

**WILLKIE FARR & GALLAGHER LLP**

Brett H. Miller  
Todd M. Goren  
Craig Damast  
Debra M. Sinclair

787 Seventh Avenue  
New York, New York 100019  
Telephone: 212-728-8000  
Facsimile: 212-728-8111  
bmiller@willkie.com  
tgoren@willkie.com  
cdamast@willkie.com  
dsinclair@willkie.com

*Proposed Counsel to the Official Committee of  
Unsecured Creditors of Grupo Aeroméxico, S.A.B. de C.V., et al.*

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

|   |   |                         |
|---|---|-------------------------|
| _____   | ) |                         |
| In re:  | ) | Chapter 11              |
|   | ) |                         |
| GRUPO AEROMÉXICO, S.A.B. de C.V., <i>et al.</i> , | ) | Case No. 20-11563 (SCC) |
|   | ) |                         |
|   | ) |                         |
| Debtors. <sup>1</sup>                             | ) | (Jointly Administered)  |
| _____   | ) |                         |

**NOTICE OF APPEARANCE AND REQUEST FOR  
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

**PLEASE TAKE NOTICE** that, pursuant to section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Official Committee of Unsecured Creditors of Grupo Aeroméxico, S.A.B. de C.V. (the “Committee”), on behalf of themselves, and Willkie Farr & Gallagher LLP, as proposed counsel to the Committee, hereby appear in the above-captioned

<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.

Chapter 11 cases of Grupo Aeroméxico, S.A.B. de C.V., *et al.* (the “Debtors”) and requests, pursuant to Bankruptcy Rules 2002, 9007 and 9010, and Bankruptcy Code section 342, that all papers, pleadings, motions and applications served or required to be served in this case, be given to and served upon the following:

**WILLKIE FARR & GALLAGHER LLP**

787 Seventh Avenue  
New York, New York 10019  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111

Attn: Brett H. Miller, Esq.  
Todd M. Goren, Esq.  
Craig Damast, Esq.  
Debra M. Sinclair, Esq.

Email: bmill@willkie.com  
tgoren@willkie.com  
cdamast@willkie.com  
dsinclair@willkie.com

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and the papers referred to in the Bankruptcy Rules and the Bankruptcy Code specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by ordinary mail, hand delivery, telephone, facsimile, electronic mail, or otherwise, which may affect or seek to affect in any way any rights or interests of the Committee with respect to the Debtors’ estates, or any related entities, or property or proceeds thereof in which the Debtors’ estates may claim an interest.

**PLEASE TAKE FURTHER NOTICE** that this appearance shall not be deemed or construed to be a waiver of the right of the Committee (i) to have final orders in non-core matters

entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or any case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which the Committee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Committee expressly reserves.

Dated: New York, New York  
May 5, 2021

WILLKIE FARR & GALLAGHER LLP

By: /s/ Brett H. Miller  
Brett H. Miller  
Todd M. Goren  
Craig Damast  
Debra M. Sinclair

787 Seventh Avenue  
New York, New York 10019  
Telephone: 212-728-8000  
Facsimile: 212-728-8111

*Proposed Attorneys for the Official  
Committee of Unsecured Creditors of Grupo  
Aeroméxico, S.A.B. de C.V., et al.*