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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.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-11563 (SCC)

(Jointly Administered)

**STATEMENT OF DELTA AIR LINES, INC. REGARDING MOTION  
OF DEBTORS FOR INTERIM AND FINAL ORDERS (I)  
AUTHORIZING DEBTORS TO HONOR INTERLINE AGREEMENTS,  
CLEARINGHOUSE AGREEMENTS, INDUSTRY AGREEMENTS,  
PROTECTION AGREEMENTS, ALLIANCE AGREEMENTS, DELTA  
AIRLINES AGREEMENTS, CLUB PREMIER LOYALTY PROGRAM  
AGREEMENTS AND PREPETITION OBLIGATIONS RELATED  
THERE TO, (II) MODIFYING THE AUTOMATIC STAY SOLELY TO  
THE EXTENT NECESSARY TO EFFECTUATE THE INTENDED  
RELIEF AND (III) AUTHORIZING FINANCIAL INSTITUTIONS TO  
HONOR AND PROCESS RELATED CHECKS AND TRANSFERS**

Delta Air Lines, Inc. ("Delta"), by and through the undersigned counsel, submits this statement ("Statement") regarding the *Motion of Debtors for Interim and Final Orders (i) Authorizing Debtors to Honor Interline Agreements, Clearinghouse Agreements, Alliance*

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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. 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.

*Agreements, Delta Airlines Agreements, Club Premier Loyalty Program Agreements and Prepetition Obligations Related Thereto, (ii) Modifying the Automatic Stay Solely to the Extent Necessary to Effectuate the Intended Relief and (iii) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers* [ECF No. 11] (the “Agreements Motion”) as it relates to the Delta Agreements as further described in the Agreements Motion and Exhibit G thereto (the “Delta Contracts”). In support of this Statement, Delta respectfully states as follows:

**Statement**

1. Delta is conducting an analysis as to the Delta Contracts subject to the Agreements Motion. It intends to engage with the Debtors in an attempt to reconcile, and if necessary correct, the list of Delta Contracts being assumed pursuant to the Agreements Motion so that any proposed order approving the Agreements Motion reflects the current outstanding contractual relationships between Delta and the Debtors. Delta expects to reach a resolution in advance of the Agreements Motion hearing date, which is currently scheduled for July 29, 2020 at 10:30 a.m. (prevailing Eastern Time).

2. Delta reserves its rights with respect to the Agreements Motion and any and all other rights under applicable law as it relates to the Delta Agreements and any and all other matters in these Chapter 11 cases related to Delta.

Dated: July 22, 2020  
New York, New York

**HUGHES HUBBARD & REED LLP**

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