

**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)

**TWENTY-FIFTH SUPPLEMENTAL DECLARATION OF DEREK C.
ABBOTT IN SUPPORT OF THE APPLICATION OF DEBTORS
FOR ENTRY OF AN ORDER UNDER 11 U.S.C. § 327(a),
FED. R. BANKR. P. 2014 AND 2016, AND S.D.N.Y. LBR 2014-1
AND 2016-1, AUTHORIZING RETENTION AND EMPLOYMENT OF
MORRIS, NICHOLS, ARSHT & TUNNELL LLP AS BANKRUPTCY CO-
COUNSEL FOR THE DEBTORS *NUNC PRO TUNC* TO JULY 23, 2020**

I, Derek C. Abbott, hereby declare under penalty of perjury:

1. I am a partner at Morris, Nichols, Arsht & Tunnell LLP (“**Morris Nichols**”), which maintains an office for the practice of law at 1201 North Market Street, 16th Floor, Wilmington, Delaware 19801. I am an attorney at law, duly admitted and in good standing to practice in the state of Delaware, as well as in the United States District Court for the District of Delaware.

2. I submit this declaration (this “**Twenty-Fifth Supplemental Declaration**”) to supplement my declaration, dated August 5, 2020 (the “**Initial Declaration**”), attached as Exhibit A to the *Application of Debtors for Entry of an Order Under 11 U.S.C. §§ 327(a), 328(a) and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and S.D.N.Y. LBR 2014-1 and 2016-1, Authorizing Retention and Employment of Morris, Nichols, Arsht & Tunnell LLP as*

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

Bankruptcy Co-Counsel for the Debtors Nunc Pro Tunc to July 23, 2020 [D.I. 240] (the “**Application**”) filed on August 5, 2020.² By order entered on September 22, 2020, the Court approved the Application [D.I. 444]. This Twenty-Fifth Supplemental Declaration does not replace anything set forth in the Application, the Initial Declaration, or any previously submitted declaration except as expressly set forth herein.³

3. Except as otherwise indicated, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently hereto.⁴

4. Morris Nichols conducted, and continues to conduct, research into its relations with the Debtors, their creditors, and other parties in interest in these chapter 11 cases. In connection with this continued research, I am informed that Morris Nichols has been engaged to represent Morgan Stanley and its respective related entities in matters unrelated to these chapter 11 cases.

² Capitalized terms not defined herein are defined in the Application. Morris Nichols does not waive by the Application, this Twenty-Fifth Supplemental Declaration, and its contents, and hereby reserves and preserves all privileges.

³ As of the filing of this Twenty-Fifth Supplemental Declaration, the Debtors have filed twenty-four previous supplemental declarations at docket numbers 438, 504, 526, 582, 587, 614, 711, 733, 744, 751, 836, 892, 929, 944, 961, 1013, 1053, 1088, 1204, 1234, 1250, 1422, 1869 and 2256.

⁴ Certain of the disclosures herein relate to matters within the knowledge of other attorneys at Morris Nichols and are based on information provided by them.

5. Should any additional information relevant to Morris Nichols' retention and employment in the above-captioned cases come to Morris Nichols' attention, Morris Nichols will file additional supplemental declarations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 7, 2021
Wilmington, Delaware

/s/ Derek C. Abbott
Derek C. Abbott