA TORRES; SHIRIN ARABSOLGHAR CIUDAD BBVA, ED. OCEANIA, PLANTA 2ª CALLE AZUL 4 MADRID 28050, SPAIN	0.00	0.00	0.00	26,004,519.99	26,004,519.99 USD	Yes	Claim was reduced to reflect actual amount outstanding as of the petition date, principal plus interest through 6/30/2020.
	<b>Date Filed:</b>	1/20/2021									
	<b>Reduced Claim:</b>	14443			0.00	0.00	0.00	25,719,330.13	25,719,330.13 USD	Yes	
3	14447	No	Aerolitoral, S.A. de C.V.	BANCO BILBAO VIZCAYA ARGENTARIA SA ATTN ANA TORRES; SHIRIN ARABSOLGHAR CIUDAD BBVA, ED. OCEANIA, PLANTA 2ª CALLE AZUL 4 MADRID 28050, SPAIN	0.00	0.00	0.00	26,004,519.99	26,004,519.99 USD	Yes	Claim was reduced to reflect actual amount outstanding as of the petition date, principal plus interest through 6/30/2020.
	<b>Date Filed:</b>	1/20/2021									
	<b>Reduced Claim:</b>	14447			0.00	0.00	0.00	25,719,330.13	25,719,330.13 USD	Yes	
4	14461	No	Grupo Aeroméxico, S.A.B. de C.V.	BANCO BILBAO VIZCAYA ARGENTARIA SA ATTN ANA TORRES; SHIRIN ARABSOLGHAR CIUDAD BBVA, ED. OCEANIA, PLANTA 2ª CALLE AZUL 4 MADRID 28050, SPAIN	0.00	0.00	0.00	26,004,519.99	26,004,519.99 USD	Yes	Claim was reduce to reflect actual amount outstanding as of the petition date, principal plus interest through 6/30/2020.
	<b>Date Filed:</b>	1/20/2021									
	<b>Reduced Claim:</b>	14461			0.00	0.00	0.00	25,719,330.13	25,719,330.13 USD	Yes	
5	561018280	No	Aerovías de México, S.A. de C.V.	BANQUETES AMBROSIA SAPI DE CV AV PERIFERICO SUR NO 3395 RINCON DEL PEDREGAL DISTRITO FEDERAL, DISTRITO FEDERAL 99999 MX	0.00	0.00	0.00	57,086.51	57,086.51 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b>	8/25/2020									
	<b>Reduced Claim:</b>	561018280			0.00	0.00	0.00	43,073.93	43,073.93 USD	No	

## Reduced Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
6	561018380	No	Aerovías de México, S.A. de C.V.	BARRAZA ZAMORA ROBERTO AV SIMON BOLIVAR 192 MANZANA 118 LOTE 3 CASA B LAS AMERICAS ECATEPEC DE MORELOS, MEXICO 55070 MX	0.00	0.00	0.00	35,143.54	35,143.54 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b> 8/25/2020										
	<b>Reduced Claim:</b> 561018380				0.00	0.00	0.00	16,983.63	16,983.63 USD	No	
7	14567	No	Aerovías de México, S.A. de C.V.	BBVA BANCOMER SA ATTN ALEJANDRO JOSE CARDENAS BORTONI AV PASEO DE LA REFORMA 510 PISO 45 COL JUAREZ CIUDAD DE MÉXICO 06600, MEXICO	0.00	0.00	0.00	8,404,997.70	8,404,997.70 USD	Yes	Claim was reduced to reflect actual amount outstanding as of the petition date, principal plus interest through 6/30/2020.
	<b>Date Filed:</b> 1/20/2021										
	<b>Reduced Claim:</b> 14567				0.00	0.00	0.00	7,842,317.35	7,842,317.35 USD	Yes	
8	14476	No	Aerovías de México, S.A. de C.V.	COMPAGNIE D'EXPLOITATION DES SERVICES AUXILIAIRES AERIENS C/O GATEGROUP; ATTN ERIK MUELLE 5200 BLUE LAGOON DR, STE 710 MIAMI, FL 33126	0.00	0.00	0.00	174,079.29	174,079.29 USD	No	Reduced by paid post-petition invoice
	<b>Date Filed:</b> 1/20/2021										
	<b>Reduced Claim:</b> 14476				0.00	0.00	0.00	128,758.07	128,758.07 USD	No	
9	14251	No	Aerovías de México, S.A. de C.V.	FORMIA AIRLINE SUPPLIES LIMITED ATTN ROLAND GROHMANN, CEO SUITE 601-2 CHARM CENTRE 700 CASTLE PEAK RD LAI CHI KOK, KOWLOON HONG KONG	0.00	0.00	0.00	2,982,895.95	2,982,895.95 USD	No	Claim was reduced to reflect actual amount outstanding as of the petition date per Debtors' books and records
	<b>Date Filed:</b> 1/20/2021										
	<b>Reduced Claim:</b> 14251				0.00	0.00	0.00	232,417.85	232,417.85 USD	No	
10	561047250	No	Aerovías de México, S.A. de C.V.	GUZAM ALUMINIO SA DE CV MONTECRISTO 32 CERRO DEL JUDIO MAGDALENA CONTRERAS, CDMX 10310 MX	0.00	0.00	0.00	12,794.92	12,794.92 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b> 8/25/2020										
	<b>Reduced Claim:</b> 561047250				0.00	0.00	0.00	6,397.49	6,397.49 USD	No	



**Reduced Claims**

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated	Reason
11	10661	No	Aerovías de México, S.A. de C.V.	IBM CAPITAL MEXICO I S DE RL DE CV ATTN JOSE RAMON ASTUDILLO GARCIA ALFONSO NAPOLES GANDARA 3111 COL. PEÑA BLANCA SANTA FE MEXICO CITY 01210, MEXICO	0.00	0.00	0.00	6,296,506.23	6,296,506.23 USD	No	Claim included operating leases which have been assumed and cure payments made for any owed pre-petition amounts. Adjusted amount reflects outstanding principal and accrued interests through 6/30/2020.
	<b>Date Filed:</b>	12/30/2020									
	<b>Reduced Claim:</b>	10661			0.00	0.00	0.00	4,370,812.34	4,370,812.34 USD	No	
12	561067040	No	Aerovías de México, S.A. de C.V.	MASA MADRE SA DE CV DR GARCIA DIEGO B 209 DOCTORES CUAUHTEMOC, CDMX 6720 MX	0.00	0.00	0.00	61,000.37	61,000.37 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b>	8/25/2020									
	<b>Reduced Claim:</b>	561067040			0.00	0.00	0.00	36,600.31	36,600.31 USD	No	
13	561074990	No	Aerovías de México, S.A. de C.V.	NEORIS DE MEXICO SA DE CV AV HIDALGO 274 PTE CENTRO MONTERREY, NUEVO LEON 64000 MX	0.00	0.00	0.00	40,490.66	40,490.66 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b>	8/25/2020									
	<b>Reduced Claim:</b>	561074990			0.00	0.00	0.00	28,343.51	28,343.51 USD	No	
14	14655	No	Aerovías de México, S.A. de C.V.	SKY CHEFS DE MEXICO SA DE CV ATTN DON E HINDERLITER II 5040 RIVERSIDE DR, BLDG 1, STE 200 IRVING, TX 75039	0.00	0.00	0.00	368,978.02	368,978.02 USD	No	Claim was reduced by payments made pursuant to critical vendor agreement and reflects current outstanding pre-petition liability
	<b>Date Filed:</b>	1/20/2021									
	<b>Reduced Claim:</b>	14655			0.00	0.00	0.00	275,499.83	275,499.83 USD	No	
<b>Reduced Claims Total</b>			<b>Count:</b>	<b>USD</b>	<b>14</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>96,561,568.01</b>	<b>96,561,568.01</b>	

**Exhibit 2 to Objection**

**Sánchez Declaration**

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

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., et al.,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**DECLARATION OF RICARDO JAVIER SÁNCHEZ BAKER IN SUPPORT OF THE  
DEBTORS' TWENTY-SIXTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF  
CLAIM (INSUFFICIENT DOCUMENTATION, WRONG DEBTOR, INCORRECTLY  
CLASSIFIED, NO LIABILITY, SATISFIED, DUPLICATE, AND REDUCED CLAIMS)**

I, Ricardo Javier Sánchez Baker, hereby declare that the following is true to the best of my knowledge, information and belief:

**Background**

1. I am the Chief Financial Officer of Grupo Aeroméxico, S.A.B. de C.V. (“**Grupo Aeroméxico**”), and its affiliates that are debtors and debtors in possession in these proceedings (collectively, the “**Debtors**,” the Debtors collectively with their direct and indirect non-Debtor subsidiaries, the “**Company**”). I have held several other positions at the Company since 2006, including serving as advisor to the Chief Executive Officer and Director of Revenue Management. I have been the chairman of the board of directors of the SABRE Corporation, a member of the SEAT Technical Committee, and a member of the Aeromexpress, CECAM, and PLM boards of directors. I have held various positions within the Federal Public Administration (*Administración Pública Federal*), including deputy director general of public debt for the Ministry of Finance and Public Credit in 2003 and 2005. I hold a bachelor’s degree in economics from the Universidad

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<sup>1</sup> 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.

Iberoamericana, a diploma in finance from Instituto Tecnológico Autónomo de México, and master's and doctorate degrees in economics from the University of California, Los Angeles. I am familiar with the day-to-day operations, business, and financial affairs of the Debtors.

2. I submitted the *Declaration of Ricardo Javier Sánchez Baker in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* [ECF No. 20] (the “**Sánchez First Day Declaration**”). I make this declaration (the “**Declaration**”) in support of the *Debtors' Twenty-Sixth Omnibus Claims Objection to Proofs of Claim (Insufficient Documentation, Wrong Debtor, Incorrectly Classified, No Liability, Satisfied, Duplicate, and Reduced Claims)* (the “**Objection**”). I have reviewed the Objection or have otherwise had its contents explained to me, and the Objection is, to the best of my knowledge, accurate.

3. Except as otherwise indicated, all facts set forth in the Objection and this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, or my opinion based upon experience, knowledge, and information concerning the operations of the Debtors and the aviation industry as a whole. If I were called upon to testify, I could and would testify to each of the facts set forth herein.

4. I am generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and Books and Records<sup>2</sup> that reflect, among other things, the Debtors' liabilities, and the amount thereof owed to their creditors as of the Petition Date. I have read the Objection and corresponding Proposed Order, each filed contemporaneously herewith.

5. To the best of my knowledge, information, and belief, the assertions made in the Objection are accurate. In evaluating the Claims, the Debtors and other reviewing parties have reviewed the Debtors' Books and Records, the relevant Proofs of Claim, as well as the supporting

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

documentation provided by the claimants, and determined that the: (i) Insufficient Documentation Claims; (ii) Wrong Debtor Claims; (iii) Incorrectly Classified Claims; (iv) No Liability Claims; (v) Satisfied Claims; (vi) Duplicate Claims; and/or (viii) Reduced Claims should be disallowed, expunged, modified, reduced, reclassified, or otherwise treated as set forth in the Objection and Proposed Order, and I concur with this determination.

### **Misclassified Unliquidated Claims**

6. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Insufficient Documentation Claim, the Debtors have determined that the Insufficient Documentation Claims fail to provide sufficient documentation to establish their validity, and are not supported by or consistent with the Debtors' Books and Records. Moreover, in an effort to avoid filing an objection, nearly two months ago, the Debtors notified the Insufficient Documentation Claimants that their Claims were deficient and unverifiable, and requested that the Insufficient Documentation Claimants provide further information and/or documentation, a request which was not acknowledged.

7. If the Insufficient Documentation Claims identified on Schedule 1 are not disallowed and expunged, the Insufficient Documentation Claimants may improperly receive recoveries on account of the Insufficient Documentation Claims at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Insufficient Documentation Claims as set forth therein and in the Objection

### **Wrong Debtor Claims**

8. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Wrong Debtor Claim, the Debtors have determined that each Wrong Debtor Claim has been filed against an incorrect Debtor. If the Wrong

Debtor Claims are not modified, the claimants identified on Schedule 2 may improperly receive recoveries on a Claim against the incorrect Debtor. Accordingly, I believe it is proper for the Court to enter the Proposed Order modifying the Wrong Debtor Claims as set forth therein and in the Objection.

**Incorrectly Classified Claims**

9. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Incorrectly Classified Claim, the Debtors have determined that the claimant for each of these Claims is, in part or in full, not entitled to the asserted status or other priority identified in the Claim. If the Incorrectly Classified Claims are not properly reclassified, the claimants identified on Schedule 3 may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order reclassifying the Incorrectly Classified Claims as set forth therein and in the Objection.

**No Liability Claims**

10. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each No Liability Claim, the Debtors have determined that such Claims seek to recover amounts for which the Debtors are not liable. If the No Liability Claims are not disallowed and expunged, the claimants identified on Schedule 4 may improperly receive recoveries on account of the Claim at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the No Liability Claims as set forth therein and in the Objection.

**Satisfied Claims**

11. To the best of my knowledge, information, and belief, based on the Debtors' review

of the Claims Register, the Books and Records, and each Satisfied Claim, the Debtors have determined that the Satisfied Claims have been paid and/or otherwise satisfied. If the Satisfied Claims are not disallowed and expunged, the claimants identified on Schedule 5 may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Satisfied Claims as set forth therein and in the Objection.

### **Duplicate Claims**

12. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Duplicate Claim, the Debtors have determined that the Duplicate Claims set forth on Schedule 6 are duplicative of other Claims filed by or on behalf of the same claimant relating to the same purported liability.

13. Furthermore, for each Duplicate Claim, the Debtors have identified a Surviving Claim that asserts the same liability and is identified on Schedule 6 in the applicable row labeled "Surviving Claim."

14. If the Duplicate Claims identified on Schedule 6 are not disallowed, the claimants identified therein may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Duplicate Claims as set forth therein and in the Objection.

### **Reduced Claims**

15. To the best of my knowledge, information, and belief, based on the Debtors' review of the Claims Register, the Books and Records, and each Reduced Claim, the Debtors have determined that each Reduced Claim (i) seeks to recover amounts in excess of what is reflected on the Debtors' Books and Records and/or (ii) was filed with insufficient documentation to support the

asserted Claim amount. If the Reduced Claims are not reduced and/or modified as set forth on Schedule 7, the claimants identified therein may obtain recoveries in excess of what they are entitled at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order reducing and/or modifying the Reduced Claims as set forth therein and in the Objection.

### **Conclusion**

16. I am authorized to submit this Declaration on behalf of the Debtors. In my opinion, and for the reasons set forth in this Declaration and in the Objection, (a) modifying, reducing, and/or reclassifying the Wrong Debtor, Incorrectly Classified, and Reduced Claims and (b) disallowing and/or expunging the Insufficient Documentation, No Liability, Satisfied, and Duplicate Claims, is in the best interest of the Debtors' estates.

17. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed: November 17, 2021

By: /s/ Ricardo Javier Sánchez Baker  
Ricardo Javier Sánchez Baker  
Chief Financial Officer



**Exhibit B**

**Omnibus Claims Hearing Procedures**

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

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., *et al.*,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**COURT-ORDERED OMNIBUS CLAIMS HEARING PROCEDURES**

The Omnibus Claims Hearing Procedures (the “**Omnibus Claims Hearing Procedures**”) described herein have been ordered by the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) to apply to the chapter 11 cases of Grupo Aeroméxico, S.A.B. de C.V. and its affiliated debtors.

**Omnibus Claims Hearing Procedures**

1. Pursuant to the Order Establishing Certain Notice, Case Management, and Administrative Procedures, entered on July 8, 2020 [ECF No. 79] (the “**Case Management Order**”), the Court established periodic omnibus hearings (the “**Omnibus Hearings**”) in these cases. The Debtors shall schedule the return date for claims objections, omnibus or otherwise, for hearing at Omnibus Hearings or other hearings the Debtors may schedule with the Court.

2. The Court may enter an order at the scheduled hearing sustaining an objection to proofs of claim (each, a “**Proof of Claim**”) with respect to which no response (a “**Response**”) <sup>2</sup> is

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<sup>1</sup> The Debtors in these cases, along with the last four digits of 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.

<sup>2</sup> Any information submitted in connection with a Proof of Claim shall be part of the record with respect to the relevant Claim, and any such information already submitted need not be resubmitted in connection with the Omnibus Claims Hearing Procedures.

properly filed and served or pursuant to a certificate of no objection in accordance with the Case Management Order.

3. The hearing to consider an objection to Proofs of Claim as to which a Response is properly filed and served (each, a “**Contested Claim**”) shall be set for a contested hearing (each, an “**Omnibus Claims Hearing**”) to be scheduled by the Debtors, in their discretion, as set forth herein.

4. The Debtors shall schedule an Omnibus Claims Hearing for a Contested Claim as follows:

- A. For a non-evidentiary hearing to address whether the Contested Claim has failed to state a claim against the Debtors that can be allowed and should be dismissed pursuant to Bankruptcy Rule 7012 (a “**Sufficiency Hearing**”), unless the Debtors serve the claimant with a Notice of Merits Hearing (as defined herein), the Sufficiency Hearing shall go forward at the return date set in accordance with paragraph 1 of these Omnibus Claims Hearing Procedures. The legal standard of review that will be applied by the Court at a Sufficiency Hearing will be equivalent to the standard applied by the Court upon a motion to dismiss for failure to state a claim upon which relief can be granted.
- B. For an evidentiary hearing on the merits of a Contested Claim (a “**Merits Hearing**”), the Debtors may, in their discretion, serve upon the relevant claimant, by email or overnight delivery, with a copy to the Official Committee of Unsecured Creditors, Apollo Management Holdings, L.P., and the Ad Hoc Group of Senior Noteholders,<sup>3</sup> and file with the Court, a notice substantially in the form attached to the Claims Objections Procedures Order as **Exhibit 2** (a “**Notice of Merits Hearing**”) at least thirty (30) calendar days prior to the date of such Merits Hearing. The rules and procedures applicable to such Merits Hearing will be set forth in a scheduling order issued by the Court in connection therewith.

5. Discovery with respect to a Contested Claim will not be permitted until either (a) the Court has held a Sufficiency Hearing and determined that the Contested Claim states a claim that could be allowed and should not be dismissed pursuant to Bankruptcy Rule 7012 or (b) the Debtors have served on the relevant claimant a Notice of Merits Hearing with respect to the Contested Claim.

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<sup>3</sup> As identified in the *Third Amended Verified Statement of the Ad Hoc Group of Senior Noteholders Pursuant to Bankruptcy Rule 2019* [ECF No. 1731].

6. The Debtors may file and serve a reply (a “**Reply**”) to a Response no later than 4:00 p.m., prevailing Eastern Time, on the day that is two (2) calendar days prior to the date of the applicable hearing (which may fall on a Saturday, Sunday, or legal holiday notwithstanding Bankruptcy Rule 9006 or equivalent provisions).

7. The Debtors, in their discretion, are authorized to adjourn a hearing scheduled in accordance herewith at any time by providing notice to the Court and the claimants.