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Counsel for Sabre Global Technologies, Limited and Sabre GLBL Inc.

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

In re:

GRUPO AEROMÉXICO, S.A.B. de C.V., *et al.*,

Debtors.

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Wilmer Cutler Pickering Hale and Dorr LLP hereby enters its appearance as counsel to Sabre Global Technologies, Limited and Sabre GLBL Inc. (“Sabre”), pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and sections 102(1), 342 and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), and requests that copies of all notices given or required to be given in the above-captioned bankruptcy cases be given and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand is not only for the notices and papers referred to in the sections of the Bankruptcy Code and the Bankruptcy Rules specified above, but also includes, without limitation, any and all orders and notices of any application, motion, petition, complaint, demand, request or other pleading in the bankruptcy cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronically or otherwise filed with or delivered to the Bankruptcy Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001), which affects the Debtors, or property of the Debtors or proceeds thereof, or Sabre.

PLEASE TAKE FURTHER NOTICE that this notice of appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive any right: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in any non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which Sabre or any other person is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: July 14, 2020
New York, New York

/s/ Philip D. Anker
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*Counsel for Sabre Global Technologies, Limited
and Sabre GBL Inc.*

CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of July 2020, a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Papers* was served upon all counsel of record using the Court's CM/ECF system.

/s/ Philip D. Anker

Philip D. Anker

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