

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' TWENTY-SEVENTH 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 EXHIBIT(S) AND SCHEDULE 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, RICHARD J. STEINBERG (richard.steinberg@davispolk.com or +1-646-460-1954), OR MOSHE MELCER (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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**NOTICE OF HEARING ON DEBTORS' TWENTY-SEVENTH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (NO LIABILITY CLAIMS)**

PLEASE TAKE NOTICE that, on December 6, 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-Seventh Omnibus Claims Objection to Proofs of Claim (No Liability Claims)* (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

The Objection is annexed hereto as **Exhibit A**. The Objection requests that the Bankruptcy

¹ 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.

Court disallow and expunge one or more of your Claims² listed on Schedule 1 to Exhibit 1 of the Objection annexed hereto on the grounds that such Claims seek to recover amounts for which the Debtors are not liable (the “**No Liability 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.

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 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 and expungement of a Proof of Claim without further notice to a claimant.

If you do NOT oppose the disallowance and expungement of your Claim(s) listed on Schedule 1 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 and expungement of your Claim(s) listed on Schedule 1 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 **January 6, 2022 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

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

for the amount of the Claim; (iii) a concise statement setting forth the reasons why the Claim should not be disallowed and expunged 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 (iii) 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 **January 12, 2022 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 Schedule 1 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 objection.

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). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.³

³ 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>.

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.**

Dated: December 6, 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 A

Objection

DAVIS POLK & WARDWELL LLP
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

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

In re:

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

Debtors.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**DEBTORS' TWENTY-SEVENTH OMNIBUS CLAIMS OBJECTION
TO PROOFS OF CLAIM (NO LIABILITY CLAIMS)**

* * *

TO THE CLAIMANTS LISTED ON SCHEDULE 1 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 SCHEDULE 1 TO THE PROPOSED ORDER. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 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-*

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

Seventh Omnibus Claims Objection to Proofs of Claim (No Liability 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-Seventh Omnibus Claims Objection to Proofs of Claim (No Liability 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 and expunging each of the claims identified on Schedule 1 to the Proposed Order (the “**No Liability Claims**”), as set forth therein.²

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 *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

² Schedule 1 to the Proposed Order is incorporated herein by reference.

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. The Debtors have also filed an additional omnibus claims objection, which is currently pending the Court’s approval. *See* ECF No. 2157.

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, including claims that “are inconsistent with the Debtors’ books and records.” 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. The Debtors object to the Claims listed on Schedule 1 to the Proposed Order (“**Schedule 1**”) 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.

23. 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 1 in the column labeled “Reason.”

24. 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.

Separate Contested Matters

25. 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 and expungement herein shall be deemed a separate order with respect to each Claim.

Response to Omnibus Objections

26. 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.

27. 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;
- 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.

28. 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 and expunging their Claim(s), without further notice or a hearing.

Reservation of Rights

29. 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 Schedule 1. Unless the No Liability Claims are disallowed and expunged, the Debtors reserve their right (i) to object to the No Liability Claims on any other grounds that the Debtors discover or elect to pursue and/or (ii) to assert substantive and/or one or more additional non-substantive objections at a later time.

30. Notwithstanding anything contained in this Objection or the exhibits or schedules attached hereto, 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

31. 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 Schedule 1; (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

32. 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: December 6, 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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**ORDER GRANTING DEBTORS' TWENTY-SEVENTH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (NO LIABILITY CLAIMS)**

Upon the objection (the “**Objection**”)² of the above-captioned Debtors, pursuant to sections 105 and 502 of the Bankruptcy Code and Bankruptcy Rule 3007, seeking to disallow and expunge the Claims identified on **Schedule 1** 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 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

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

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

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 No Liability Claims identified on **Schedule 1** annexed hereto are hereby disallowed and expunged in their entirety.
3. This Order shall be deemed a separate Order with respect to each No Liability Claim identified on **Schedule 1** 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.
4. 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.
5. 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.

6. 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: _____, 2022
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

No Liability Claims

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	20453	Aerovías de México, S.A. de C.V.	AEROVIAJES PACIFICO DE BOGOTA SA CARRERA 13 NO. 77A-80 AV. EL DORADO NO. 68C-61 LOCAL 109 BOGOTA 110221 COLOMBIA	0.00	0.00	0.00	2,835.06	2,835.06 USD	No
	Date Filed:	1/15/2021							
2	13303	Aerovías de México, S.A. de C.V.	AGENCE EDEN TOUR 20219430 EDEN TOUR 20219430 4 PLACE MAURICE MARCHAIS VANNES 56000 FRANCE	0.00	0.00	0.00	3,131.82	3,131.82 USD	No
	Date Filed:	1/13/2021							
3	20463	Aerovías de México, S.A. de C.V.	AGENCIA DE VIAJES GUAMA CALLE TENERIFE, 20 LAS PALMAS GRAN CANARIA 35008 SPAIN	0.00	0.00	0.00	725.00	725.00 USD	No
	Date Filed:	1/15/2021							
4	14866	Aerovías de México, S.A. de C.V.	AILLEURS VOYAGES OVP PRIVAS GNBSR2101 5 COURS ST LOUIS PRIVAS 07000 FRANCE	0.00	0.00	0.00	1,330.00	1,330.00 USD	No
	Date Filed:	5/26/2021							
5	14867	Aerovías de México, S.A. de C.V.	AILLEURS VOYAGES OVP PRIVAS GNBSR2101 5 COURS ST LOUIS PRIVAS 07000 FRANCE	0.00	0.00	0.00	1,330.00	1,330.00 USD	No
	Date Filed:	5/26/2021							
6	13821	Aerovías de México, S.A. de C.V.	AILLEURS VOYAGES/OVP MARIETTON- 20245352 14 RUE DE L'HOTEL DIEU PONTOISE 95300 FRANCE	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/14/2021							
7	13608	Aerovías de México, S.A. de C.V.	AIRPLUS CO LTD 2-15-15 SHIMBASHI MINATO-KU TOKYO 105-0004 JAPAN	0.00	0.00	0.00	23,547.00	23,547.00 USD	No
	Date Filed:	1/14/2021							
8	13699	Aerovías de México, S.A. de C.V.	ALFAINTER TRAVEL INC EXCEL BLDG 7F 1-20-10, NISHI-SHIMBASHI MINATO-KU TOKYO 105-0003 JAPAN	0.00	0.00	0.00	14,549.00	14,549.00 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
9	13715	Aerovías de México, S.A. de C.V.	ALFAINTER TRAVEL INC EXCEL BLDG 7F 1-20-10, NISHI-SHIMBASHI MINATO-KU TOKYO 105-0003 JAPAN	0.00	0.00	0.00	104,665.00	104,665.00 USD	No
	Date Filed:	1/14/2021							
10	12187	Aerovías de México, S.A. de C.V.	AMERICAN EXPRESS GLOBAL BUSINESS TRAVEL 5 CHURCHILL PLACE CANARY WHARF LONDON E14 5HU UNITED KINGDOM	0.00	0.00	0.00	2,353.00	2,353.00 USD	No
	Date Filed:	1/8/2021							
11	13701	Aerovías de México, S.A. de C.V.	AMERICAN EXPRESS INT'L INC 4-1-1, TORANOMON MINATO-KU TOKYO 105-6920 JAPAN	0.00	0.00	0.00	13,752.00	13,752.00 USD	No
	Date Filed:	1/14/2021							
12	14345	Aerovías de México, S.A. de C.V.	AMEX GLOBAL BUSINESS TRAVEL NTA 4-3-8 TAIHEI SUMIDA-KU TOKYO 1300012 JAPAN	0.00	0.00	0.00	8,000.00	8,000.00 USD	No
	Date Filed:	1/15/2021							
13	11123	Aerovías de México, S.A. de C.V.	ARKAS TURIZM SEYAHAT ACENTASI AS ARKAS MIST KONAKRAL OFIS KULE ANKARA ASFALTI CADDESI CINARLIO MAHALLESİ / KONAK IZMIR 35170 TURKEY	0.00	847.00	0.00	0.00	847.00 USD	No
	Date Filed:	12/30/2020							
14	20307	Aerovías de México, S.A. de C.V.	ATLANTA AGENCIA DE VIAJES SAU CALVET 55 BARCELONA 08021 SPAIN	0.00	0.00	0.00	720.00	720.00 USD	No
	Date Filed:	1/14/2021							
15	20420	Aerovías de México, S.A. de C.V.	AVORIS RETAIL DIVISION SL AV 16 DE JULIO, 75 PALMA DE MALLORCA 07009 SPAIN	0.00	0.00	0.00	25,108.72	25,108.72 USD	Yes
	Date Filed:	1/15/2021							
16	20422	Aerovías de México, S.A. de C.V.	AVORIS RETAIL DIVISION SL AV 16 DE JULIO, 75 PALMA DE MALLORCA 07009 SPAIN	0.00	0.00	0.00	150,745.99	150,745.99 USD	Yes
	Date Filed:	1/15/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
17	14795	Aerovías de México, S.A. de C.V.	BBG VOYAGES CONTOURS 20255970 2 AV MAX GALLO NICE 06300 FRANCE	0.00	0.00	0.00	1,391.57	1,391.57 USD	No
	Date Filed:	3/1/2021							
18	20413	Aerovías de México, S.A. de C.V.	BIVESTOUR AGENCIA DE VIAJES PADRE DON RUA 10 VIGO 36203 SPAIN	0.00	0.00	0.00	222.00	222.00 USD	No
	Date Filed:	1/15/2021							
19	20415	Aerovías de México, S.A. de C.V.	BIVESTOUR AGENCIA DE VIAJES PADRE DON RUA 10 VIGO 36203 SPAIN	0.00	0.00	0.00	1,755.00	1,755.00 USD	No
	Date Filed:	1/15/2021							
20	20219	Aerovías de México, S.A. de C.V.	BIVESTOUR AGENCIA DE VIAJES PADRE DON RUA 10 VIGO 36203 SPAIN	0.00	0.00	0.00	912.00	912.00 USD	No
	Date Filed:	1/11/2021							
21	13113	Aerovías de México, S.A. de C.V.	BRASIL TURISMO CO LTD 2-3-12-1F SHIBA MINATO-KU TOKYO 105-0014 JAPAN	0.00	0.00	0.00	10,805.25	10,805.25 USD	No
	Date Filed:	1/12/2021							
22	10268	Aerovías de México, S.A. de C.V.	BRAVONEXT SA VICOLO DEI CALVI 2 CHIASSO, CH 6830 SWITZERLAND	0.00	0.00	0.00	1,280,738.85	1,280,738.85 USD	No
	Date Filed:	10/7/2020							
23	13784	Aerovías de México, S.A. de C.V.	CAP SOLEIL VOYAGES 20244173 11 COURS MIRABEAU NARBONNE 11100 FRANCE	0.00	0.00	0.00	3,094.14	3,094.14 USD	No
	Date Filed:	1/14/2021							
24	14348	Aerovías de México, S.A. de C.V.	CENTRALE VOYAGES IATA 20255270 29 RUE TRONCHET PARIS 75008 FRANCE	0.00	0.00	0.00	1,506.00	1,506.00 USD	No
	Date Filed:	1/15/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
25	20447	Aerovías de México, S.A. de C.V.	CENTRO DE AGENCIAS CORPORATIVAS SAC AV JOSE PARDO #801 MIRAFLORES, LIMA L18 PERU	0.00	0.00	0.00	5,519.94	5,519.94 USD	No
	Date Filed:	1/15/2021							
26	14771	Aerovías de México, S.A. de C.V.	CHARTER TRAVEL 49 GREENACRES, WOOLTON HILL, NEWBURY NEWBURY RG20 9TA UNITED KINGDOM	0.00	0.00	0.00	1,001.14	1,001.14 USD	No
	Date Filed:	2/5/2021							
27	20363	Aerovías de México, S.A. de C.V.	CHEVERE FLAMENCO SL VIAJES CELEBRES CALLE MARTINEZ MALDONADO 79, LOCAL MALAGA 29007 SPAIN	0.00	0.00	0.00	5,102.34	5,102.34 USD	Yes
	Date Filed:	1/14/2021							
28	14491	Aerovías de México, S.A. de C.V.	CLUB MEDITERRANNEE 20278521 11 RUE DE CAMBRAI PARIS 75019 FRANCE	0.00	0.00	0.00	87,500.00	87,500.00 USD	No
	Date Filed:	1/15/2021							
29	12823	Aerovías de México, S.A. de C.V.	CTRIIP AIR TICKETING JAPAN CO LTD 9F NIPPON BLDG, OTEMACHI, CHIYODA-KU TOKYO 100-0004 JAPAN	0.00	0.00	0.00	6,023.65	6,023.65 USD	No
	Date Filed:	1/11/2021							
30	11655	Aerovías de México, S.A. de C.V.	CTRIIP KOREA CO LTD 7F D TOWER, 17 JONG-RO 3-GIL JONGRO-GU SEOUL 03155 SOUTH KOREA	0.00	0.00	0.00	5,289.74	5,289.74 USD	No
	Date Filed:	1/4/2021							
31	12640	Aerovías de México, S.A. de C.V.	CTRIIP KOREA CO LTD 7F D TOWER, 17 JONG-RO 3-GIL JONGRO-GU SEOUL 03155 SOUTH KOREA	0.00	0.00	0.00	20,733.00	20,733.00 USD	Yes
	Date Filed:	1/11/2021							
32	20373	Aerovías de México, S.A. de C.V.	DEPINGA TRAVEL SLU CARRER CAL GERRER 2, 6-3 RUBI 08191 SPAIN	0.00	0.00	0.00	2,264.62	2,264.62 USD	Yes
	Date Filed:	1/14/2021							
33	13992	Aerovías de México, S.A. de C.V.	DIVERSITY TRAVEL MANCHESTER ONE - 15 FLOOR 53 PORTLAND STREET MANCHESTER M1 3LD UNITED KINGDOM	0.00	0.00	0.00	173.01	173.01 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
34	14396	Aerovías de México, S.A. de C.V.	DNATA TRAVEL HOLDINGS UK LIMITED LANCASTER HOUSE CENTURION WAY LEYLAND PR26 6TX UNITED KINGDOM	0.00	0.00	0.00	152,517.00	152,517.00 USD	No
	Date Filed:	1/15/2021							
35	11676	Aerovías de México, S.A. de C.V.	DONGWON TRAVEL AGENCY 299, SAMIL-DAERO, JUNG-GU SEOUL 04537 SOUTH KOREA	0.00	0.00	0.00	2,552.00	2,552.00 USD	No
	Date Filed:	1/5/2021							
36	14926	Grupo Aeroméxico, S.A.B. de C.V.	EVASION 2000 SARL ROUTE DE NANCY GONDREVILLE 54840 FRANCE	0.00	0.00	0.00	1,813.62	1,813.62 EUR	Yes
	Date Filed:	9/28/2021							
37	13988	Aerovías de México, S.A. de C.V.	FELLOWSHIP TRAVEL INTERNATIONAL INC 10220 TIMBER RIDGE DR ASHLAND VA 23005	0.00	0.00	0.00	9,091.75	9,091.75 USD	No
	Date Filed:	1/14/2021							
38	14918	Aerovías de México, S.A. de C.V.	FLEX INTERNATIONAL CO LTD AD TAKADANOBABA BLD, 4F 3-35-2, TAKADANOBABA, SHINJUKU-KU TOKYO 169-0075 JAPAN	0.00	0.00	0.00	5,526.44	5,526.44 USD	Yes
	Date Filed:	8/24/2021							
39	14470	Aerovías de México, S.A. de C.V.	FLYTOUR AGENCIA DE VIAGENS E TURISMO AVENIDA JURUA 641 BARUERI, SP 06455010 BRAZIL	0.00	0.00	0.00	129,273.95	129,273.95 USD	No
	Date Filed:	1/15/2021							
40	14464	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	89,355.69	89,355.69 USD	No
	Date Filed:	1/15/2021							
41	14478	Aerovías de México, S.A. de C.V.	FRAM 13 RUE DEVILLE TOULOUSE 31000 FRANCE	0.00	0.00	0.00	12,779.86	12,779.86 USD	No
	Date Filed:	1/15/2021							
42	14473	Aerovías de México, S.A. de C.V.	FTI TICKETSHOP GMBH LANDSBERGERSTRASSE 88 MÜNCHEN 80339 GERMANY	0.00	0.00	0.00	37,700.96	37,700.96 USD	No
	Date Filed:	1/15/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
43	14025	Aerovías de México, S.A. de C.V.	GATE 1 TRAVEL 455 MARYLAND DR FORT WASHINGTON PA 19034	0.00	0.00	0.00	18,888.55	18,888.55 USD	No
	Date Filed:	1/14/2021							
44	14712	Aerovías de México, S.A. de C.V.	GEO VOYAGES - SELECTOUR - 20258125 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,548.90	1,548.90 USD	No
	Date Filed:	1/19/2021							
45	14713	Aerovías de México, S.A. de C.V.	GEO VOYAGES - SELECTOUR - 20258125 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,548.90	1,548.90 USD	No
	Date Filed:	1/19/2021							
46	14714	Aerovías de México, S.A. de C.V.	GEO VOYAGES - SELECTOUR - 20258125 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,548.90	1,548.90 USD	No
	Date Filed:	1/19/2021							
47	14715	Aerovías de México, S.A. de C.V.	GEO VOYAGES - SELECTOUR - 20258125 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,548.90	1,548.90 USD	No
	Date Filed:	1/19/2021							
48	14716	Aerovías de México, S.A. de C.V.	GEO VOYAGES - SELECTOUR - 20258125 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,548.90	1,548.90 USD	No
	Date Filed:	1/19/2021							
49	14719	Aerovías de México, S.A. de C.V.	GEO VOYAGES 2025812-5 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,157.15	1,157.15 USD	No
	Date Filed:	1/19/2021							
50	14717	Aerovías de México, S.A. de C.V.	GEO VOYAGES 2025812-5 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	4,471.38	4,471.38 USD	No
	Date Filed:	1/19/2021							
51	14718	Aerovías de México, S.A. de C.V.	GEO VOYAGES 2025812-5 4-6 RUE DE NOISY BRY SUR MARNE 94360 FRANCE	0.00	0.00	0.00	1,184.41	1,184.41 USD	No
	Date Filed:	1/19/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
52	14787	Aerovías de México, S.A. de C.V.	GLOBALIA BUSINESS TRAVEL CARR DE LLUCMAJOR KM 21.5 S/N LLUCMAJOR ES 07620 SPAIN	0.00	0.00	0.00	148.37	148.37 USD	No
	Date Filed:	2/23/2021							
53	14806	Aerovías de México, S.A. de C.V.	GLOBALIA BUSINESS TRAVEL CARR DE LLUCMAJOR KM 21.5 S/N LLUCMAJOR ES 07620 SPAIN	0.00	0.00	0.00	580.70	580.70 USD	No
	Date Filed:	3/8/2021							
54	246	Aerovías de México, S.A. de C.V.	GREEN ALLIGATOR TRAVEL & EVENTS AG KASTAUDEN 4A SWITZERLAND ROMANSHORN 8590 SWITZERLAND	0.00	0.00	0.00	2,683.94	2,683.94 USD	No
	Date Filed:	1/7/2021							
55	13295	Aerovías de México, S.A. de C.V.	GZMEIYA ECOMMERCE INT'L TRAVEL AGENCY CO 13-14 FLOOR, NO.520 GZ NORTH AVENUE SINYINK. 520 INFORMATION PORT TIANHE DISTRICT GUANGZHOU 510000 CHINA	0.00	0.00	0.00	109,516.85	109,516.85 USD	Yes
	Date Filed:	1/13/2021							
56	13307	Aerovías de México, S.A. de C.V.	GZMEIYA ECOMMERCE INT'L TRAVEL AGENCY CO 13-14 FLOOR, NO.520 GZ NORTH AVENUE SINYINK. 520 INFORMATION PORT TIANHE DISTRICT GUANGZHOU 510000 CHINA	0.00	0.00	0.00	2,953.54	2,953.54 USD	No
	Date Filed:	1/13/2021							
57	12887	Aerovías de México, S.A. de C.V.	HANKYU HANSHIN BUSINESS TRAVEL CO LTD 3F SHIBAURA RENASITE TOWER 3-9-1, SHIBAURA, MINATO-KU TOKYO 108-0023 JAPAN	0.00	0.00	0.00	43,294.00	43,294.00 USD	No
	Date Filed:	1/12/2021							
58	12889	Aerovías de México, S.A. de C.V.	HANKYU HANSHIN BUSINESS TRAVEL CO LTD 3F SHIBAURA RENASITE TOWER 3-9-1, SHIBAURA, MINATO-KU TOKYO 108-0023 JAPAN	0.00	0.00	0.00	2,536.00	2,536.00 USD	No
	Date Filed:	1/12/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
59	13003	Aerovías de México, S.A. de C.V.	HAVAS VOYAGES BEAUVAIS 20203750 21 RUE SAINT PIERRE BEAUVAIS, 60000 FRANCE	0.00	0.00	0.00	8,581.00	8,581.00 USD	No
	Date Filed:	1/12/2021							
60	13812	Aerovías de México, S.A. de C.V.	HAVAS VOYAGES CASSETTE IATA 20241056 1 RUE CASSETTE PARIS 75006 FRANCE	0.00	0.00	0.00	6,138.00	6,138.00 USD	No
	Date Filed:	1/14/2021							
61	13691	Aerovías de México, S.A. de C.V.	HENGDA TRAVEL SERVICE YUZHONG DISTRICT CHONGQING CITY 4000010 CHINA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	Date Filed:	1/14/2021							
62	12826	Aerovías de México, S.A. de C.V.	HONDA KAIHATSU CO LTD 5-39 HONCHO WAKO-SHI SAITAMA 351-0114 JAPAN	0.00	0.00	0.00	7,472.00	7,472.00 USD	No
	Date Filed:	1/11/2021							
63	14367	Aerovías de México, S.A. de C.V.	HTB-BCD TRAVEL LIMITED HATCHOBORI CENTER BUILDING 9F 4-6-1, HATCHOBORI,CHUO^KU TOKYO 104-0032 JAPAN	0.00	0.00	0.00	3,736.80	3,736.80 USD	No
	Date Filed:	1/15/2021							
64	13556	Aerovías de México, S.A. de C.V.	IHCSA ASSOC NN BLDG 3F, 1-21-17 TORANOMON MINATO-KU TOKYO 105-0001 JAPAN	0.00	0.00	0.00	27,281.94	27,281.94 USD	No
	Date Filed:	1/13/2021							
65	13533	Aerovías de México, S.A. de C.V.	ISLA JAPAN TRAVEL CO LTD 1-10-10-406, NAMBANAKA, NANIWAKU OSAKA 5560011 JAPAN	0.00	0.00	0.00	2,338.92	2,338.92 USD	No
	Date Filed:	1/13/2021							
66	13768	Aerovías de México, S.A. de C.V.	IXION TRAVEL AVDA MANOTERAS, 38 B-309 28050 MADRID MA 28050 SPAIN	0.00	0.00	0.00	1,004.48	1,004.48 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
67	14374	Aerovías de México, S.A. de C.V.	J WORLD TRAVEL CO LTD NH AOYAMA BLD 8F, 3-2-5 KITA-AOYAMA, MINATO-KU TOKYO 1070061 JAPAN	0.00	0.00	0.00	2,885.00	2,885.00 USD	No
	Date Filed:	1/15/2021							
68	13244	Aerovías de México, S.A. de C.V.	JACQUES COEUR VOYAGES 20222403 58 RUE DES ARENES BOURGES 18000 FRANCE	0.00	0.00	0.00	992.77	992.77 USD	No
	Date Filed:	1/13/2021							
69	673	Aerovías de México, S.A. de C.V.	JADE TRAVEL LTD UNIT 101 50 W WILMOT ST RICHMOND HILL ON L4B 1M5 CANADA	0.00	0.00	0.00	3,129.68	3,129.68 USD	No
	Date Filed:	1/21/2021							
70	13223	Aerovías de México, S.A. de C.V.	JFE LIFE CORPORATION 2-3, UCHISAIWAI-SHO 2CHOME CHIYODA-KU TOKYO 1000011 JAPAN	0.00	0.00	0.00	61,255.54	61,255.54 USD	No
	Date Filed:	1/13/2021							
71	10609	Grupo Aeroméxico, S.A.B. de C.V.	JIGU MAEUL TRAVERL CO LTD NAMUNRO 5 ANDONG-SI 36699 SOUTH KOREA	0.00	0.00	0.00	1,580.00	1,580.00 USD	No
	Date Filed:	12/22/2020							
72	13669	Aerovías de México, S.A. de C.V.	JTB BUSINESS TRAVEL SOLUTIONS INC 5-6-52, TOYOSU KOTO-KU TOKYO 1350061 JAPAN	0.00	0.00	0.00	80,601.99	80,601.99 USD	No
	Date Filed:	1/14/2021							
73	13671	Aerovías de México, S.A. de C.V.	JTB BUSINESS TRAVEL SOLUTIONS INC 5-6-52, TOYOSU KOTO-KU TOKYO 1350061 JAPAN	0.00	0.00	0.00	19,687.03	19,687.03 USD	No
	Date Filed:	1/14/2021							
74	14245	Aerovías de México, S.A. de C.V.	JTB CORP 2-3-11, HIGASHI-SHINAGAWA, SHINAGAWA-KU, TOKYO 140-8602 JAPAN	0.00	0.00	0.00	168,595.80	168,595.80 USD	No
	Date Filed:	1/14/2021							
75	14285	Aerovías de México, S.A. de C.V.	K LINE TRAVEL LTD 19-7, NIHOMBASHI KOAMICHO CHUO-KU, TOKYO 103-0016 JAPAN	0.00	0.00	0.00	16,097.02	16,097.02 USD	No
	Date Filed:	1/15/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
76	14485	Aerovías de México, S.A. de C.V.	KARAVEL 17 RUE DE L ECHIQUIER PARIS 75010 FRANCE	0.00	0.00	0.00	26,788.65	26,788.65 USD	No
	Date Filed:	1/15/2021							
77	14629	Aerovías de México, S.A. de C.V.	KILROY INTERNATIONAL A/S NYTORV 5 COPENHAGEN 1460 DENMARK	0.00	0.00	0.00	136,840.06	136,840.06 USD	No
	Date Filed:	1/15/2021							
78	11888	Aerovías de México, S.A. de C.V.	KOKUSAIKOGYO CO LTD TRAVEL SERVICE DEPT 2-10-3, YAESU, CHUO-KU TOKYO 1048460 JAPAN	0.00	0.00	0.00	1,048.00	1,048.00 USD	No
	Date Filed:	1/6/2021							
79	13214	Aerovías de México, S.A. de C.V.	LABEL TOUR 7 RUE ANATOLE FRANCE LEVALLOIS PERRET 92300 FRANCE	0.00	0.00	0.00	167,394.00	167,394.00 USD	No
	Date Filed:	1/13/2021							
80	14773	Aerovías de México, S.A. de C.V.	LINA VOYAGES - 20234244 C/O SELECTOUR 39 AVENUE PAUL VAILLANT COUTURIER VITRY SUR SEINE 94400 FRANCE	0.00	0.00	0.00	2,709.66	2,709.66 USD	No
	Date Filed:	2/10/2021							
81	13918	Aerovías de México, S.A. de C.V.	LINEA VOYAGES 20214375 12 RUE GODOT DE MAUROY PARIS FR 75009 FRANCE	0.00	0.00	0.00	3,029.64	3,029.64 USD	No
	Date Filed:	1/14/2021							
82	13108	Aerovías de México, S.A. de C.V.	LION TRAVEL SERVICE CO LTD HUANGYUAN STREET, HUANGSHI ROAD, BAIYUN GUANGZHOU 510080 CHINA	0.00	0.00	0.00	164.21	164.21 USD	No
	Date Filed:	1/12/2021							
83	13109	Aerovías de México, S.A. de C.V.	LION TRAVEL SERVICE CO LTD HUANGYUAN STREET, HUANGSHI ROAD, BAIYUN GUANGZHOU 510080 CHINA	0.00	0.00	0.00	553.60	553.60 USD	No
	Date Filed:	1/12/2021							
84	13110	Aerovías de México, S.A. de C.V.	LION TRAVEL SERVICE CO LTD ***NO ADDRESS PROVIDED*** GUANDONG, GUANGZHOU 510440 CHINA	0.00	0.00	0.00	594.82	594.82 USD	Yes
	Date Filed:	1/12/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
85	13232	Aerovías de México, S.A. de C.V.	LION TRAVEL SERVICE CO LTD 2, HUANGYUAN FIRST STREET, HUANGSHI ROAD BAIYUN DISTRICT, GUANGZHOU GUANGZHOU 510410 CHINA	0.00	0.00	0.00	223.00	223.00 USD	No
	Date Filed:	1/13/2021							
86	14153	Aerovías de México, S.A. de C.V.	LION TRAVEL SERVICE CO LTD 2, HUANGYUAN FIRST STREET, HUANGSHI ROAD BAIYUN DISTRICT, GUANGZHOU GUANGZHOU 510410 CHINA	0.00	0.00	0.00	539.00	539.00 USD	No
	Date Filed:	1/14/2021							
87	11657	Aerovías de México, S.A. de C.V.	LLC AVIA CENTER YEKATERINBURG SUSHCHEVSKAYA STREET 27, BUILDING 1 MOSCOW 127055 RUSSIA	0.00	0.00	0.00	10,210.58	10,210.58 USD	No
	Date Filed:	1/4/2021							
88	11702	Aerovías de México, S.A. de C.V.	NANKAI TRAVEL INTERNATIONAL CO INC 5-15-1 GINZA CHUO-KU TOKYO 104-0061 JAPAN	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/5/2021							
89	11703	Aerovías de México, S.A. de C.V.	NANKAI TRAVEL INTERNATIONAL CO INC 5-15-1 GINZA CHUO-KU TOKYO 104-0061 JAPAN	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/5/2021							
90	11704	Aerovías de México, S.A. de C.V.	NANKAI TRAVEL INTERNATIONAL CO INC 5-15-1 GINZA CHUO-KU TOKYO 104-0061 JAPAN	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/5/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
91	14863	Aerovías de México, S.A. de C.V.	NIPPON EXPRESS CO LTD 3F 5-4-10, NAKATSU KITA-KU ATTN: TOSHIYUKI SHIMA DEPT OSAKA OVERSEAS ROMOVAL BRANCH OSAKA 531-0071 JAPAN	0.00	0.00	0.00	7,616.00	7,616.00 USD	No
	Date Filed:	5/14/2021							
92	13154	Aerovías de México, S.A. de C.V.	NIPPON SKI RESORT DEVELOPMENT CO LTD 3F JINGUMAE BUILDING 2-17-6 TOKYO SHIBUYA 150-0001 JAPAN	0.00	0.00	0.00	7,263.00	7,263.00 USD	No
	Date Filed:	1/13/2021							
93	13680	Aerovías de México, S.A. de C.V.	NIPPON TRAVEL AGENCY CO LTD ST BLDG. 8F 1-2-4 SHIBAKOEN MINATOKU TOKYO 105-0011 JAPAN	0.00	0.00	0.00	24,157.00	24,157.00 USD	No
	Date Filed:	1/14/2021							
94	14344	Aerovías de México, S.A. de C.V.	NIPPON TRAVEL AGENCY CO LTD RIVERSIDE SUMIDA CENTRAL TOWER 6F 1-19-9 TSUTSUMIDORI SUMIDA-KU TOKYO 131-8565 JAPAN	0.00	0.00	0.00	11,384.00	11,384.00 USD	No
	Date Filed:	1/15/2021							
95	13193	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	3,778.19	3,778.19 USD	No
	Date Filed:	1/13/2021							
96	13196	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	1,465.15	1,465.15 USD	No
	Date Filed:	1/13/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
97	14789	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	3,778.19	3,778.19 USD	No
	Date Filed:	2/24/2021							
98	14790	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	3,778.19	3,778.19 USD	No
	Date Filed:	2/24/2021							
99	13194	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	91.22	91.22 USD	No
	Date Filed:	1/13/2021							
100	13195	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	136.59	136.59 USD	No
	Date Filed:	1/13/2021							
101	13198	Aerovías de México, S.A. de C.V.	NISHITETSU TRAVEL CO LTD JFA HOUSE BLDG 5F 10-15, HONGO 3-CHOME, BUNKYO-KU TOKYO 113-0033 JAPAN	0.00	0.00	0.00	1,465.15	1,465.15 USD	No
	Date Filed:	1/13/2021							
102	14135	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	4,818.20	4,818.20 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
103	14142	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	3,116.90	3,116.90 USD	No
	Date Filed:	1/14/2021							
104	13624	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	1,399.50	1,399.50 USD	No
	Date Filed:	1/14/2021							
105	13628	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	1,399.50	1,399.50 USD	No
	Date Filed:	1/14/2021							
106	13635	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	422.80	422.80 USD	No
	Date Filed:	1/14/2021							
107	13638	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	437.80	437.80 USD	No
	Date Filed:	1/14/2021							
108	13643	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	427.70	427.70 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
109	13644	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	422.80	422.80 USD	No
	Date Filed:	1/14/2021							
110	13646	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	437.80	437.80 USD	No
	Date Filed:	1/14/2021							
111	13650	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	427.70	427.70 USD	No
	Date Filed:	1/14/2021							
112	13660	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	151.00	151.00 USD	No
	Date Filed:	1/14/2021							
113	13665	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	146.80	146.80 USD	No
	Date Filed:	1/14/2021							
114	13670	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	151.00	151.00 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
115	13672	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	140.80	140.80 USD	No
	Date Filed:	1/14/2021							
116	13702	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	422.80	422.80 USD	No
	Date Filed:	1/14/2021							
117	13706	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	437.80	437.80 USD	No
	Date Filed:	1/14/2021							
118	13712	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	427.70	427.70 USD	No
	Date Filed:	1/14/2021							
119	13719	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	422.80	422.80 USD	No
	Date Filed:	1/14/2021							
120	13723	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	437.80	437.80 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
121	13732	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	427.70	427.70 USD	No
	Date Filed:	1/14/2021							
122	13739	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	167.70	167.70 USD	No
	Date Filed:	1/14/2021							
123	13795	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	985.90	985.90 USD	No
	Date Filed:	1/14/2021							
124	13803	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	985.90	985.90 USD	No
	Date Filed:	1/14/2021							
125	13808	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	1,430.00	1,430.00 USD	No
	Date Filed:	1/14/2021							
126	13814	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	308.30	308.30 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
127	13819	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	301.10	301.10 USD	No
	Date Filed:	1/14/2021							
128	13830	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	308.30	308.30 USD	No
	Date Filed:	1/14/2021							
129	13833	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	301.10	301.10 USD	No
	Date Filed:	1/14/2021							
130	13842	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	414.50	414.50 USD	No
	Date Filed:	1/14/2021							
131	13845	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES CO LTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	414.50	414.50 USD	No
	Date Filed:	1/14/2021							
132	13606	Aerovías de México, S.A. de C.V.	NISSIN TRAVEL SERVICE CO LTD 1-32-2, HONCHO, NAKANO-KU TOKYO 164-0012 JAPAN	0.00	0.00	0.00	37,058.00	37,058.00 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
133	13612	Aerovías de México, S.A. de C.V.	NISSIN TRAVEL SERVICE CO LTD 1-32-2, HONCHO, NAKANO-KU TOKYO 164-0012 JAPAN	0.00	0.00	0.00	22,100.00	22,100.00 USD	No
	Date Filed:	1/14/2021							
134	13615	Aerovías de México, S.A. de C.V.	NISSIN TRAVEL SERVICE CO LTD 1-32-2, HONCHO, NAKANO-KU TOKYO 164-0012 JAPAN	0.00	0.00	0.00	25,496.23	25,496.23 USD	No
	Date Filed:	1/14/2021							
135	13619	Aerovías de México, S.A. de C.V.	NISSIN TRAVEL SERVICE CO LTD 1-32-2, HONCHO, NAKANO-KU TOKYO 164-0012 JAPAN	0.00	0.00	0.00	1,589.37	1,589.37 USD	No
	Date Filed:	1/14/2021							
136	13995	Aerovías de México, S.A. de C.V.	OUEST CONTACT TRAVEL AGENCY 7 QUAI MARECHAL JOFFRE LANNION 22300 FRANCE	0.00	0.00	0.00	4,389.44	4,389.44 USD	No
	Date Filed:	1/14/2021							
137	20495	Aerovías de México, S.A. de C.V.	PANORAMA SERVICES AND TRAVEL 10510 W FLAGLER ST MIAMI FL 33174	0.00	0.00	0.00	945.45	945.45 USD	Yes
	Date Filed:	1/21/2021							
138	14755	Aerovías de México, S.A. de C.V.	PLUS VOYAGES C/O AGENCE PLUS VOYAGES 135 BOULEVARD HAUSSMANN PARIS 75008 FRANCE	0.00	0.00	0.00	11,005.00	11,005.00 USD	No
	Date Filed:	1/29/2021							
139	14387	Aerovías de México, S.A. de C.V.	PRO SKY AG SCHANZENSTRASSE 6-20 COLOGNE 51063 GERMANY	0.00	0.00	0.00	3,366.00	3,366.00 USD	Yes
	Date Filed:	1/15/2021							
140	670	Aerovías de México, S.A. de C.V.	RSH TRAVEL INC ATTN ADELINE PIEKHAM-HSIEH 7100 WOODBINE AVE, STE 408 MARKHAM ON L3R 5J2 CANADA	0.00	0.00	0.00	34,350.00	34,350.00 USD	No
	Date Filed:	1/20/2021							
141	11838	Aerovías de México, S.A. de C.V.	SEJOONG CO LTD 143, CHANGGYEONGGUNG-RO, JONGNO-GU SEOUL 03136 SOUTH KOREA	0.00	0.00	0.00	6,012.00	6,012.00 USD	No
	Date Filed:	1/5/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
142	12055	Aerovías de México, S.A. de C.V.	SELECTOUR BLEU VOYAGES IATA 20224945 10 TER BD GAMBETTA GRENOBLE 38000 FRANCE	0.00	0.00	0.00	1,924.00	1,924.00 USD	No
	Date Filed:	1/7/2021							
143	12998	Aerovías de México, S.A. de C.V.	SELECTOUR GARROUSTE VOYAGES IATA 20258055 10 RUE THIERS BAYONNE, 64100 FRANCE	0.00	0.00	0.00	1,040.00	1,040.00 USD	No
	Date Filed:	1/12/2021							
144	10348	Aerovías de México, S.A. de C.V.	SELECTOUR RICHARD FLECHON VOYAGES 111-113 RUE ERNEST DEPROGE FORT DE FRANCE, 97200 MARTINIQUE	0.00	0.00	0.00	2,720.00	2,720.00 USD	No
	Date Filed:	12/10/2020							
145	13948	Aerovías de México, S.A. de C.V.	SELECTOUR VOYAGES MORVAN IATA 20208963 2 PLACE DU POIDS DU ROI SAINT MALO FR 35400 FRANCE	0.00	0.00	0.00	736.65	736.65 USD	No
	Date Filed:	1/14/2021							
146	14763	Aerovías de México, S.A. de C.V.	SELECTOUR VOYAGES SERVICE 77 C/O SELECTOUR VOYAGES SERV 77 20237081 11 RUE DES VIEUX MOULINS LAGNY SUR MARNE 77400 FRANCE	0.00	0.00	0.00	1,512.00	1,512.00 USD	No
	Date Filed:	2/2/2021							
147	14359	Aerovías de México, S.A. de C.V.	SELLAMI, LAETTIA 25, RUE DE PONTTHIEU, BAT. C - RDC PARIS 75008 FRANCE	0.00	0.00	0.00	230,569.94	230,569.94 USD	No
	Date Filed:	1/15/2021							
148	12134	Aerovías de México, S.A. de C.V.	SHANGHAI HUACHENG SOUTHWEST BLDG B,999 JINZHONG ROAD SHANGHAI 200335 CHINA	0.00	0.00	0.00	30,542.84	30,542.84 USD	No
	Date Filed:	1/8/2021							
149	14895	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	1,679.58	1,679.58 USD	Yes
	Date Filed:	8/15/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
150	14896	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	987.00	987.00 USD	No
	Date Filed:	8/16/2021							
151	14897	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
152	14898	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
153	14899	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
154	14900	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
155	14901	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
156	14902	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
157	14903	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
158	14904	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
159	14905	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
160	14906	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							
161	14907	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	8/16/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
162	14908	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	1,679.58	1,679.58 USD	Yes
	Date Filed:	8/16/2021							
163	14909	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	302.00	302.00 USD	Yes
	Date Filed:	8/16/2021							
164	14910	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	880.00	880.00 USD	No
	Date Filed:	8/16/2021							
165	14911	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	759.00	759.00 USD	No
	Date Filed:	8/16/2021							
166	14912	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	987.00	987.00 USD	No
	Date Filed:	8/16/2021							
167	14913	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	987.00	987.00 USD	No
	Date Filed:	8/16/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
168	14894	Aerovías de México, S.A. de C.V.	SHANGHAI PINGWEN AIR SERVICE CO LTD ROOM 1803, LONG BUSINESS CENTER NO.941, JIAOZHOU ROAD, SHANGHAI, CHINA SHANGHAI 200060 CHINA	0.00	0.00	0.00	987.00	987.00 USD	Yes
	Date Filed:	8/15/2021							
169	14872	Aerovías de México, S.A. de C.V.	SHARP TRAVEL SERVICE (PHILS) INC 5F ALEXANDER HOUSE BLDG. 132 AMORSOLO ST. LEGASPI VILLAGE MAKATI 1229 PHILIPPINES	0.00	0.00	0.00	61,075.40	61,075.40 USD	No
	Date Filed:	5/31/2021							
170	10324	Aerovías de México, S.A. de C.V.	SIGNAL TOURS LTD SOKOLOVE 33 RAMAT HASHARON 47236 ISRAEL	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	12/9/2020							
171	20155	Aerovías de México, S.A. de C.V.	SILK TRAVEL SLU CARDENUELA RIOPICO 9 F - 6°C MADRID, 28050 SPAIN	0.00	0.00	0.00	1,477.09	1,477.09 USD	No
	Date Filed:	12/30/2020							
172	13599	Aerovías de México, S.A. de C.V.	STA TRAVEL IKEBUKURO DUPLEX B'S 12F 2-40-13 IKEBUKURO TOSHIMA-KU TOKYO 171-0014 JAPAN	0.00	0.00	0.00	1,171.70	1,171.70 USD	No
	Date Filed:	1/13/2021							
173	14440	Aerovías de México, S.A. de C.V.	SUCCESSION VOYAGE 164 RUE DE COURCELLES PARIS 75017 FRANCE	0.00	0.00	0.00	183.14	183.14 USD	Yes
	Date Filed:	1/15/2021							
174	13075	Aerovías de México, S.A. de C.V.	TABIKOBO CO LTD SUNSHINE60 46F, 3-1-1 HIGASHIIKEBUKURO TOSHIMA-KU TOKYO 170-6046 JAPAN	0.00	0.00	0.00	41,929.00	41,929.00 USD	No
	Date Filed:	1/12/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
175	14330	Aerovías de México, S.A. de C.V.	TOPPAN TRAVEL SERVICE CORP AIORI DAINI BLDG., 1-13-2 SAKAE NAKA-KU NAGOYA, AICHI 4600008 JAPAN	0.00	0.00	0.00	4,156.26	4,156.26 USD	No
	Date Filed:	1/15/2021							
176	13461	Aerovías de México, S.A. de C.V.	TOTAL TRAVEL ENTERPRISES 2332 GALIANO ST, STE 124 CORAL GABLES FL 33134	0.00	0.00	0.00	14,889.49	14,889.49 USD	No
	Date Filed:	1/13/2021							
177	13704	Aerovías de México, S.A. de C.V.	TOYOTA TOURIST INTERNATIONAL INC 5TH FL COMO SQUARE WEST, 2- 160 KITA-MACHI TOYOTA-SHI AICHI-KEN 4710027 JAPAN	0.00	0.00	0.00	16,674.00	16,674.00 USD	No
	Date Filed:	1/14/2021							
178	12912	Aerovías de México, S.A. de C.V.	TRAVEL CONNAISSEURS 1 RUE JEAN FERAUD CAGNES SUR MER 06800 FRANCE	0.00	0.00	0.00	3,101.19	3,101.19 USD	No
	Date Filed:	1/12/2021							
179	14400	Aerovías de México, S.A. de C.V.	TRAVEL COUNSELLORS LTD ATTN ANDY BARLOW VENUS NO.1 OLD PARK LANE MANCHESTER M41 7HA UNITED KINGDOM	0.00	0.00	0.00	32,936.85	32,936.85 USD	No
	Date Filed:	1/15/2021							
180	14317	Aerovías de México, S.A. de C.V.	TRAVEL PLAZA INTERNATIONAL INC HF MONZENNAKACHO BUILDING 5F 2-1-9 TOMIOKA KOTO-KU TOKYO 1358531 JAPAN	0.00	0.00	0.00	61,691.47	61,691.47 USD	No
	Date Filed:	1/15/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
181	14921	Aerovías de México, S.A. de C.V.	TRAVEL STANDARD JAPAN CO LTD 11F, METROPOLITAN PLAZA BLD. 1-11-1, NISHI-IKEBUKURO, TOSHIMA-KU, TOKYO JP 171-0021 JAPAN	0.00	0.00	0.00	84,293.00	84,293.00 USD	No
	Date Filed:	9/6/2021							
182	11659	Aerovías de México, S.A. de C.V.	TRIP COM AUSTRALIA PTY LIMITED LEVEL 20, 20 BOND STREET SYDNEY NSW AU 2000 AUSTRALIA	0.00	0.00	0.00	6,291.45	6,291.45 USD	No
	Date Filed:	1/4/2021							
183	13824	Aerovías de México, S.A. de C.V.	TUI 4U GMBH OTTO-LILIENTHAL-STRASSE 17 BREMEN DE 28199 GERMANY	0.00	0.00	0.00	48,629.68	48,629.68 USD	No
	Date Filed:	1/14/2021							
184	20204	Aerovías de México, S.A. de C.V.	TUNIBRA TRAVEL JAPAN INC 4-13-5 HATCHOBORI SAIWAI BDLG 3F CHUO-KU, TOKYO 104-0032 JAPAN	0.00	0.00	0.00	3,780.00	3,780.00 USD	No
	Date Filed:	1/7/2021							
185	20205	Aerovías de México, S.A. de C.V.	TUNIBRA TRAVEL JAPAN INC 4-13-5 HATCHOBORI SAIWAI BDLG 3F CHUO-KU, TOKYO 104-0032 JAPAN	0.00	0.00	0.00	1,507.00	1,507.00 USD	No
	Date Filed:	1/8/2021							
186	14422	Aerovías de México, S.A. de C.V.	VACACIONES EDREAMS SL ON BEHALF OF PAXS BAILEN 67-69 BARCELONA 08009 SPAIN	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/15/2021							
187	13009	Aerovías de México, S.A. de C.V.	VAUCLUSE VOYAGES 20202501 38 BOULEVARD ALBIN DURAND CARPENTRAS, FR 84200 FRANCE	0.00	0.00	0.00	998.00	998.00 USD	No
	Date Filed:	1/12/2021							
188	13014	Aerovías de México, S.A. de C.V.	VAUCLUSE VOYAGES 20202501 38 BOULEVARD ALBIN DURAND CARPENTRAS, FR 84200 FRANCE	0.00	0.00	0.00	822.00	822.00 USD	No
	Date Filed:	1/12/2021							
189	13016	Aerovías de México, S.A. de C.V.	VAUCLUSE VOYAGES 20202501 38 BOULEVARD ALBIN DURAND CARPENTRAS, FR 84200 FRANCE	0.00	0.00	0.00	822.00	822.00 USD	No
	Date Filed:	1/12/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
190	13020	Aerovías de México, S.A. de C.V.	VAUCLUSE VOYAGES 20202501 38 BOULEVARD ALBIN DURAND CARPENTRAS, FR 84200 FRANCE	0.00	0.00	0.00	112.00	112.00 USD	No
	Date Filed:	1/12/2021							
191	13021	Aerovías de México, S.A. de C.V.	VAUCLUSE VOYAGES 20202501 38 BOULEVARD ALBIN DURAND CARPENTRAS, FR 84200 FRANCE	0.00	0.00	0.00	112.00	112.00 USD	No
	Date Filed:	1/12/2021							
192	11781	Aerovías de México, S.A. de C.V.	VERSAILLES VOYAGES 27 BOULEVARD DES ITALIENS PARIS, 75002 FRANCE	0.00	0.00	0.00	157,335.00	157,335.00 USD	No
	Date Filed:	1/5/2021							
193	20520	Aerovías de México, S.A. de C.V.	VIAJES AMAIA SA DOSCTOR CASTELO 15 - LOCAL MADRID 28009 SPAIN	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	2/18/2021							
194	20408	Aerovías de México, S.A. de C.V.	VIAJES DE AUTOR SL CALLE PRINCIPE DE VERGARA 26 28001 MADRID 28001 SPAIN	0.00	0.00	0.00	15,103.10	15,103.10 USD	No
	Date Filed:	1/15/2021							
195	12975	Aerovías de México, S.A. de C.V.	VOYAGES ROUILLARD 20264473 11 BLD DU GENERAL LECLERC BINIC 22520 FRANCE	0.00	0.00	0.00	1,427.05	1,427.05 USD	No
	Date Filed:	1/12/2021							
196	13631	Aerovías de México, S.A. de C.V.	WESTMINSTER TRAVEL LIMITED HUANGYUAN FIRST STREET, HUANGSHI ROAD, BAIYUN DISTRICT GUANGZHOU 510410 CHINA	0.00	0.00	0.00	468.00	468.00 USD	No
	Date Filed:	1/14/2021							
197	14922	Aerovías de México, S.A. de C.V.	WESTMINSTER TRAVEL LTD UNITS 01-06, 18/F, CDW BUILDING, 388 CASTLE PEAK ROAD, TSUEN WAN, 852 HONG KONG	0.00	0.00	0.00	1,554.00	1,554.00 USD	No
	Date Filed:	9/9/2021							
198	14923	Aerovías de México, S.A. de C.V.	WESTMINSTER TRAVEL LTD UNITS 01-06, 18/F, CDW BUILDING, 388 CASTLE PEAK ROAD, TSUEN WAN, 852 HONG KONG	0.00	0.00	0.00	167.00	167.00 USD	No
	Date Filed:	9/9/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
199	14924	Aerovías de México, S.A. de C.V.	WESTMINSTER TRAVEL LTD UNITS 01-06, 18/F, CDW BUILDING, 388 CASTLE PEAK ROAD, TSUEN WAN, 852 HONG KONG	0.00	0.00	0.00	1,554.00	1,554.00 USD	No
	Date Filed:	9/9/2021							
200	13863	Aerovías de México, S.A. de C.V.	WORLD TRAVEL SYSTEM INC FUTAKO TAMAGAWA RISE OFFICE, 2-21-1 TAMAGAWA SETAGAYA-KU TOKYO 158-0094 JAPAN	0.00	0.00	0.00	35,355.44	35,355.44 USD	Yes
	Date Filed:	1/14/2021							
201	11936	Aerovías de México, S.A. de C.V.	WOW TRAVEL KFT (TRAVEL AGENCY) ORA UT 15B 2 EM 7 BUDAPEST 1125 HUNGARY	0.00	0.00	0.00	2,135.00	2,135.00 USD	No
	Date Filed:	1/6/2021							
202	13798	Aerovías de México, S.A. de C.V.	YUSEN TRAVEL CO LTD HATANO BLDG, 2-2, KANDA- JINBOCHO CHIYODA-KU TOKYO 101-8422 JAPAN	0.00	0.00	0.00	4,749.00	4,749.00 USD	No
	Date Filed:	1/14/2021							
203	13800	Aerovías de México, S.A. de C.V.	YUSEN TRAVEL CO LTD HATANO BLDG, 2-2, KANDA- JINBOCHO CHIYODA-KU TOKYO 101-8422 JAPAN	0.00	0.00	0.00	6,702.00	6,702.00 USD	No
	Date Filed:	1/14/2021							
204	13806	Aerovías de México, S.A. de C.V.	YUSEN TRAVEL CO LTD HATANO BLDG, 2-2, KANDA- JINBOCHO CHIYODA-KU TOKYO 101-8422 JAPAN	0.00	0.00	0.00	4,090.00	4,090.00 USD	No
	Date Filed:	1/14/2021							

No Liability Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
205	13760	Aerovías de México, S.A. de C.V.	YUSEN TRAVEL CO LTD 2-2,KANDA-JINBOCHO CHIYODA-KU TOKYO 101-8422 JAPAN	0.00	0.00	0.00	1,758.00	1,758.00 USD	No
	Date Filed:	1/14/2021							
206	13791	Aerovías de México, S.A. de C.V.	YUSEN TRAVEL CO LTD HATANO BLDG, 2-2, KANDA- JINBOCHO CHIYODA-KU TOKYO 101-8422 JAPAN	0.00	0.00	0.00	2,118.00	2,118.00 USD	No
	Date Filed:	1/14/2021							
207	14305	Aerovías de México, S.A. de C.V.	ZY INTERNATIONAL TRAVELAGENCY (HK) LTD NO.2006, DONGMENSOUTHROAD LUOHU DISTRICT SHENZHEN 518001 CHINA	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/15/2021							
208	14335	Aerovías de México, S.A. de C.V.	ZY INTERNATIONAL TRAVELAGENCY (HK) LTD NO.2006, DONGMENSOUTHROAD LUOHU DISTRICT SHENZHEN 518001 CHINA	0.00	0.00	0.00	0.00	0.00 USD	No
	Date Filed:	1/15/2021							
No Liability Claim Totals				Count: 207	USD	0.00	847.00	0.00	4,326,013.34
				1	EUR	0.00	0.00	0.00	1,813.62

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.¹**

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**DECLARATION OF RICARDO JAVIER SÁNCHEZ BAKER
IN SUPPORT OF THE DEBTORS' TWENTY-SEVENTH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (NO LIABILITY 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

¹ The Debtors in these cases, along with each Debtor’s registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors’ corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

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-Seventh Omnibus Claims Objection to Proofs of Claim (No Liability 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 Records² 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 documentation provided by the claimants, and determined that the No Liability Claims should be

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

disallowed and expunged as set forth in the Objection and Proposed Order, and I concur with this determination.

No Liability 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 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 1 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.

Conclusion

7. 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, disallowing and expunging the No Liability Claims is in the best interest of the Debtors' estates.

8. 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: December 6, 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.¹

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**”)² is

¹ 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.

² 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,³ 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.

³ 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.