

**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-SIXTH 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 and the United States Court of Appeals for the Third Circuit.

2. On June 30, 2020 (the “**Petition Date**”), each of the above captioned debtors and debtors in possession (collectively, the “**Debtors**”) commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). On August 5, 2020, the Debtors filed 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,*

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.

and S.D.N.Y. LBR 2014-1 and 2016-1, Authorizing Retention and Employment of Morris, Nichols, Arshat & Tunnell LLP as Bankruptcy Co-Counsel for the Debtors Nunc Pro Tunc to July 23, 2020 [D.I. 240] (the “**Application**”).²

3. My declaration, dated August 5, 2020, in support of the Application (the “**Initial Declaration**”) was attached to the Application as Exhibit A. By order entered on September 22, 2020, the Court approved the Application [D.I. 444] (the “**Retention Order**”).

4. In connection with the Application and Retention Order, I submit this declaration (this “**Twenty-Sixth Supplemental Declaration**”) ³ to provide additional disclosures as required under the Retention Order. This Twenty-Sixth 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.⁴

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

6. In the Initial Declaration, I disclosed Morris Nichols’ hourly rates for work of this nature in effect at that time. I also disclosed that the hourly rates are adjusted from time to time, typically at the beginning of the year. Pursuant to paragraph 4 of the Retention Order, Morris Nichols must file a supplemental affidavit and provide ten business days’ notice of any increases to its billing rates during the Chapter 11 Cases.

² Capitalized terms not defined herein are defined in the Application.

³ Morris Nichols does not waive by the Application, this Twenty-Sixth Supplemental Declaration, and its contents, and hereby reserves and preserves all privileges.

⁴ As of the filing of this Twenty-Sixth Supplemental Declaration, the Debtors have filed twenty-five 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, 2256 and 2269.

7. Morris Nichols' hourly rates that will take effect on January 1, 2022, including for matters related to the Chapter 11 Cases, range as follows:

Partners	\$800–1,500
Associates and Special Counsel	\$485-875
Paraprofessionals	\$295-360
Legal Assistants	\$195

8. Morris Nichols has notified the Debtors of the rate increase disclosed in this Twenty-Sixth Supplemental Declaration and the Debtors have consented to the rate increase.

9. 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 16, 2021
Wilmington, Delaware

/s/ Derek C. Abbott
Derek C. Abbott