

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' THIRTIETH 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(S) 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 MARIYA DEKHTYAR (mariya.dekhtyar@davispolk.com or +1-646-334-4364).

**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' THIRTIETH OMNIBUS CLAIMS OBJECTION
TO PROOFS OF CLAIM (SATISFIED CLAIMS)**

PLEASE TAKE NOTICE that, on December 30, 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 *Thirtieth Omnibus Claims Objection to Proofs of Claim (Satisfied 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 Court disallow and expunge one or more of your Claims² listed on Schedule 1 to Exhibit 1 of the

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

Objection annexed hereto on the grounds that such Claims (a) have been paid or otherwise satisfied by the Debtors after the Petition Date in accordance with the Bankruptcy Code, applicable rules, or an order issued by the Bankruptcy Court or (b) have been satisfied in full by a party that is not a Debtor (collectively, “**Satisfied Claims**”). 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 expungement and disallowance 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 expungement and disallowance 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 31, 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

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), and Richard J. Steinberg (richard.steinberg@davispolk.com)), counsel to the Debtors, and (ii) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019 (Attn: Brett H. Miller (bmiller@willkie.com), Todd M. Goren (tgoren@willkie.com), Craig Damast

(cdamast@willkie.com), and Debra M. Sinclair (dsinclair@willkie.com)), counsel to the Official Committee of Unsecured Creditors appointed in these cases.

Except as otherwise permitted under the Omnibus Claims Hearing Procedures, a hearing (the “**Hearing**”) will be held on **February 4, 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 30, 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
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Marshall S. Huebner
Timothy Graulich
James I. McClammy
Stephen D. Piraino

*Counsel to the Debtors
and Debtors in Possession*

Exhibit A

Objection

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**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' THIRTIETH OMNIBUS CLAIMS OBJECTION
TO PROOFS OF CLAIM (SATISFIED 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 *Thirtieth Omnibus Claims Objection to Proofs of Claim (Satisfied Claims)* (the “**Objection**”), pursuant to the

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.

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 Thirtieth Claims Objection to Proofs of Claim (Satisfied 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 “**Satisfied 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 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.

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

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 26 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, 2358. The Debtors have also filed an additional two omnibus claims objections, which are currently pending the Court’s approval. *See* ECF Nos. 2257, 2268.

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). An omnibus claims objection may be filed if all the claims being objected to fall under one of several listed categories, including, without limitation, claims (i) that "have been satisfied or released during the case in accordance with the [Bankruptcy] Code, applicable rules, or a court order," see Fed. R. Bankr. P. 3007(d)(5), and/or (ii) that have "been satisfied in full by a party that is not a Debtor." Claims Obj. Proc. Order, ¶ 2(a)(vi).

Objection

22. The Debtors object to the Claims listed on Schedule 1 to the Proposed Order (the "**Satisfied Claims**") and request that each Satisfied Claim be disallowed and expunged. Based on a review of the Claims Register and the Satisfied Claims, the Debtors have determined that each Satisfied Claim has been paid or otherwise satisfied by the Debtors after the Petition Date, "in accordance with the Bankruptcy Code, applicable rules, or a court order," see Fed. R. Bankr.

P. 3007(d)(5), including pursuant to the Court's First Day Orders, or (ii) has been satisfied in full by a party that is not a Debtor.

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

Separate Contested Matters

24. Each Satisfied Claim and the Debtors' 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 the requests for disallowance and expungement herein shall be deemed a separate order with respect to each Claim.

Response to Omnibus Objections

25. 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)
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.

26. 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 and expunged 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.

27. 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

28. 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. The Debtors further reserve their right to object to the Satisfied Claims on any other grounds that the Debtors discover or elect to pursue. The Debtors reserve their right to assert substantive and/or one or more additional non-substantive objections to the Claims subject to this Objection at a later time.

29. Notwithstanding anything contained in this Objection or the exhibit or schedule 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

30. 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

31. 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 30, 2021
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

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Marshall S. Huebner
Timothy Graulich
James I. McClammy
Stephen D. Piraino

*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' THIRTIETH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (SATISFIED 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 hearing on the Objection; and the Court having determined that the legal and factual bases set forth

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.

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:

2. The Objection is hereby granted as set forth herein.
3. The Satisfied Claims identified on **Schedule 1** annexed hereto are hereby disallowed and expunged in their entirety.
4. This Order shall be deemed a separate Order with respect to each Satisfied 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.
5. 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.
6. 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.

7. 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

Satisfied Claims

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	10116	No	Aerovías de México, S.A. de C.V.	ABASTO BASICO SA DE CV 1 3 5 Y 7 AV PRINCIPAL AREA DE ABASTO CENTRAL DE ABASTOS IZTAPALAPA CDMX 09040 MEXICO	0.00	17,546.16	0.00	181,348.09	198,894.25 USD	No
	Date Filed:	8/1/2020								
2	10266	No	Aerovías Empresa de Cargo, S.A. de C.V.	ACCELYA MIDDLE EAST FZE F/K/A MERCATOR SOLUTIONS FZE DUBAI SILICON OASIS HEADQUARTERS DUBAI POB 341476 UNITED ARAB EMIRATES	0.00	0.00	0.00	62,366.58	62,366.58 USD	No
	Date Filed:	10/6/2020								
3	20282	No	Aerovías de México, S.A. de C.V.	ADICO CIA LTDA AV COLON E4-105 Y AV 9 DE OCTUBRE EDIFICIO SOLAMAR, PISO 5, OFICINA 501 QUITO 170522 ECUADOR	0.00	0.00	0.00	2,869.50	2,869.50 USD	No
	Date Filed:	1/13/2021								
4	20088	No	Aerovías de México, S.A. de C.V.	ADMINISTRACIONES TURISTICAS REFORMA SA D AVENIDA VASCO DE QUIROGA 3900 TORRE A 21 01 SANTA FE CUAJIMALPA CIUDAD DE MEXICO,CD 05348 MEXICO	0.00	0.00	0.00	19,250.56	19,250.56 USD	No
	Date Filed:	12/9/2020								
5	561014360	No	Aerovías de México, S.A. de C.V.	ASESORES EN DAÑOS DE TRABAJO SA DE CV LAZARO CARDENAS 31 SAN BARTOLO AMEYALCO MAGDALENA CONTRERAS CDMX 10010 MEXICO	0.00	0.00	0.00	45,361.87	45,361.87 USD	No
	Date Filed:	8/25/2020								
6	565009600	No	Aerolitoral, S.A. de C.V.	ASESORES EN DAÑOS DE TRABAJO SA DE CV LAZARO CARDENAS 31 SAN BARTOLO AMEYALCO MAGDALENA CONTRERAS CDMX 10010 MEXICO	0.00	0.00	0.00	14,382.94	14,382.94 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
7	565009840	No	Aerolitoral, S.A. de C.V.	AUTO TRANSPORTISTAS FERNANDO AMILPA SA DE CV BUGAMBILIAS NO 2158 SECCION CAMPI?A LAS QUINTAS CULIACAN SINALOA 80200 MEXICO	0.00	0.00	0.00	3,476.06	3,476.06 USD	No
	Date Filed:	8/25/2020								
8	20194	No	Aerovías de México, S.A. de C.V.	AVASA MANAGEMENT SL CALLE MALLORCA, 221 4-2 BARCELONA 08008 SPAIN	0.00	0.00	0.00	1,527.46	1,527.46 USD	No
	Date Filed:	1/7/2021								
9	20195	No	Aerovías de México, S.A. de C.V.	AVASA MANAGEMENT SL CALLE MALLORCA, 221 4-2 BARCELONA 08008 SPAIN	0.00	0.00	0.00	4,712.84	4,712.84 USD	No
	Date Filed:	1/7/2021								
10	140	No	Aerovías de México, S.A. de C.V.	AVENGER FLIGHT GROUP LLC C/O NELSON MULLINS BROAD & CASSEL ATTN GARY M FREEDMAN, ESQ 2 S BISCAYNE BLVD, 21ST FL MIAMI FL 33131	0.00	0.00	0.00	719,656.70	719,656.70 USD	Yes
	Date Filed:	12/8/2020								
11	139	No	Aerolitoral, S.A. de C.V.	AVENGER FLIGHT GROUP LLC C/O NELSON MULLINS BROAD & CASSEL ATTN GARY M FREEDMAN, ESQ 2 S BISCAYNE BLVD, 21ST FL MIAMI FL 33131	0.00	0.00	0.00	96,085.68	96,085.68 USD	Yes
	Date Filed:	12/8/2020								
12	561019010	No	Aerovías de México, S.A. de C.V.	BICENTEL SA DE CV AV DE LAS PALMAS 215 INT 304 B LOMAS DE CHAPULTEPEC MIGUEL HIDALGO CDMX 11000 MEXICO	0.00	0.00	0.00	24,014.53	24,014.53 USD	No
	Date Filed:	8/25/2020								
13	561019170	No	Aerovías de México, S.A. de C.V.	BLACK TOP & CHECKER CABS 777 PACIFIC STREET VANCOUVER BC V6Z 2R7 CANADA	0.00	0.00	0.00	2,532.83	2,532.83 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
14	666	No	Aerovías de México, S.A. de C.V.	BODEGA DE SARRIA SA S/N FINCA SENORIO DE SARRIA PUENTE LA REINA NAVARRA 31100 SPAIN	0.00	0.00	0.00	28,571.56	28,571.56 USD	No
	Date Filed:	1/19/2021								
15	20387	No	Aerovías de México, S.A. de C.V.	BP SERVIMED SA DE CV BARRANCA DEL MUERTO 520, MEXICO MX 01010 MEXICO	0.00	0.00	0.00	140.93	140.93 USD	No
	Date Filed:	1/14/2021								
16	108	No	Aerovías de México, S.A. de C.V.	C P APARTOTEL MELIA CASTILLA 43 POETA JOAN MARAGALL MADRID SPAIN	0.00	0.00	0.00	100,330.38	100,330.38 USD	No
	Date Filed:	10/16/2020								
17	565010910	No	Aerolitoral, S.A. de C.V.	CABUS TRANSPORTACIONES SA DE CV GUADALUPE VICTORIA 262 CAMPESTRE CIUDAD OBREGON SONORA 85160 MEXICO	0.00	0.00	0.00	3,000.03	3,000.03 USD	No
	Date Filed:	8/25/2020								
18	14530	No	Aerovías de México, S.A. de C.V.	CAE CFT BV ATTN AYMAN IDIBI 8585 CH DE LA COTE-DE LIESSE SAINT LAURENT QC H4T 1G6 CANADA	0.00	0.00	0.00	207,272.00	207,272.00 USD	No
	Date Filed:	1/15/2021								
19	14515	No	Aerolitoral, S.A. de C.V.	CAE INC AYMAN IDILBI 8585 CH DE LA COTE-DE- LIESSE SAINT LAURENT QC H4T 1G6 CANADA	0.00	0.00	0.00	321,982.27	321,982.27 USD	Yes
	Date Filed:	1/15/2021								
20	14520	No	Aerovías de México, S.A. de C.V.	CAE INC AYMAN IDILBI 8585 CH DE LA COTE-DE- LIESSE SAINT LAURENT QC H4T 1G6 CANADA	0.00	0.00	0.00	321,982.27	321,982.27 USD	Yes
	Date Filed:	1/15/2021								
21	20449	No	Aerovías de México, S.A. de C.V.	CAMARA DE COMERCIO PERUANO JAPONESA GREGORIO ESCOBEDO 803 PISO 7 JESUS MARIA LIMA 15076 PERU	0.00	0.00	0.00	1,500.00	1,500.00 USD	No
	Date Filed:	1/15/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
22	10588	No	Aerovías de México, S.A. de C.V.	CAPITAL RELOCATION SERVICES LLC 108 CARPENTER DR STERLING VA 20164	0.00	0.00	0.00	43,172.36	43,172.36 USD	No
Date Filed:	12/21/2020									
23	566002360	No	Aerovías Empresa de Cargo, S.A. de C.V.	CHAMP CARGOSYSTEMS SA 2 RUE EDMOND REUTERDU CONTERN CONTERN L5326 LUXEMBOURG	0.00	0.00	0.00	15,336.71	15,336.71 USD	No
Date Filed:	8/25/2020									
24	11222	No	Aerovías de México, S.A. de C.V.	CISCO CAPITAL MEXICO S DE RL DE CV C/O BIALSON BERGEN & SCHWAB ATTN LAWRENCE SCHWAB/KENNETH LAW 633 MENLO AVE, STE 100 MENLO PARK CA 94025	0.00	72,808.98	0.00	21,250.47	94,059.45 USD	No
Date Filed:	12/31/2020									
25	10010	No	Aerovías de México, S.A. de C.V.	CLARKE INTERNATIONAL SERVICES 359 N OAK ST INGLEWOOD CA 90302	0.00	0.00	0.00	52,912.99	52,912.99 USD	No
Date Filed:	7/15/2020									
26	561025160	No	Aerovías de México, S.A. de C.V.	CLIMAS Y SERVICIOS CLYSER SAS DE CV CIRCUITO DE LOS PAJAROS 237 LOMAS DE LA SOLEDAD TONALA JALISCO 45403 MEXICO	0.00	0.00	0.00	3,384.88	3,384.88 USD	No
Date Filed:	8/25/2020									
27	561025750	No	Aerovías de México, S.A. de C.V.	COMETRA SERVICIOS INTEGRALES SA DE CV CJON DE CUITLAHUAC 160 LORENZO BOTURINI VENUSTIANO CARRANZA CDMX 15820 MEXICO	0.00	0.00	0.00	1,576.09	1,576.09 USD	No
Date Filed:	8/25/2020									
28	565012280	No	Aerolitoral, S.A. de C.V.	COMETRA SERVICIOS INTEGRALES SA DE CV CJON DE CUITLAHUAC 160 LORENZO BOTURINI VENUSTIANO CARRANZA CDMX 15820 MEXICO	0.00	0.00	0.00	490.08	490.08 USD	No
Date Filed:	8/25/2020									

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
29	566003290	No	Aerovías Empresa de Cargo, S.A. de C.V.	COMETRA SERVICIOS INTEGRALES SA DE CV CJON DE CUITLAHUAC 160 LORENZO BOTURINI VENUSTIANO CARRANZA CDMX 15820 MEXICO	0.00	0.00	0.00	5,115.90	5,115.90 USD	No
	Date Filed:	8/25/2020								
30	561025910	No	Aerovías de México, S.A. de C.V.	COMPANIA MEXICANA DE TRASLADO DE VALORES SA DE CV IXNAHUALTONGO 129 LORENZO BOTURINI VENUSTIANO CARRANZA CDMX 15820 MEXICO	0.00	0.00	0.00	1,749.66	1,749.66 USD	No
	Date Filed:	8/25/2020								
31	565012460	No	Aerolitoral, S.A. de C.V.	COMPANIA MEXICANA DE TRASLADO DE VALORES SA DE CV IXNAHUALTONGO 129 LORENZO BOTURINI VENUSTIANO CARRANZA CDMX 15820 MEXICO	0.00	0.00	0.00	524.38	524.38 USD	No
	Date Filed:	8/25/2020								
32	566003330	No	Aerovías Empresa de Cargo, S.A. de C.V.	COMPANIA MEXICANA DE TRASLADO DE VALORES SA DE CV IXNAHUALTONGO 129 LORENZO BOTURINI VENUSTIANO CARRANZA CDMX 15820 MEXICO	0.00	0.00	0.00	6,539.93	6,539.93 USD	No
	Date Filed:	8/25/2020								
33	561028210	No	Aerovías de México, S.A. de C.V.	COOPERATIVA AUTOGESTIONARIA DE SERVICIOS AEROINDUSTRIALES RL 300 CESTE DEL AEROPUERTO INTERNACIONAL JUAN SANTA MARA ALAJUELA ALAJUELA SAN JOSE COLOMBIA	0.00	0.00	0.00	3,190.00	3,190.00 USD	No
	Date Filed:	8/25/2020								
34	561028600	No	Aerovías de México, S.A. de C.V.	CORTES CASTRO GREGORIO HUMBERTO FERNANDO JORGE JIMENEZ CANTU N 5 SAN SEBASTIAN CHALCO MEXICO 56600	0.00	0.00	0.00	6,154.23	6,154.23 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
35	566003470	No	Aerovías Empresa de Cargo, S.A. de C.V.	CORTES CASTRO GREGORIO HUMBERTO FERNANDO JORGE JIMENEZ CANTU N 5 SAN SEBASTIAN CHALCO MEXICO 56600	0.00	0.00	0.00	1,659.92	1,659.92 USD	No
	Date Filed:	8/25/2020								
36	85	No	Aerovías de México, S.A. de C.V.	CSI LEASING MEXICO S DE RL DE CV #1602 FL 10 OFFICE 1002 AV INSURGENTES SUR CDMX 03940 MEXICO	0.00	0.00	0.00	45,013.68	45,013.68 USD	No
	Date Filed:	9/11/2020								
37	10125	No	Aerovías de México, S.A. de C.V.	DISTRIBUIDORA Y COMERCIALIZADORA ROJANO AVE MIGUEL ALEMAN #141 VIADUC COL ALAMOS DEL BENITO JUAREZ CDMX 03400 MEXICO	0.00	0.00	0.00	192,643.98	192,643.98 MXN	No
	Date Filed:	8/4/2020								
38	10126	No	Aerolitoral, S.A. de C.V.	DISTRIBUIDORA Y COMERCIALIZADORA ROJANO AVE MIGUEL ALEMAN #141 VIADUC COL ALAMOS DEL BENITO JUAREZ CDMX 03400 MEXICO	0.00	0.00	0.00	154,668.15	154,668.15 MXN	No
	Date Filed:	8/4/2020								
39	14190	No	Aerovías de México, S.A. de C.V.	DON MADDOCKS BORESCOPE ON VIDEO INC 83 S MOUNTAIN VIEW RD APACHE JUNCTION AZ 85119	0.00	0.00	0.00	18,124.38	18,124.38 USD	No
	Date Filed:	1/14/2021								
40	561034180	No	Aerovías de México, S.A. de C.V.	ELAVON CANADA COMPANY 120 ADELAIDE STREET WEST SUITE 2300 TORONTO ONTARIO M5H1T1 CANADA	0.00	0.00	0.00	1,054.01	1,054.01 USD	No
	Date Filed:	8/25/2020								
41	13931	No	Aerovías de México, S.A. de C.V.	ENTSERV ENTERPRISE SERV MEXICO SDERLDECV C/O ECKERT SEAMANS CHERIN & MELLOTT LLC ATTN CHRISTOPHER L PERKINS, ESQ 919 E MAIN ST, 13TH FL RICHMOND VA 23219	0.00	0.00	0.00	3,011,628.60	3,011,628.60 USD	No
	Date Filed:	1/14/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
42	561036530	No	Aerovías de México, S.A. de C.V.	EQUIPARTES PARA FOOD SERVICE SA DE CV IGNACIO ZARAGOZA 2 SAN LUCAS TEPETLACALCO TLALNEPANTLA DE BAZ MEXICO 54055	0.00	0.00	0.00	7,581.96	7,581.96 USD	No
	Date Filed:	8/25/2020								
43	561036710	No	Aerovías de México, S.A. de C.V.	ESCAPE PERU SAC Mariano Melgar N°259 URB SIMA LA PERLA PROV CONST DEL CALLAO PERU	0.00	0.00	0.00	4,822.52	4,822.52 USD	No
	Date Filed:	8/25/2020								
44	561036760	No	Aerovías de México, S.A. de C.V.	ESPINOZA RAUDA CYNTHIA ARCELIA DE LA VIGA 1011 B 11 MILITAR MARTE IZTACALCO DISTRITO FEDERAL DISTRITO FEDERAL 8830 MEXICO	0.00	0.00	0.00	10,669.28	10,669.28 USD	No
	Date Filed:	8/25/2020								
45	566004250	No	Aerovias Empresa de Cargo, S.A. de C.V.	ESPINOZA RAUDA CYNTHIA ARCELIA DE LA VIGA 1011 B 11 MILITAR MARTE IZTACALCO DISTRITO FEDERAL DISTRITO FEDERAL 8830 MEXICO	0.00	0.00	0.00	5,248.78	5,248.78 USD	No
	Date Filed:	8/25/2020								
46	566004360	No	Aerovias Empresa de Cargo, S.A. de C.V.	FABRICA DE SOLUCIONES RAK SA DE CV BOSQUES DE VIENA 252 BOSQUES DEL LAGO CUAUTITLAN IZCALLI MEXICO 54766	0.00	0.00	0.00	110,171.78	110,171.78 USD	No
	Date Filed:	8/25/2020								
47	10189	No	Aerovías de México, S.A. de C.V.	FRIENDS TOURISTIK MARKETING GMBH & CO KG HOCHSTRASSE 17 FRANKFURT 60313 GERMANY	0.00	0.00	0.00	69,068.64	69,068.64 USD	No
	Date Filed:	8/21/2020								
48	561041910	No	Aerovías de México, S.A. de C.V.	GIRALDO HERRERA SERGIO ANDRES CRA 48 A 43 A 14 INT 203 ANTIOQUIA MEDELLIN COLOMBIA	0.00	0.00	0.00	682.83	682.83 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
49	561042020	No	Aerovías de México, S.A. de C.V.	GLOBAL AVIATION SERVICES INC YYZ ST TORONTO INTL AIRPORT PO BOX 118 TORONTO ONTARIO L9P1A2 CANADA	0.00	0.00	0.00	24,836.75	24,836.75 USD	No
	Date Filed:	8/25/2020								
50	14433	No	Aerovias Empresa de Cargo, S.A. de C.V.	GLOBAL SERVICES HANDLING C/O WORLDWIDE FLIGHT SERVICES INC ATTN BARON T OURSLER, SVP/GEN COUNSEL 1639 W 23RD ST, STE 240 DALLAS TX 75261	0.00	0.00	0.00	369,586.92	369,586.92 USD	No
	Date Filed:	1/15/2021								
51	565015990	No	Aerolitoral, S.A. de C.V.	GORDO VIAJES SA DE CV SIERRA COTOPAXI 321 LOMAS 3A SECC SAN LUIS POTOSI SAN LUIS POTOSI 78216 MEXICO	0.00	0.00	0.00	2,726.20	2,726.20 USD	No
	Date Filed:	8/25/2020								
52	13552	No	Aerovías de México, S.A. de C.V.	GRUPO NAVITUR SA DE CV VERSALLES 16 PISO 2 COL JUAREZ CUAUHTEMOC DF 06600 MEXICO	0.00	0.00	0.00	1,308.55	1,308.55 USD	No
	Date Filed:	1/13/2021								
53	10161	No	Aerovías de México, S.A. de C.V.	GUZMAN, LOBSANG MATA CALLE COLONDRINAS #156 COL PORTAL DEL SUR SALTILLO, COA 25093 MEXICO	0.00	0.00	0.00	590,185.37	590,185.37 MXN	No
	Date Filed:	8/17/2020								
54	20006	No	Aerolitoral, S.A. de C.V.	GUZMAN, LOBSANG MATA CALLE COLONDRINAS #156 COL PORTAL DEL SUR SALTILLO, COA 25093 MEXICO	0.00	0.00	0.00	533,280.00	533,280.00 MXN	No
	Date Filed:	8/17/2020								
55	20027	No	Aerovías de México, S.A. de C.V.	HEINZ MEXICO SA DE CV 7980 INT 3D PERIFERICO SUR SAN PEDRO TLAQUEPAQUE, MX 45601 MEXICO	0.00	0.00	0.00	1,641.73	1,641.73 USD	Yes
	Date Filed:	9/11/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
56	14526	No	Aerovías de México, S.A. de C.V.	HEWLETT-PACKARD OPERATIONS MEXICO S RL PROLOGACION PASEO DE LA REFORMA #700 COL LOMAS DE SANTA FE DEL ALVARO OBREGON CDMX 01210 MEXICO	0.00	0.00	0.00	90,424.21	90,424.21 USD	No
	Date Filed:	1/15/2021								
57	702	No	Aerovías de México, S.A. de C.V.	HOTEL COLON INTERNACIONALCA AV AMAZONAS N19-14 Y AV PATRIA QUITO ECUADOR	0.00	0.00	0.00	10,773.33	10,773.33 USD	No
	Date Filed:	2/8/2021								
58	565016610	No	Aerolitoral, S.A. de C.V.	HOTELERA AZTLAN DE TAMPICO SA DE CV PROL AV HIDALGO ESQ LOMA REAL 5300 FRACC LOMAS DEL CHAIREL TAMPICO TAMAULIPAS 89360 MEXICO	0.00	0.00	0.00	24,508.13	24,508.13 USD	No
	Date Filed:	8/25/2020								
59	10063	No	Aerovías de México, S.A. de C.V.	HOTELES SHERATON S DE RL DE CV PASEO DE LA REFORMA, #325 DEPTO CONTRALORIA CUAHTEMOC MEXICO CITY 06500 MEXICO	0.00	0.00	0.00	1,744.70	1,744.70 USD	No
	Date Filed:	7/27/2020								
60	11617	No	Aerovías de México, S.A. de C.V.	IBN INDUSTRIES MILITARES Y ALTA TECNOLOG BLVD ADOLFO RUIZ CORTINES #3070 COL JARDIENS DEL PEDREGAL ALCALDIA ALVARO OBREGON CDMX 01900 MEXICO	0.00	0.00	0.00	313,221.60	313,221.60 USD	No
	Date Filed:	1/4/2021								
61	10080	No	Aerovías de México, S.A. de C.V.	IMPULSORA HOTELERA Y DE SERVICIOS BAHIA PROLONGACION PASEO DE LA REFORMA 1015 PISO 9 TORRE A SANTA FE CDMX 05348 MEXICO	0.00	0.00	0.00	6,289.15	6,289.15 USD	No
	Date Filed:	7/30/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
62	20150	No	Aerovías Empresa de Cargo, S.A. de C.V.	INCOE TECNOSERVICIOS SA DE CV ATTN ENRIQUE DIAZ DE LEON NUMERO 1288 COLONIA DEL FRESNO GUADALAJARA, JAL 44900 MEXICO	0.00	0.00	0.00	9,400.55	9,400.55 USD	No
Date Filed:	12/28/2020									
63	561056940	No	Aerovías de México, S.A. de C.V.	INDUSTRIAS HABERS SA DE CV ESFUERZO 2A LAZARO CARDENAS NAUCALPAN DE JUAREZ MEXICO 53560	0.00	0.00	0.00	14,359.14	14,359.14 USD	No
Date Filed:	8/25/2020									
64	14730	No	Aerovías de México, S.A. de C.V.	INTEGRADOR DE TI ACTIGLOBAL SA DE CV AV EJERCITO NACIONAL 423 INT 2 GRANADA, MIGUEL HIDALGO CDMX 11520 MEXICO	0.00	0.00	0.00	30,668.08	30,668.08 USD	No
Date Filed:	1/22/2021									
65	561061420	No	Aerovías de México, S.A. de C.V.	JET AIRCRAFT MAINTENANCE INC PO BOX 668965 MIAMI FL 33166 US	0.00	0.00	0.00	47,150.03	47,150.03 USD	No
Date Filed:	8/25/2020									
66	10000	No	Aerovías de México, S.A. de C.V.	JETSETTERS MAINTENANCE SERVICES INC ATTN RICHARD BENOIT AND LINNEA CHOMAY 91 GASTON DUMOULIN BLAINVILLE QC J7C 6B4 CANADA	0.00	0.00	0.00	32,342.47	32,342.47 USD	No
Date Filed:	7/13/2020									
67	561061810	No	Aerovías de México, S.A. de C.V.	JETT PRO LINE MAINTENANCE CORP PO BOX 3190 ONTARIO CA 91761 US	0.00	0.00	0.00	90,953.62	90,953.62 USD	No
Date Filed:	8/25/2020									
68	561062790	No	Aerovías de México, S.A. de C.V.	JUAN JOSE RAUL ALDAPE CASTRO SAN FRANCISCO FIGURACO NO 54 LA CONCEPCION DISTRITO FEDERAL DELCOYOAC?N 4020 MEXICO	0.00	0.00	0.00	22,623.00	22,623.00 USD	No
Date Filed:	8/25/2020									

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
69	565017700	No	Aerolitoral, S.A. de C.V.	JUAN JOSE RAUL ALDAPE CASTRO SAN FRANCISCO FIGURACO NO 54 LA CONCEPCION DISTRITO FEDERAL DELCOYOAC?N 4020 MEXICO	0.00	0.00	0.00	1,284.71	1,284.71 USD	No
	Date Filed:	8/25/2020								
70	20231	No	Aerovías de México, S.A. de C.V.	KORN FERRY MEXICO SC SIERRA NEVADA 130 PLANTA BAJA LOMAS DE CHAPULTEPEC V SECCION DEL MIGUEL HIDALGO CDMX 11000 MEXICO	0.00	0.00	0.00	104,629.70	104,629.70 USD	No
	Date Filed:	1/12/2021								
71	325	No	Aerolitoral, S.A. de C.V.	LIEBHERR AEROSPACE SALINE INC 1465 WOODLAND DRIVE SALINE MI 48176 1259	0.00	663,467.32	0.00	0.00	663,467.32 USD	No
	Date Filed:	1/13/2021								
72	561065720	No	Aerovías de México, S.A. de C.V.	LOS MATOS ENTERTAINMENT S DE RL CB 1 ENZAMELLA ISABELITA SANTO DOMINGO SANTO DOMINGO DOMINICAN REPUBLIC	0.00	0.00	0.00	2,774.11	2,774.11 USD	No
	Date Filed:	8/25/2020								
73	561065830	No	Aerovías de México, S.A. de C.V.	LUCAS CONTRERAS ADRIAN FERNANDO AVE 609 61 SAN JUAN DE ARAGON 3A SECCION GUSTAVO A MADERO CDMX 7970 MEXICO	0.00	0.00	0.00	12,882.87	12,882.87 USD	No
	Date Filed:	8/25/2020								
74	565018220	No	Aerolitoral, S.A. de C.V.	LUCAS CONTRERAS ADRIAN FERNANDO AVE 609 61 SAN JUAN DE ARAGON 3A SECCION GUSTAVO A MADERO CDMX 7970 MEXICO	0.00	0.00	0.00	892.60	892.60 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
75	20035	No	Aerovías de México, S.A. de C.V.	MARCAS NESTLE SA DE CV 301 BLVD MIGUEL DE CERVANTES SAAVEDRA COL GRANADA DELEG MIGUEL HIDALGO CDMX 11520 MEXICO	0.00	0.00	0.00	10,385.21	10,385.21 USD	No
	Date Filed:	9/28/2020								
76	561067630	No	Aerovías de México, S.A. de C.V.	MCL SERVICIOS Y MANTENIMIENTO DE AERONAVES SRL AEROPUERTO INTERNACIONAL DE LAS AMERICAS DR JFPG DEPOSITO 10 LAS AMERICA SANTO DOMINGO DOMINICAN REPUBLIC	0.00	0.00	0.00	6,715.27	6,715.27 USD	No
	Date Filed:	8/25/2020								
77	561067970	No	Aerovías de México, S.A. de C.V.	MENDOZA CASTRO JOSE ALBINO MORELOS 20 PRADOS DE SANTA LUCIA ZAPOCAN JALISCO 45200 MEXICO	0.00	0.00	0.00	1,865.39	1,865.39 USD	No
	Date Filed:	8/25/2020								
78	561068060	No	Aerovías de México, S.A. de C.V.	MERKAFON DE MEXICO SA DE CV AVE CUAUHTEMOC SUR 400 CENTRO MONTERREY NUEVO LEON 64000 MEXICO	0.00	0.00	0.00	1,853,014.87	1,853,014.87 USD	No
	Date Filed:	8/25/2020								
79	566007150	No	Aerovías Empresa de Cargo, S.A. de C.V.	MERKAFON DE MEXICO SA DE CV AVE CUAUHTEMOC SUR 400 CENTRO MONTERREY NUEVO LEON 64000 MEXICO	0.00	0.00	0.00	49,451.50	49,451.50 USD	No
	Date Filed:	8/25/2020								
80	20202	No	Aerovías de México, S.A. de C.V.	MICRONET DE MEXICO SA DE CV PASEO MARIA ELENA #1129 COL AMPLIACION VALLE DEL MIRADOR MONTERREY, NLE 64750 MEXICO	0.00	0.00	0.00	169,920.65	169,920.65 USD	No
	Date Filed:	1/7/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
81	561072610	No	Aerovías de México, S.A. de C.V.	MINA SERVICIOS SAS AEROPUERTO JMC LC 18 A ANTIOQUIA MEDELLIN COLOMBIA	0.00	0.00	0.00	1,763.14	1,763.14 USD	No
	Date Filed:	8/25/2020								
82	11900	No	Aerovías de México, S.A. de C.V.	MOVABLE INC 5 BRYANT PARK 1065 6TH AVE, 9TH FL NEW YORK NY 10018	0.00	0.00	0.00	8,411.18	8,411.18 USD	No
	Date Filed:	1/6/2021								
83	561074840	No	Aerovías de México, S.A. de C.V.	NCR DE MEXICO S DE RL DE CV AV PASEO DE LAS PALMAS 239 701 LOMAS DE CHAPULTEPEC DISTRITO FEDERAL MEXICO 11000	0.00	0.00	0.00	137,996.61	137,996.61 USD	No
	Date Filed:	8/25/2020								
84	561075260	No	Aerovías de México, S.A. de C.V.	NETCONTROLL GROUP SA DE CV MONTECITO 38 PISO 17 OF 23 NAPOLES BENITO JUAREZ CDMX 3810 MEXICO	0.00	0.00	0.00	188,785.68	188,785.68 USD	No
	Date Filed:	8/25/2020								
85	566007870	No	Aerovias Empresa de Cargo, S.A. de C.V.	OLGUIN PAVIA OLIN PEDRO CALLE 13 MZ 105 LT 26 VALLE DE LOS REYES LA PAZ LOS REYES ACAQUILPAN 56430 MEXICO	0.00	0.00	0.00	2,164.32	2,164.32 USD	No
	Date Filed:	8/25/2020								
86	561076790	No	Aerovías de México, S.A. de C.V.	OLVERA SAAVEDRA JOSE RUBEN GUADALUPE AVENIDA CENTRAL N 95 MINAS DE CRISTO ALVARO OBREGON DISTRITO FEDERAL 1419 MEXICO	0.00	0.00	0.00	2,019.63	2,019.63 USD	No
	Date Filed:	8/25/2020								
87	20080	No	Aerolitoral, S.A. de C.V.	OP DE NEGOCIOS INMOBILIARIA AURORA CARRETERA PANAMERICANA KM 11.1 EJIDO PENUELAS AGUASCALIENTES, AGU 20396 MEXICO	0.00	0.00	0.00	573.20	573.20 USD	Yes
	Date Filed:	11/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
88	20079	No	Aerovías de México, S.A. de C.V.	OP DE NEGOCIOS INMOBILIARIA AURORA CARRETERA PANAMERICANA KM 11.1 EJIDO PENUELAS AGUASCALIENTES, AGU 20396 MEXICO	0.00	0.00	0.00	51.56	51.56 USD	No
	Date Filed:	11/25/2020								
89	10086	No	Aerolitoral, S.A. de C.V.	OPERADORA QUEMARQ SA DE CV PROLONGACION PASEO DE LA REFORMA 1015 PISO 9 TORRE A SANTA FE CDMX 05348 MEXICO	0.00	0.00	0.00	12,829.99	12,829.99 MXN	No
	Date Filed:	7/31/2020								
90	26	No	Aerovías de México, S.A. de C.V.	PANTI CHIC SA DE CV ANIL 240 COL GRANJAS MEXICO DEL IZTACALCO CDMX 08400 MEXICO	0.00	0.00	0.00	151,989.00	151,989.00 USD	No
	Date Filed:	7/31/2020								
91	10030	No	Aerovías de México, S.A. de C.V.	PF BIO PLASTIC BAG SA DE CV VIVEROS DE XOCHIMILCO #17 VIVEROS DE LA LOMA TLALNEPANTLA, EDOMEX 54080 MEXICO	0.00	0.00	0.00	132,057.65	132,057.65 USD	No
	Date Filed:	7/20/2020								
92	10035	No	Aerovías Empresa de Cargo, S.A. de C.V.	PF BIO PLASTIC BAG SA DE CV VIVEROS DE XOCHIMILCO #17 VIVEROS DE LA LOMA TLALNEPANTLA, EDOMEX 54080 MEXICO	0.00	4,064.19	0.00	55,030.85	59,095.04 USD	No
	Date Filed:	7/21/2020								
93	14144	No	Aerovías de México, S.A. de C.V.	PRIME CONVENTIONS SA DE CV SANTIAGO A TEPETLAC NO LT3 MZD 3 COL GUADALUPE PROLETARIA GUSTAVO A MADERO CDMX 07670 MEXICO	0.00	0.00	0.00	363.46	363.46 USD	No
	Date Filed:	1/14/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
94	20381	No	Aerovías de México, S.A. de C.V.	PRIME CONVENTIONS SA DE CV SANTIAGO A TEPETLAC NO LT3 MZD 3 COL GUADALUPE PROLETARIA GUSTAVO A MADERO CDMX 07670 MEXICO	0.00	0.00	0.00	6,055.53	6,055.53 USD	No
	Date Filed:	1/14/2021								
95	561083620	No	Aerovías de México, S.A. de C.V.	PROFESIONALES DE LIMPIEZA SA DE CV TOLUCA 45 ROMA SUR CUAUHTEMOC CDMX 6760 MEXICO	0.00	0.00	0.00	122,866.10	122,866.10 USD	No
	Date Filed:	8/25/2020								
96	566008410	No	Aerovías Empresa de Cargo, S.A. de C.V.	PROFESIONALES DE LIMPIEZA SA DE CV TOLUCA 45 ROMA SUR CUAUHTEMOC CDMX 6760 MEXICO	0.00	0.00	0.00	26,448.75	26,448.75 USD	No
	Date Filed:	8/25/2020								
97	565021630	No	Aerolitoral, S.A. de C.V.	PROFESIONALES DE LIMPIEZA SA DE CV TOLUCA 45 ROMA SUR CUAUHTEMOC CDMX 6760 MEXICO	0.00	0.00	0.00	13,003.25	13,003.25 USD	No
	Date Filed:	8/25/2020								
98	561083970	No	Aerovías de México, S.A. de C.V.	PROYECTO DISEÑO Y CONSTRUCCIONES GANA S DE RL DE CV AV PROLONGACION 8 DE JULIO 1275 INT 116 GEOVILLAS LOS OLIVOS SAN PEDRO TLAQUEPAQUE JALISCO 45601 MEXICO	0.00	0.00	0.00	19,910.07	19,910.07 USD	No
	Date Filed:	8/25/2020								
99	20077	No	Aerovías de México, S.A. de C.V.	PROYECTOS PROCAR SAPI DE CV AV ISLA DE TRIS 28 A KM 5 FRACCIONAMIENTO SAN MIGUEL CIUDAD DEL CARMEN, CAM 24157 MEXICO	0.00	0.00	0.00	102.84	102.84 USD	Yes
	Date Filed:	11/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
100	10045	No	Aerovías de México, S.A. de C.V.	PUNTO DE IMAGEN ALRO SA DE CV PUREPECHAS 23 PLANTA ALTA NAUCALPAN DE JUAREZ 53150 MEXICO	0.00	0.00	0.00	1,018,480.00	1,018,480.00 MXN	No
	Date Filed:	7/23/2020								
101	561085510	No	Aerovías de México, S.A. de C.V.	RADIOCOMUNICACIONES SAKDA SA DE CV ORIENTE 166 NO 256 MOCTEZUMA 2DA SECC VENUSTIANO CARRANZA CDMX 15530 MEXICO	0.00	0.00	0.00	85,508.48	85,508.48 USD	No
	Date Filed:	8/25/2020								
102	561087070	No	Aerovías de México, S.A. de C.V.	RIMAC INTERNACIONAL LAS BEGONIAS 475 3ER PISO SAN ISIDRO LIMA LIMA PERU	0.00	0.00	0.00	380.38	380.38 USD	No
	Date Filed:	8/25/2020								
103	14130	No	Aerovías de México, S.A. de C.V.	ROLLS-ROYCE CNTRLs & DATA SRVCS (UK) LTD MOOR LANE DERBY DE248BJ UNITED KINGDOM	0.00	0.00	0.00	40,300.00	40,300.00 USD	Yes
	Date Filed:	1/14/2021								
104	561089050	No	Aerovías de México, S.A. de C.V.	SANTOS LAGUNA SA DE CV TERRITORIO SANTOS MODELO 1 CONJUNTO DE TODOS TORREON COAHUILA DE ZARAGOZA 27014 MEXICO	0.00	0.00	0.00	57,775.54	57,775.54 USD	No
	Date Filed:	8/25/2020								
105	89	No	Aerovías de México, S.A. de C.V.	SCJ SERVICES SA DE CV CALLE 18 100 C MERIDA, YUC 97305 MEXICO	0.00	0.00	0.00	411.36	411.36 USD	No
	Date Filed:	9/28/2020								
106	561090360	No	Aerovías de México, S.A. de C.V.	SERVAIR SA AV GUSTAVO MEJIA RICART No 93 PLAZA PIAINTINI SUITE 1B SEGUNDO NIVEL ENS PIAINTINI SANTO DOMINGO 10127 DOMINICAN REPUBLIC	0.00	0.00	0.00	3,550.57	3,550.57 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
107	11043	No	Aerovías de México, S.A. de C.V.	SERVICIOS INTEGRALES DE INGENIERIA NORTE 3-A NO. 4704, DEFENSORES DE LA REP GUSTAVO A MADERO, CM 07780 MEXICO	0.00	0.00	0.00	1,599,560.42	1,599,560.42 MXN	No
	Date Filed:	12/29/2020								
108	561091000	No	Aerovías de México, S.A. de C.V.	SHANGHAI TAIKOO AIRCRAFT ENGINEERING SERVICES CO LTD 109 N°1 LING HANG ROAD PUDONG INTERNATIONAL AIRPORT PUDONG NEW AREA DISTRICT SHANGHAI SHANGHAI 210207 CHINA	0.00	0.00	0.00	96,307.38	96,307.38 USD	No
	Date Filed:	8/25/2020								
109	561094390	No	Aerovías de México, S.A. de C.V.	SPAFAX AIRLINE NETWORK S PTE LTD 69A BOAT QUAY SINGAPORE SINGAPORE 49857	0.00	0.00	0.00	496,674.24	496,674.24 USD	No
	Date Filed:	8/25/2020								
110	20349	No	Aerovías de México, S.A. de C.V.	STRATEGY & EVENTS MICE SA DE CV PROTASIO TAGLE 104 COL SAN MIGUEL DEL CHATUPELTEC CDMX 11850 MEXICO	0.00	0.00	0.00	690.70	690.70 USD	Yes
	Date Filed:	1/14/2021								
111	141	No	Aerovías de México, S.A. de C.V.	SUAREZ, FRANCISCO FERNANDEZ ALFA #60 COL ROMERO DE TERREROS ALC COYOACAN CDMX 04310 MEXICO	0.00	0.00	0.00	1,456.70	1,456.70 USD	No
	Date Filed:	12/10/2020								
112	561096160	No	Aerovías de México, S.A. de C.V.	TAXI RANDSTAND VOF WALTMANSTRAAT 75 ZWAANSHOEK AMSTERDAM 2136BB THE NETHERLANDS	0.00	0.00	0.00	1,451.61	1,451.61 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
113	561096220	No	Aerovías de México, S.A. de C.V.	TECHNICAL AIR SRL AVENIDA AVALOS 2148 6° PISO BUENOS AIRES BUENOS AIRES 1431 ARGENTINA	0.00	0.00	0.00	20,287.33	20,287.33 USD	No
	Date Filed:	8/25/2020								
114	561096350	No	Aerovías de México, S.A. de C.V.	TEICA SA DE CV RUBEN M CAMPOS 2612 VILLA DE CORTES BENITO JUAREZ CDMX 3530 MEXICO	0.00	0.00	0.00	19,399.38	19,399.38 USD	No
	Date Filed:	8/25/2020								
115	565024370	No	Aerolitoral, S.A. de C.V.	TEICA SA DE CV RUBEN M CAMPOS 2612 VILLA DE CORTES BENITO JUAREZ CDMX 3530 MEXICO	0.00	0.00	0.00	20,435.74	20,435.74 USD	No
	Date Filed:	8/25/2020								
116	566009900	No	Aerovias Empresa de Cargo, S.A. de C.V.	TEICA SA DE CV RUBEN M CAMPOS 2612 VILLA DE CORTES BENITO JUAREZ CDMX 3530 MEXICO	0.00	0.00	0.00	3,280.84	3,280.84 USD	No
	Date Filed:	8/25/2020								
117	704	No	Aerovías de México, S.A. de C.V.	TEJIDOS Y BLANCOS DE LA CASA SA DE CV ATTN JUAN FERNANDO SOTRES COSIO CALLE SAN JUAN 764, COL GRANJAS MODERNAS GUSTAVO A MADERO CDMX 07460 MEXICO	0.00	0.00	0.00	2,339,946.19	2,339,946.19 MXN	No
	Date Filed:	2/10/2021								
118	14480	No	Aerolitoral, S.A. de C.V.	TELEFONOS DE MEXICO SAB DE CV ATTN ALEJANDRO COCA SANCHEZ AV PARQUE VIA #190, PISO 2 COL CUAUHTEMOC CDMX 06500 MEXICO	0.00	0.00	0.00	13,691.66	13,691.66 USD	No
	Date Filed:	1/15/2021								
119	14500	No	Aerovias Empresa de Cargo, S.A. de C.V.	TELEFONOS DE MEXICO SAB DE CV ATTN ALEJANDRO COCA SANCHEZ AV PARQUE VIA #190, PISO 2 COL CUAUHTEMOC CDMX 06500 MEXICO	0.00	0.00	0.00	22,078.01	22,078.01 USD	No
	Date Filed:	1/15/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
120	561096740	No	Aerovías de México, S.A. de C.V.	TERRAFERTIL MEXICO SAPI DE CV AV INDEPENDENCIA NUM 110 LOTE 4 Y 5 LOS REYES TULTITLAN TULTITLAN DE MARIANO ESCOBEDO ESTADO DE MEXICO 54915 MEXICO	0.00	0.00	0.00	130,996.18	130,996.18 USD	No
	Date Filed:	8/25/2020								
121	10019	No	Aerovías de México, S.A. de C.V.	TOROSQUI SA DE CV HIERRO 20-MZ 21 LT14 RUSTICA XALOSTOC ECATEPEC DE MORELOS, CDMX 55340 MEXICO	0.00	0.00	0.00	313,200.00	313,200.00 MXN	No
	Date Filed:	7/18/2020								
122	20246	No	Aerovías de México, S.A. de C.V.	TRAVELLINK SA DE CV SALAMANCA #40 LOCAL COL ROMA NORTE CDMX 06700 MEXICO	0.00	0.00	0.00	953.91	953.91 USD	No
	Date Filed:	1/12/2021								
123	20284	No	Aerovías de México, S.A. de C.V.	TRAVENTS SA DE CV CERRO DE HUITZILAC 108-302 COL CAMPESTRE CHURUBUSCO MEXICO 04200 MEXICO	0.00	0.00	0.00	675.05	675.05 USD	Yes
	Date Filed:	1/13/2021								
124	20247	No	Aerovías de México, S.A. de C.V.	TRESPALACIOS, CRISTINA BACA JUAN BERNARDO 4120 LA CANADA CHIHUAHUA, CHH 31214 MEXICO	0.00	0.00	0.00	4,262.29	4,262.29 USD	Yes
	Date Filed:	1/12/2021								
125	20248	No	Aerovías de México, S.A. de C.V.	TRESPALACIOS, CRISTINA BACA JUAN BERNARDO 4120 LA CANADA CHIHUAHUA, CHH 31214 MEXICO	0.00	0.00	0.00	678.31	678.31 USD	Yes
	Date Filed:	1/12/2021								
126	565024760	No	Aerolitoral, S.A. de C.V.	TRIP VALLARTA SA DE CV CALLE TLAHUAC 148 CIUDAD DEL SOL ZAPOPAN JALISCO 45050 MEXICO	0.00	0.00	0.00	3,369.69	3,369.69 USD	No
	Date Filed:	8/25/2020								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
127	561098170	No	Aerovías de México, S.A. de C.V.	TUM TRANSPORTISTAS UNIDOS MEXICANOS DIVISION DEL NORTE SA DE CV EUCALIPTO 2 FRACC IND TABLA HONDA TLANEPANTLA DE BAZ MEXICO 54126	0.00	0.00	0.00	5,880.59	5,880.59 USD	No
	Date Filed:	8/25/2020								
128	565024850	No	Aerolitoral, S.A. de C.V.	TUM TRANSPORTISTAS UNIDOS MEXICANOS DIVISION DEL NORTE SA DE CV EUCALIPTO 2 FRACC IND TABLA HONDA TLANEPANTLA DE BAZ MEXICO 54126	0.00	0.00	0.00	14,773.66	14,773.66 USD	No
	Date Filed:	8/25/2020								
129	561098370	No	Aerovías de México, S.A. de C.V.	ULZA SERVICIOS SA DE CV AV REVOLUCION 495 SAN PEDRO DE LOS PINOS BENITO JUAREZ DISTRITO FEDERAL 11590 MEXICO	0.00	0.00	0.00	2,765.59	2,765.59 USD	No
	Date Filed:	8/25/2020								
130	10150	No	Aerolitoral, S.A. de C.V.	URRUSQUIETA, GUADALUPE MARISOL HERNANDEZ MIGUEL A 3261 COL ADOLFO LOPEZ MATEOS VERACRUZ, VER 91778 MEXICO	0.00	0.00	0.00	5,707.20	5,707.20 USD	Yes
	Date Filed:	8/13/2020								
131	10151	No	Aerovías de México, S.A. de C.V.	URRUSQUIETA, GUADALUPE MARISOL HERNANDEZ MIGUEL A 3261 COL ADOLFO LOPEZ MATEOS VERACRUZ, VER 91778 MEXICO	0.00	0.00	0.00	12,487.40	12,487.40 USD	Yes
	Date Filed:	8/13/2020								
132	14821	No	Aerovías de México, S.A. de C.V.	US AIRLINE SERVICES LLC 6055 SURREY ST, STE 102 LAS VEGAS NV 89119	0.00	0.00	0.00	28,148.85	28,148.85 USD	No
	Date Filed:	3/16/2021								
133	392	No	Aerolitoral, S.A. de C.V.	US TECHNICAL CONSULTANTS INC ATTN CLAUDIA DANA PETRISOR, HR/ACCT 2461 E ORANGETHORPE AVE, STE 105 FULLERTON CA 92831	0.00	0.00	0.00	15,455.00	15,455.00 USD	No
	Date Filed:	1/14/2021								

Satisfied Claims

Ref	Claim #	Transferred	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
134	20364	No	Aerovías de México, S.A. de C.V.	VILLANUEVA, PATRICIA CUELLAR VALLE DE UCO NO 21 ZIBATA EL MARQUES, QUE 76269 MEXICO	0.00	0.00	0.00	66.13	66.13 USD	No
	Date Filed:	1/14/2021								
135	20366	No	Aerovías de México, S.A. de C.V.	VILLANUEVA, PATRICIA CUELLAR VALLE DE UCO NO 21 ZIBATA EL MARQUES, QUE 76269 MEXICO	0.00	0.00	0.00	566.58	566.58 USD	No
	Date Filed:	1/14/2021								
136	20355	No	Aerovías de México, S.A. de C.V.	VILLANUEVA, SUSANA CUELLAR ALEMANIA 12 A COL CUMBRES DEL VALLE MCPIO TLALNEPANTLA CDMX 54025 MEXICO	0.00	0.00	0.00	2,258.41	2,258.41 USD	No
	Date Filed:	1/14/2021								
137	20111	No	Aerovías de México, S.A. de C.V.	VIP CLASS AUTO SL OMEGA 46 PLANTA 7 PUERTA B MADRID 28032 SPAIN	0.00	0.00	0.00	7,924.05	7,924.05 USD	No
	Date Filed:	12/14/2020								
138	561106480	No	Aerovías de México, S.A. de C.V.	ZAVALA VALDIVIA JOSE DE JESUS AV IGNACIO ZARAGOZA 409 VALENTIN GOMEZ FARIAS VENUSTIANO CARRANZA DISTRITO FEDERAL 15010 MEXICO	0.00	0.00	0.00	2,682.79	2,682.79 USD	No
	Date Filed:	8/25/2020								
Satisfied Claim Totals				Count:	USD	129	0.00	757,886.65	0.00	10,910,788.61
					MXN	9	0.00	0.00	0.00	6,754,794.10

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' THIRTIETH OMNIBUS CLAIMS
OBJECTION TO PROOFS OF CLAIM (SATISFIED 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' Thirtieth Omnibus Claims Objection to Proofs of Claim (Satisfied 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 Satisfied 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.

Satisfied 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 Satisfied Claim, the Debtors have determined that each Satisfied Claim has been paid and/or otherwise satisfied.

7. If the Satisfied Claims are not disallowed and expunged, the claimants identified on Schedule 1 may obtain double recovery from the same alleged liability, at the expense of the Debtors and other creditors. Accordingly, I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Satisfied Claims as set forth therein and in the Objection.

Conclusion

8. 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 Satisfied Claims is in the best interest of the Debtors' estates.

9. 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 30, 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.