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

In re:)	Chapter 11
GRUPO AEROMÉXICO, S.A.B. de C.V., <i>et al.</i> , ¹)	Case No. 20-11563 (SCC)
Debtors.)	(Jointly Administered)

**DECLARATION OF JUAN MANUEL DELGADO REGARDING
2022 HOURLY RATES OF MORRISON & FOERSTER LLP AS SPECIAL
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

I, Juan Manuel Delgado, being duly sworn, state the following under penalty of perjury:

1. I am a partner in the law firm of Morrison & Foerster LLP (“Morrison & Foerster”), with offices at 600 Brickell Avenue, Suite 1560, Miami, Florida, 33131, among other locations,

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.

and I am duly authorized to make this declaration (the “Declaration”) on behalf of Morrison & Foerster, which serves as special counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Grupo Aeroméxico, S.A.B. de C.V. and its above-captioned affiliates, as debtors and debtors-in-possession (collectively, the “Debtors”). I am an attorney duly admitted and in good standing to practice before the Bars of the State of New York, the State of Florida, and the District of Columbia. There are no disciplinary proceedings pending against me. Except as otherwise indicated, the facts set forth in this Declaration are personally known to me and, if called as a witness, I could and would testify thereto.

2. On August 5, 2020, the Committee filed the *Application for Entry of an Order Authorizing the Retention and Employment of Morrison & Foerster LLP as Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to July 15, 2020* [Docket No. 241] (as amended and supplemented, from time to time, the “Application”). On September 25, 2020, the Court entered the *Order Authorizing the Retention and Employment of Morrison & Foerster LLP as Counsel to the Official Committee of Unsecured Creditors Nunc Pro Tunc to July 15, 2020* [Docket No. 473] (the “Retention Order”).

3. Pursuant to the Retention Order, Morrison & Foerster is required to provide ten business days’ notice of any rate changes to the Debtors and the Office of the United States Trustee for the Southern District of New York (the “United States Trustee”) and file such notice with the Court. The Committee has consented to the increased hourly rates set forth herein.

4. In accordance with the Retention Order, this Declaration shall constitute notice to the Debtors and the United States Trustee that, effective January 1, 2022, Morrison & Foerster’s standard hourly rates for attorneys and paraprofessionals, subject to change from time to time (the “2022 Hourly Rates”), will range as follows:

- a. the hourly rates for partners will range from \$1,125 to \$1,875 per hour;
- b. the hourly rates for “senior of counsel” will range from \$1,150 to \$1,775 per hour;
- c. the hourly rates for “of counsel” will range from \$825 to \$1,500 per hour;
- d. the hourly rates for other attorneys and associates will range from \$655 to \$1,050 per hour; and
- e. the hourly rates for paraprofessionals will range from \$320 to \$540 per hour.

5. As set forth in the Application, Morrison & Foerster’s hourly rates are set at a level designed to fairly compensate Morrison & Foerster for the work of its attorneys and paraprofessionals and to cover certain fixed and routine overhead expenses. Morrison & Foerster’s hourly rates are subject to periodic adjustment to reflect economic and other conditions and are consistent with the rates charged by other firms rendering comparable services.

6. As set forth in the Application and in accordance with section 330(a)(3)(F) of title 11 of the United States Code (the “Bankruptcy Code”), Morrison & Foerster represents that the 2022 Hourly Rates, as set forth herein, are reasonable based on the customary compensation charged by practitioners of comparable seniority, distinction, skill, and expertise in cases other than cases under the Bankruptcy Code, reflect economic and other conditions, and are consistent with rates charged by peer law firms.

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

Dated: December 16, 2021
Miami, Florida

/s/ Juan Manuel Delgado
Juan Manuel Delgado