

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

**In re:**

**GRUPO AEROMÉXICO, S.A.B. de C.V., et  
al.,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-11563 (SCC)**

**(Jointly Administered)**

**NOTICE OF ADJOURNMENT OF HEARING TO CONSIDER  
CONFIRMATION OF THE JOINT PLAN OF REORGANIZATION FILED BY THE  
DEBTORS AND RELATED OBJECTION DEADLINES**

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**PLEASE TAKE NOTICE OF THE FOLLOWING:**

1. On December 10, 2021, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) entered an order (the “**Order**”): (a) authorizing the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) to solicit votes on the *Debtors’ Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code* [ECF No. 2293] (as the same may be updated, supplemented, amended and/or otherwise modified from time to time, the “**Plan**”)²; (b) approving the *Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Grupo Aeroméxico, S.A.B. de C.V. and its Affiliated Debtors* [ECF No. 2294] (the “**Disclosure Statement**”) as containing “**adequate information**” pursuant to section 1125 of the Bankruptcy Code; (c) approving the solicitation materials and documents to be included in the solicitation packages (the “**Solicitation Packages**”); and (d) approving procedures for soliciting, receiving and tabulating votes on the Plan and for filing objections to the Plan.

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<sup>1</sup> 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.; 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.

<sup>2</sup> Capitalized terms used but not defined herein shall the meanings ascribed to them in the Plan or Disclosure Statement, as applicable.

2. The hearing at which the Court will consider Confirmation of the Plan (the “**Confirmation Hearing**”) is adjourned to **January 27, 2022 at 10:00 a.m., prevailing Eastern Time**. The Confirmation Hearing will be before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York; *provided* that, pursuant to General Order M-543, dated March 20, 2021 (Morris, C.J.) (“**General Order M-543**”),<sup>3</sup> such Confirmation Hearing will be conducted via **videoconference**. The Debtors will file a subsequent notice on the docket that provides parties-in-interest with instructions regarding how to participate in the Confirmation Hearing via video conference. The Confirmation Hearing may be continued from time to time by the Court or the Debtors **without further notice** other than by such adjournment being announced in open court, by agenda filed with the Court, and/or by a notice of adjournment filed with the Court and served on all parties entitled to notice.

3. Only for the Creditors’ Committee, the U.S. Trustee and the Ad Hoc Group of OpCo Creditors (as defined in the *Verified Statement Pursuant to Bankruptcy Rule 2019* [ECF No. 2179]), the deadline for filing objections to the Plan, including objections to the disallowance of any claim for voting purposes, is **January 18, 2022 at 4:00 p.m., prevailing Eastern Time** (the “**Plan Objection Deadline**”). All other parties were required to file objections to the Plan by January 7, 2022 at 4 p.m., prevailing Eastern Time (unless such time was otherwise extended by the Debtors). Any objection to the Plan must (a) be in writing, (b) in English, (c) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, (d) be filed with the Court (i) by attorneys practicing in the Bankruptcy Court,

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<sup>3</sup> A copy of General Order M-543 can be obtained by visiting <http://www.nysb.uscourts.gov/news/court-operationsunder-exigent-circumstances-created-covid-19>.

including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at <http://www.nysb.uscourts.gov>), and (ii) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and (e) be served in accordance with the *Order Establishing Certain Notice, Case Management, and Administrative Procedures* entered on July 8, 2020 [D.I. 79], on (i) counsel to the Debtors, Davis Polk & Wardwell, LLP, 450 Lexington Avenue, New York, New York 10017, Attn: Timothy Graulich, Josh Sturm and Stephen Piraino, Email: [timothy.graulich@davispolk.com](mailto:timothy.graulich@davispolk.com), [joshua.sturm@davispolk.com](mailto:joshua.sturm@davispolk.com) and [stephen.priaino@davispolk.com](mailto:stephen.priaino@davispolk.com); (ii) counsel to the Creditors Committee, Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Brett Miller, Todd Goren, Craig Damast, and Debra M. Sinclair, Email: [bmiller@willkie.com](mailto:bmiller@willkie.com), [tgoren@willkie.com](mailto:tgoren@willkie.com), [cdamast@willke.com](mailto:cdamast@willke.com), and [dsinclair@willkie.com](mailto:dsinclair@willkie.com); (iii) counsel to Apollo Management Holdings, L.P., Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 1006, Attn: Richard J. Cooper, Luke A. Barefoot, and Thomas S. Kessler, Email: [rcooper@cgsh.com](mailto:rcooper@cgsh.com), [lbarefoot@cgsh.com](mailto:lbarefoot@cgsh.com), and [tkessler@cgsh.com](mailto:tkessler@cgsh.com); (iv) counsel to that certain Ad Hoc Group of Senior Noteholder, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, New York 10036, Attention: David H. Botter and Abid Qureshi, Email: [dbotter@akingump.com](mailto:dbotter@akingump.com) and [aqureshi@akingump.com](mailto:aqureshi@akingump.com); (v) counsel to that certain ad hoc group of unsecured claimholders, Gibson Dunn & Crutcher LLP, 200 Park Avenue, New York, New York 10166, Attention: Joshua Brody and Matthew J. Williams, Email: [jbrody@gibsondunn.com](mailto:jbrody@gibsondunn.com) and [mjwilliams@gibsondunn.com](mailto:mjwilliams@gibsondunn.com); (vi) counsel to those certain entities for which any of the The Baupost Group, L.L.C., Silver Point Capital, L.P. and Oaktree Capital Management, L.P. serve as

investment manager, advisor, subadvisor, or accounts or sub-accounts directly or indirectly under any of their management, Milbank LLP, 55 Hudson Yards, New York, New York 10001, Attention: Dennis F. Dunne, Esq. and Matt Brod, Email: ddunne@milbank.com and mbrod@milbank.com; and (vii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York, Attn: Andrea Beth Schwartz, Email: andrea.b.schwartz@usdoj.gov, so as to be actually received on or before the Plan Objection Deadline.

4. The Debtors shall file the Confirmation Brief and Omnibus Reply to Plan objections on or before **January 24, 2022 at 12:00 p.m., prevailing Eastern Time.**

5. If a controversy arises regarding whether any Claim is properly classified under the Plan, the Bankruptcy Court shall, upon proper motion and notice, determine such controversy at the Confirmation Hearing. If the Bankruptcy Court finds that the classification of any Claim is improper, then such Claim shall be reclassified and the Ballot previously cast by the holder of such Claim shall be counted in, and the Claim shall receive the treatment prescribed in, the Class in which the Bankruptcy Court determines such Claim should have been classified, without the necessity of resoliciting any votes on the Plan.

6. If confirmed, the Plan shall bind all holders of Claims and Interests to the maximum extent permitted by applicable law, whether or not such holder will receive or retain any property or interest in property under the Plan, has filed a Proof of Claim in these Chapter 11 Cases, or failed to vote to accept or reject the Plan or voted to reject the Plan. All rights and remedies that may be available under any non-US jurisdiction, including Mexican law, for further distributions or recoveries on account of the same Claim or Interest will be waived pursuant to the confirmed Plan.

7. If you should have any questions or if you would like to obtain the Plan, Disclosure Statement or any additional solicitation materials at no charge, please contact Epiq Corporate Restructuring, LLC (the “**Claims and Solicitation Agent**”) by: (a) visiting the Debtors’ case website (the “**Case Website**”) located at <https://dm.epiq11.com/case/aeromexico>; (b) calling the Claims and Solicitation Agent at (855) 917-3578 (toll-free U.S.) or +1 (503) 520-4473 (if calling from outside the U.S.); and/or (c) emailing the Claims and Solicitation Agent at [aeromexicoinfo@epiqglobal.com](mailto:aeromexicoinfo@epiqglobal.com). You may also access these materials for a fee via PACER at <https://www.nysb.uscourts.gov/>. Please be advised that the Claims and Solicitation Agent is authorized to answer questions about, and provide additional copies of, solicitation materials, but may **not** advise you of your legal rights under the Plan or as to whether you should vote to accept or reject the Plan.

Dated: January 9, 2022  
New York, New York

DAVIS POLK & WARDWELL LLP

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