

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE DEBTORS' TWENTY-SECOND 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 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), ORMOSHE MELCER (moshe.melcer@davispolk.com or +1-732-606-3155).**

**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 HEARING ON DEBTORS' TWENTY-SECOND OMNIBUS CLAIMS  
OBJECTION TO PROOFS OF CLAIM (SATISFIED CLAIMS)**

**PLEASE TAKE NOTICE** that, on October 4, 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 *Twenty-Second 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

<sup>1</sup> 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.

Court disallow and expunge one or more of your Claims<sup>2</sup> listed on Schedule 1 to Exhibit 1 of the Objection annexed hereto on the grounds that such Claims have been paid or otherwise satisfied after the Petition Date in accordance with the Bankruptcy Code, applicable rules, or an order issued by the Bankruptcy Court (the “**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 disallowance and expungement 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 disallowance and expungement 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 **November 4, 2021 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

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<sup>2</sup> Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

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), Erik P. Jerrard (erik.jerrard@davispolk.com), and Richard J. Steinberg (richard.steinberg@davispolk.com)), counsel to the Debtors; and (iii) 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 **November 16, 2021 at 11:00 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](http://www.court-solutions.com)). Instructions to register for CourtSolutions, LLC are attached to General Order M-543.<sup>3</sup>

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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-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: October 4, 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  
Facsimile: (212) 701-5800  
Marshall S. Huebner  
Timothy Graulich  
James I. McClammy  
Stephen D. Piraino  
Erik Jerrard (admitted *pro hac vice*)

*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.<sup>1</sup>**

**Chapter 11**

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

**(Jointly Administered)**

**DEBTORS' TWENTY-SECOND 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 (AS DEFINED HEREIN) 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 *Twenty-*

<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; 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.

*Second Omnibus Claims Objection to Proofs of Claim (Satisfied Claims)* (the “**Objection**”), pursuant to the *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 Twenty-Second Omnibus 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.<sup>2</sup>

### **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

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<sup>2</sup> Schedule 1 to the Proposed Order is incorporated herein by reference.



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.

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 18 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.

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). A debtor may file an omnibus claims objection if all the claims being objected to fall under one of several listed categories, including claims that “have been satisfied or released during the case in accordance with the Code, applicable rules, or a court order.” See Fed. R. Bankr. P. 3007(d)(5); see also Claims Obj. Proc. Order, ¶ 2(a), ECF No. 904.

### **Objection**

22. The Debtors object to the Claims listed on Schedule 1 to the Proposed Order (“**Schedule 1**”) and request that each such Satisfied Claim be disallowed and expunged in its entirety. 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). In fact, certain of the Satisfied Claims have been paid or otherwise satisfied pursuant to the Court's First Day Orders.

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 on account of the same Claim 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 of the Claims and the 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 a request 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)  
Erik P. Jerrard (erik.jerrard@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, expunged, reduced, or reclassified 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. Unless the Satisfied Claims are disallowed and expunged, the Debtors reserve their right (i) to object to the Satisfied Claims on any other grounds that the Debtors discover or elect to pursue and/or (ii) to assert substantive and/or one or more additional non-substantive objections at a later time.

29. Notwithstanding anything contained in this Objection or the exhibits or schedules 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: October 4, 2021  
New York, New York

DAVIS POLK & WARDWELL LLP

By: /s/ Timothy Graulich

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New York, New York 10017  
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James I. McClammy  
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Erik Jerrard (admitted *pro hac vice*)

*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.<sup>1</sup>**

**Chapter 11**

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

**(Jointly Administered)**

**ORDER GRANTING DEBTORS' TWENTY-SECOND OMNIBUS CLAIMS  
OBJECTION TO PROOFS OF CLAIM (SATISFIED CLAIMS)**

Upon the objection (the “**Objection**”)<sup>2</sup> 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

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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; 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.

<sup>2</sup> Each capitalized term used herein but not otherwise defined herein shall have the meaning ascribed to it in the Objection.

hearing on the Objection; and the Court having determined that the legal and factual bases set forth 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:**

1. The Objection is hereby granted as set forth herein.
2. The Satisfied Claims identified on Schedule 1 annexed hereto are hereby disallowed and expunged in their entirety.
3. 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.
4. 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.
5. 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.

6. 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: \_\_\_\_\_, 2021  
New York, New York

\_\_\_\_\_  
THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE

**Schedule 1**

**Satisfied Claims**

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
1	10413	Aerovías de México, S.A. de C.V.	GERHARDS, MICHAEL VAN BREETRAAT 170 AMSTERDAM, NH 1071ZX NETHERLANDS	0.00	0.00	0.00	1,278.72	1,278.72 USD	No
	<b>Date Filed:</b>	1/15/2021							
2	14650	Aerovías de México, S.A. de C.V.	GONZALEZ, MARLENE 2308 CROCKER LN MODESTO CA 95358	0.00	0.00	3,000.00	0.00	3,000.00 USD	No
	<b>Date Filed:</b>	12/11/2020							
3	10390	Aerovías de México, S.A. de C.V.	GREENE, ALAN 215 SAINT ANDREWS ST VICTORIA BC V8V 2N1 CANADA	0.00	0.00	0.00	824.90	824.90 USD	No
	<b>Date Filed:</b>	1/3/2021							
4	11394	Aerovías de México, S.A. de C.V.	GRUSS, ERIC 7 RUE DES DAHLIAS JACOU 34830 FRANCE	0.00	0.00	0.00	4,429.00	4,429.00 USD	No
	<b>Date Filed:</b>	12/22/2020							
5	10616	Aerovías de México, S.A. de C.V.	HANSEN, MARK JORDAN 370 MOCLIFF RD EPHRATA WA 98823	0.00	0.00	1,651.16	0.00	1,651.16 USD	No
	<b>Date Filed:</b>	12/13/2020							
6	10443	Aerovías de México, S.A. de C.V.	HETHERINGTON, CHERYL 5719 MAKATICIR, APT A SAN JOSE CA 95123	0.00	0.00	0.00	1,050.00	1,050.00 USD	No
	<b>Date Filed:</b>	1/5/2021							
7	11814	Aerovías de México, S.A. de C.V.	HISHIDA, MASAKO PRIVADA UNO #4590 ETRE VIOSCA Y JOSEFA ORTIZ DE DOMINGUEZ FRACC. MARIA CONCHITA LA PAZ BCS, 23098 MEXICO	0.00	0.00	0.00	4,800.00	4,800.00 USD	No
	<b>Date Filed:</b>	1/8/2021							
8	12132	Aerovías de México, S.A. de C.V.	HSU, YAPING 2F NO225 SEC 3 NANJING EAST ROAD TAIPEI 104 TAIPEI 104 TAIWAN	0.00	0.00	0.00	570.10	570.10 USD	No
	<b>Date Filed:</b>	1/4/2021							
9	11618	Aerovías de México, S.A. de C.V.	JACOBSON, MARC GROSS 3505 E JOHN ST SEATTLE WA 98112	0.00	0.00	0.00	2,327.76	2,327.76 USD	No
	<b>Date Filed:</b>	1/5/2021							
10	11736	Aerovías de México, S.A. de C.V.	JANG, YEONSOO 1642 JANGGIDONG GIMPO-SI, GYEONGGI-DO 10085 SOUTH KOREA	0.00	0.00	0.00	442.85	442.85 USD	No
	<b>Date Filed:</b>	1/3/2021							



## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
11	11435	Aerovías de México, S.A. de C.V.	JEONG, SUJIN 10, BUIL-RO 5-GIL, GURO-GU #502, DAON CASTLE SEOUL, 08260 REPUBLIC OF KOREA	0.00	0.00	0.00	727.40	727.40 USD	No
	<b>Date Filed:</b>	1/5/2021							
12	11809	Aerovías de México, S.A. de C.V.	JEOUNG, SEONHWA 64, GEOBUNGMARU-RO, DONGDUCHEON-SI GYEONGGI-DO, 11346 SOUTH KOREA	0.00	0.00	0.00	952.32	952.32 USD	No
	<b>Date Filed:</b>	1/11/2021							
13	12841	Aerovías de México, S.A. de C.V.	KANEKO, TOKUKO 1-3-3, HAMADA MITO CITY IBARAKI 3100812 JAPAN	0.00	0.00	0.00	4,085.62	4,085.62 USD	No
	<b>Date Filed:</b>	1/10/2021							
14	12505	Aerovías de México, S.A. de C.V.	KANG, MINJUNG 38, DASANJUNGANG-RO 145BEON-GIL NAMYANGJU-SI 12248 SOUTH KOREA	0.00	0.00	0.00	1,489.56	1,489.56 USD	No
	<b>Date Filed:</b>	1/7/2021							
15	12045	Aerovías de México, S.A. de C.V.	KIKUCHI, MIKA A5TOU 535 OZAKIDANCHI OZAKINISHIMACHI 3-1 KAKAMIGAHARA 5040004 JAPAN	0.00	0.00	0.00	1,193.00	1,193.00 USD	No
	<b>Date Filed:</b>	1/15/2021							
16	14634	Aerovías de México, S.A. de C.V.	KIM, DAVE 8310 BUFFALO SPEEDWAY HOUSTON TX 77025	0.00	0.00	0.00	3,655.95	3,655.95 USD	No
	<b>Date Filed:</b>	1/4/2021							
17	11485	Aerovías de México, S.A. de C.V.	KIM, JIN YOUNG GYEONGGI-DO HWASEONG-SI BANWOL-DONG 944, 102-801 GYEONGGI-DO 18396 SOUTH KOREA	0.00	0.00	0.00	952.32	952.32 USD	No
	<b>Date Filed:</b>	1/4/2021							
18	11614	Aerovías de México, S.A. de C.V.	KIM, MOON JOO 45 SEOGANG-RO 9-GIL MAPO-GU SEOUL, 04060 REPUBLIC OF KOREA	0.00	0.00	0.00	2,339.65	2,339.65 USD	No
	<b>Date Filed:</b>	12/17/2020							
19	10526	Aerovías de México, S.A. de C.V.	KJUN, CHO HYU 205-501, AJU 2 RO 2 GIL 13 GEOJE-SI 53306 SOUTH KOREA	0.00	0.00	0.00	1,351.66	1,351.66 USD	Yes
	<b>Date Filed:</b>	1/1/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
20	11257	Aerovías de México, S.A. de C.V.	KWON, DAHEE 2ND FLOOR, 3, DUNCHON- DAERO 170BEON-GIL JUNGWON-GU SEONGNAM-SI, GYEONGGI-DO 13386 SOUTH KOREA	0.00	0.00	0.00	1,122.19	1,122.19 USD	No
	<b>Date Filed:</b>	1/13/2021							
21	13433	Aerovías de México, S.A. de C.V.	LAVERTU, FRANCOISE 1319 CRES REDPATH MONTREAL QB H3G 1A1 CANADA	0.00	0.00	3,025.00	253.00	3,278.00 USD	No
	<b>Date Filed:</b>	1/5/2021							
22	11850	Aerovías de México, S.A. de C.V.	LEE, EUJUNG 2-107 YEOUNARURO 121 YEONGDEUNGPO-GU SEOUL 07336 SOUTH KOREA	0.00	0.00	0.00	500.00	500.00 USD	No
	<b>Date Filed:</b>	12/28/2020							
23	10919	Aerovías de México, S.A. de C.V.	LEE, HYEONGJUN 300, DASANSUNHWAN-RO 1527-503 NAMYANGJU-SI 12285 SOUTH KOREA	0.00	0.00	0.00	940.43	940.43 USD	No
	<b>Date Filed:</b>	1/11/2021							
24	12804	Aerovías de México, S.A. de C.V.	LEE, SOOMI AND JUHA 90-13 SANCHON-DONG-GIL, MASANHOEWON-GU CHANGWON-SI 51366 SOUTH KOREA	0.00	0.00	0.00	2,680.07	2,680.07 USD	Yes
	<b>Date Filed:</b>	1/3/2021							
25	11432	Aerovías de México, S.A. de C.V.	LEE, YURI 10, BUIL-RO 5-GIL, GURO-GU #502, DAON CASTLE SEOUL, 08260 REPUBLIC OF KOREA	0.00	0.00	0.00	727.40	727.40 USD	No
	<b>Date Filed:</b>	1/5/2021							
26	11743	Aerovías de México, S.A. de C.V.	LIM, EUNJU 86, MUNSEONG-RO, GWANAK- GU LIFE APT 101-1302 HO SEOUL 08863 SOUTH KOREA	0.00	0.00	0.00	2,020.00	2,020.00 USD	No
	<b>Date Filed:</b>	1/13/2021							
27	20259	Aerovías de México, S.A. de C.V.	LOPEZ ORTEGA, ELENA DELGADO OCANA, 26 - 2A MADRID ES 28047 SPAIN	0.00	0.00	0.00	3,622.00	3,622.00 USD	Yes
	<b>Date Filed:</b>	12/13/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
28	20104	Aerovías de México, S.A. de C.V.	LOPEZ, EDUARDO IVAN ANDREU C/MADERA 16 URBANIZACION SEVILL-GOLF ALCALA DE GUADAIRA, SE 41500 SPAIN	0.00	0.00	0.00	3,000.31	3,000.31 USD	No
	<b>Date Filed:</b>	12/16/2020							
29	20120	Aerovías de México, S.A. de C.V.	LOPEZ, GUILLERMO ROMO PASEO DE LAS ARBOLEDAS #176 FRACC. POTOSINO DE GOLF SAN LUIS POTOSI 78153 MEXICO	0.00	0.00	0.00	135.78	135.78 USD	No
	<b>Date Filed:</b>	1/3/2021							
30	20162	Aerovías de México, S.A. de C.V.	LOPEZ, PAULA FLAT 56 TRAMWAY CT 3 CANDLE ST LONDON, E1 4RR UNITED KINGDOM	0.00	0.00	0.00	600.00	600.00 USD	No
	<b>Date Filed:</b>	1/14/2021							
31	14032	Aerovías de México, S.A. de C.V.	LORENÇANI, FABIANA DE CASSIA RUA LORD COCKRANE, 26 AP 192 IPIRANGA SAO PAULO SP 04213000 BRAZIL	0.00	0.00	0.00	1,235.36	1,235.36 USD	No
	<b>Date Filed:</b>	12/16/2020							
32	10502	Aerovías de México, S.A. de C.V.	LYONS, THOMAS 179 MORTON RD SPRINGFIELD PA 19064	0.00	0.00	0.00	404.95	404.95 USD	No
	<b>Date Filed:</b>	1/14/2021							
33	14005	Aerovías de México, S.A. de C.V.	MALOUA, SAMUEL 1 BIS PASSAGE DE LAGNY PARIS 75020 FRANCE	0.00	0.00	0.00	2,589.50	2,589.50 USD	No
	<b>Date Filed:</b>	12/14/2020							
34	146	Aerovías de México, S.A. de C.V.	MANONI, ALEX S 724 LAUREL DR EVERETT WA 98201	0.00	0.00	0.00	966.88	966.88 USD	No
	<b>Date Filed:</b>	12/18/2020							
35	169	Aerovías de México, S.A. de C.V.	MARCH, ELEANOR R 2124 RONDA GRANADA, UNIT N LAGUNA WOODS CA 92637	0.00	0.00	0.00	535.02	535.02 USD	No
	<b>Date Filed:</b>	12/12/2020							
36	10415	Aerovías de México, S.A. de C.V.	MARCHESI, LUCA VIA FOSCOLO 14 20089 ROZZANO MI 20089 ITALY	0.00	0.00	0.00	644.72	644.72 USD	No
	<b>Date Filed:</b>	12/31/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
37	20159	Aerovías de México, S.A. de C.V.	MARIA DEL CONSUELO ORTIZ FIGUEROA 27 PONIENTE 706C COL CHULA VISTA PUE 72420 MEXICO	0.00	0.00	0.00	2,133.93	2,133.93 USD	No
	<b>Date Filed:</b>	1/15/2021							
38	20412	Aerovías de México, S.A. de C.V.	MARTINEZ, EDUARDO IÑIGO BOULEVARD MONT DE MARCAN 4ª. TUDELA TUDELA DE NAVARRA 31500 SPAIN	0.00	0.00	0.00	846.62	846.62 USD	No
	<b>Date Filed:</b>	1/11/2021							
39	12745	Aerovías de México, S.A. de C.V.	MARTINEZ, MARJORIE SAILLARD LE DOMAINE DE BRUNOY 1 RUE JEAN XXIII BRUNOY 91800 FRANCE	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/16/2020							
40	10500	Aerovías de México, S.A. de C.V.	MATEO, SERGIPOUS C/. MANUEL CARRASCO I FORMIGUERA Nº 4 B CARDEDEU, ES 08440 SPAIN	0.00	0.00	0.00	878.93	878.93 USD	No
	<b>Date Filed:</b>	12/13/2020							
41	10428	Aerovías de México, S.A. de C.V.	MERLE, CLEMENTINE 3 RUE HENRI DE GONDI BAILLY 78870 FRANCE	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/24/2020							
42	183	Aerovías de México, S.A. de C.V.	MEYER, RICHARD BRUCE 813 FOREST WILLOW CIR EL PASO TX 79922	0.00	0.00	0.00	1,108.02	1,108.02 USD	No
	<b>Date Filed:</b>	1/13/2021							
43	317	Aerovías de México, S.A. de C.V.	MILLER, CHERYL 17505 EASON AVE BOTHHELL WA 98011	0.00	0.00	0.00	427.33	427.33 USD	No
	<b>Date Filed:</b>	1/14/2021							
44	13664	Aerovías de México, S.A. de C.V.	MIN, KYOUNGHO 101-507, 46, YANGCHEON-RO 62-GIL, GANGSEO-GU SEOUL 07550 REPUBLIC OF KOREA	0.00	0.00	0.00	453.91	453.91 USD	No
	<b>Date Filed:</b>	1/12/2021							
45	13028	Aerovías de México, S.A. de C.V.	MIRACLE TM 35 RUE DE LA MARE PARIS, FR 75020 FRANCE	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	1/11/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
46	20218	Aerovías de México, S.A. de C.V.	MITO CONCERTS SL RONDA DEL CANIGO A7 C10 ESPLUGUES DE LLOBREGAT 08950 SPAIN	0.00	0.00	0.00	1,014.87	1,014.87 USD	Yes
	<b>Date Filed:</b>	1/14/2021							
47	20396	Aerovías de México, S.A. de C.V.	MONTES DE OCA MARTIN, SELMA 66 INNISWOOD DR TORONTO ON M1R 1E5 CANADA	0.00	0.00	0.00	994.89	994.89 USD	Yes
	<b>Date Filed:</b>	1/15/2021							
48	14441	Aerovías de México, S.A. de C.V.	MOON, CHAN YOUNG 55 SAEROM-RO 1106-1701 SEJONG-SI 30127 SOUTH KOREA	0.00	0.00	0.00	2,532.74	2,532.74 USD	No
	<b>Date Filed:</b>	1/6/2021							
49	11958	Aerovías de México, S.A. de C.V.	MOON, JOONHO CYSIL-DO DONGRAE-DO NO 116-DONG, 2801, IPARK, 49 BUSAN 47756 SOUTH KOREA	0.00	0.00	0.00	642.74	642.74 USD	No
	<b>Date Filed:</b>	1/5/2021							
50	11686	Aerovías de México, S.A. de C.V.	MOON, SUNGMI 138, AJUNG-RO, DEOKJIN-GU #301 JEONJU-SI 55030 SOUTH KOREA	0.00	0.00	0.00	521.74	521.74 USD	No
	<b>Date Filed:</b>	12/9/2020							
51	20087	Aerovías de México, S.A. de C.V.	MORALES, FREDDY RAUL SANCHEZ SAN JUAN DE TIBAS 75M NORTE DE PALI COLIMA DE TIBAS SAN JOSÉ, 11301 COSTA RICA	0.00	0.00	0.00	2,385.33	2,385.33 USD	No
	<b>Date Filed:</b>	12/18/2020							
52	10537	Aerovías de México, S.A. de C.V.	MOULIN, MAXENCE 13 B RUE FRANCOIS BOVAGNE IMMUEBLE LES TERRASSES SEYSSEL, 01420 FRANCE	0.00	0.00	0.00	499.52	499.52 USD	No
	<b>Date Filed:</b>	12/18/2020							
53	20126	Aerovías de México, S.A. de C.V.	MOULIN, PIERRE ANTOINE 1 COURS FAURIEL SAINT-ÉTIENNE, 42100 FRANCE	0.00	0.00	0.00	105.03	105.03 USD	No
	<b>Date Filed:</b>	12/24/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
54	20144	Aerovías de México, S.A. de C.V.	MUÑOZ, MARIA RAQUEL CUADRA SAN CARLOS 205 FRACCIONAMIENTO SAN JORGE LEON, GT 37289 MEXICO	0.00	0.00	0.00	2,410.81	2,410.81 USD	No
	<b>Date Filed:</b>	12/27/2020							
55	10773	Aerovías de México, S.A. de C.V.	NA, YEOJIN 417/1102 70,DOLMI-RO,OKPO- EUP,DAEGU DAEGU 42974 SOUTH KOREA	0.00	0.00	0.00	5,896.95	5,896.95 USD	No
	<b>Date Filed:</b>	1/5/2021							
56	11803	Aerovías de México, S.A. de C.V.	NA, YONGHYEON 64 GEOBUNGMARU-RO DONGDUCHEON-SI GYEONGGI-DO 11346 SOUTH KOREA	0.00	0.00	0.00	952.32	952.32 USD	No
	<b>Date Filed:</b>	1/15/2021							
57	20444	Aerovías de México, S.A. de C.V.	NAKAGAWA, FEDERICO VON HAUSKE CALLE DE LA BRIDA #12 FRACC. EL PORVENIR SAN JUAN DEL RIO, QT 76815 MEXICO	0.00	0.00	0.00	1,165.13	1,165.13 USD	No
	<b>Date Filed:</b>	2/17/2021							
58	14780	Aerovías de México, S.A. de C.V.	NAKAGO, HIROKI 1002-2-19-3 HIGASHI-SHINGAWA SHINAGAWA-KU, TOKYO 140- 0002 JAPAN	0.00	0.00	0.00	3,322.73	3,322.73 USD	No
	<b>Date Filed:</b>	12/30/2020							
59	11116	Aerovías de México, S.A. de C.V.	NAM, TAEKSEONG 22, INHYEONJUNGANG-GIL DANWON-GU ANSAN-SI, GYEONGGI-DO 15345 SOUTH KOREA	0.00	0.00	0.00	1,040.12	1,040.12 USD	No
	<b>Date Filed:</b>	1/4/2021							
60	230	Aerovías de México, S.A. de C.V.	NANCY MURRAY FOR ELIZABETH MURRAY 1312 SANDCASTLE DR CORONA DEL MAR CA 92625	0.00	0.00	0.00	1,531.60	1,531.60 USD	No
	<b>Date Filed:</b>	12/29/2020							
61	20151	Aerovías de México, S.A. de C.V.	NAZABAL, MARIA CARMEN 20 RUE D'HAPETENIA HENDAYE, 64700 FRANCE	0.00	0.00	0.00	1,256.00	1,256.00 USD	No
	<b>Date Filed:</b>	1/14/2021							
62	14136	Aerovías de México, S.A. de C.V.	NEIRA, JULIANA PACHON CALLE 127C 46 23 BOGOTA 11111 COLOMBIA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/15/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
63	10495	Aerovías de México, S.A. de C.V.	NICACIO, LUZ CASSANDRA PO BOX 233 LOMPOC CA 93438	0.00	0.00	0.00	694.44	694.44 USD	No
	<b>Date Filed:</b>	1/14/2021							
64	13839	Aerovías de México, S.A. de C.V.	NISSAN CREATIVE SERVICES COLTD 4TH FLOOR FORECAST KAYABACHO 1-10-14, SHINKAWA, CHUO-KU TOKYO 104-0033 JAPAN	0.00	0.00	0.00	439.00	439.00 USD	No
	<b>Date Filed:</b>	1/14/2021							
65	13617	Aerovías de México, S.A. de C.V.	NISSAN TRAVEL SERVICE CO LTD 1-32-2, HONCHO, NAKANO-KU TOKYO 164-0012 JAPAN	0.00	0.00	0.00	2,552.78	2,552.78 USD	No
	<b>Date Filed:</b>	1/15/2021							
66	14501	Aerovías de México, S.A. de C.V.	OCEANTUR SA PARAGUAY 577 2B CAPITAL FEDERAL BA 1057 ARGENTINA	0.00	0.00	0.00	184.00	184.00 USD	No
	<b>Date Filed:</b>	12/9/2020							
67	10333	Aerovías de México, S.A. de C.V.	ONG, TENG FENG CHARLES 19 FERNVALE LANE THE TOPIARY #17-23 797499 SINGAPORE	0.00	0.00	0.00	295.11	295.11 USD	No
	<b>Date Filed:</b>	1/15/2021							
68	14319	Aerovías de México, S.A. de C.V.	OROZCO, MAYKEL 64 ISHI CIR SACRAMENTO CA 95833	0.00	0.00	0.00	396.38	396.38 USD	No
	<b>Date Filed:</b>	1/12/2021							
69	20241	Aerovías de México, S.A. de C.V.	PADIN RAMOS, ANA CALLEJON DE LA IGLESIA, 1, 1B MADRID 28860 SPAIN	0.00	0.00	0.00	1,029.18	1,029.18 USD	Yes
	<b>Date Filed:</b>	1/18/2021							
70	14706	Aerovías de México, S.A. de C.V.	PALMATECHNOLOGY COLTD 364 POSCO-DAERO NAM-GU POHANG-SI 37821 REPUBLIC OF KOREA	0.00	0.00	0.00	2,553.44	2,553.44 USD	Yes
	<b>Date Filed:</b>	1/13/2021							
71	318	Aerovías de México, S.A. de C.V.	PALOMO, MARIO HECTOR 1303 LARKIN ST, #506 SAN FRANCISCO CA 94109	0.00	0.00	0.00	751.86	751.86 USD	No
	<b>Date Filed:</b>	1/12/2021							
72	12892	Aerovías de México, S.A. de C.V.	PAPAMICHAIL, DIMITRIOS KARAOLI & DIMITRIOU 18 NEA PENTELE, ATHENS 15236 GREECE	0.00	0.00	0.00	525.27	525.27 USD	No
	<b>Date Filed:</b>	12/18/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
73	10552	Aerovías de México, S.A. de C.V.	PAQUETTE, TANYA 52-18181 68 AVE SURREY BC V3S 9J1 CANADA	0.00	0.00	0.00	658.75	658.75 USD	No
	<b>Date Filed:</b>	1/15/2021							
74	14418	Aerovías de México, S.A. de C.V.	PARDE, KARINE 32A BRAMSHILL GARDENS LONDON NW5 1JH UNITED KINGDOM	0.00	0.00	0.00	3,119.26	3,119.26 USD	No
	<b>Date Filed:</b>	1/13/2021							
75	20302	Aerovías de México, S.A. de C.V.	PARDINAS MOLINA, ROSA MARIA QUINTANA ROO SUR 855 TOLUCA MX 50120 MEXICO	0.00	0.00	0.00	2,500.00	2,500.00 USD	No
	<b>Date Filed:</b>	1/13/2021							
76	20304	Aerovías de México, S.A. de C.V.	PARDINAS MOLINA, ROSA MARIA QUINTANA ROO SUR 855 TOLUCA MX 50120 MEXICO	0.00	0.00	0.00	1,691.50	1,691.50 USD	No
	<b>Date Filed:</b>	1/14/2021							
77	14078	Aerovías de México, S.A. de C.V.	PARIDAD EDUCATION CONSULTING 5315 N CLARK ST, #229 CHICAGO IL 60640	0.00	0.00	0.00	5,010.60	5,010.60 USD	Yes
	<b>Date Filed:</b>	1/15/2021							
78	14337	Aerovías de México, S.A. de C.V.	PARK, DOHYUN #160, GOSANJA-RO, SEONGDONG-GU, DAELIMGANGBYUN APT #102- 504 SEOUL 04747 SOUTH KOREA	0.00	0.00	0.00	783.00	783.00 USD	No
	<b>Date Filed:</b>	1/13/2021							
79	13245	Aerovías de México, S.A. de C.V.	PARK, EUNJI ***NO ADDRESS PROVIDED*** ANSAN-SI, GYEONGGI-DO 15451 SOUTH KOREA	0.00	0.00	0.00	13,155.57	13,155.57 USD	No
	<b>Date Filed:</b>	1/15/2021							
80	14589	Aerovías de México, S.A. de C.V.	PARK, HAEUN 103HO SAMHUNG VILLA 18-18, SEONGNAM-DONG, DAEJEON-SI 34589 SOUTH KOREA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	1/7/2021							
81	12004	Aerovías de México, S.A. de C.V.	PARK, JIHO 66, YEONSA-GIL, JEJU-SI, SOUTH KOREA JEJU-SI 63145 REPUBLIC OF KOREA	0.00	0.00	0.00	1,110.00	1,110.00 USD	No
	<b>Date Filed:</b>	1/13/2021							



## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
82	13242	Aerovías de México, S.A. de C.V.	PARK, JIHOON #402, 109 113, GUNPO-RO, GUNPO-SI GYEONGGI-DO 15888 SOUTH KOREA	0.00	0.00	0.00	951.57	951.57 USD	No
	<b>Date Filed:</b>	1/11/2021							
83	12795	Aerovías de México, S.A. de C.V.	PARK, JIHUN 302-1203, 40, DONGSAK 1-RO 22BEON-GIL PYEONGTAEK-SI GYEONGGI-DO 17841 REPUBLIC OF KOREA	0.00	0.00	0.00	875.00	875.00 USD	No
	<b>Date Filed:</b>	1/4/2021							
84	11650	Aerovías de México, S.A. de C.V.	PARK, JIHYE 49, YEONWON-RO, GIHEUNG- GU, YONGIN-SI 108-1402 GYEONGGI-DO 16908 SOUTH KOREA	0.00	0.00	0.00	923.66	923.66 USD	No
	<b>Date Filed:</b>	1/5/2021							
85	11729	Aerovías de México, S.A. de C.V.	PARK, JUNGYUN BLDG934 RM205, 1, GWANAK- RO, GWANAK-GU SEOUL 08826 SOUTH KOREA	0.00	0.00	0.00	2,068.44	2,068.44 USD	No
	<b>Date Filed:</b>	12/26/2020							
86	10718	Aerovías de México, S.A. de C.V.	PARK, KEONJO 99-3, EOSEONGJEON-GIL, HYEONBUK-MYEON YANGYANG-GUN 25051 SOUTH KOREA	0.00	0.00	0.00	1,199.52	1,199.52 USD	No
	<b>Date Filed:</b>	1/4/2021							
87	11573	Aerovías de México, S.A. de C.V.	PARK, NA YOUNG 103-3403, 100, GAEYANG-RO JINJU-SI, GYEONGSANGNAM-DO REPUBLIC OF KOREA JINJU-SI 52826 SOUTH KOREA	0.00	0.00	0.00	507.90	507.90 USD	No
	<b>Date Filed:</b>	1/10/2021							
88	12517	Aerovías de México, S.A. de C.V.	PARK, SHINJA YANGCHEON-GU NAMBUSUNHWAN-RO 33-GIL 9, CHELSEAHOUSE NA302 SEOUL 07904 SOUTH KOREA	0.00	0.00	0.00	663.60	663.60 USD	No
	<b>Date Filed:</b>	2/5/2021							
89	700	Aerovías de México, S.A. de C.V.	PEREZ, ESTEFANNI NABOR C/O LUCERO GONZALEZ 1697 ADAMS AVE, SPC 21 EL CENTRO CA 92243	0.00	0.00	0.00	787.90	787.90 USD	No
	<b>Date Filed:</b>	12/11/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
90	10401	Aerovías de México, S.A. de C.V.	PETERS, VIKTOR HAMELNER STR. 39 GERMANY BIELEFELD DE 33699	0.00	0.00	0.00	2,343.73	2,343.73 USD	No
	<b>Date Filed:</b>	12/12/2020							
91	10422	Aerovías de México, S.A. de C.V.	PEWTON, BENJAMIN DOUGLAS 4 HYDE FARM BARN THE HYDE KINVER STOURBRIDGE, WM DY76LS UNITED KINGDOM	0.00	0.00	0.00	589.32	589.32 USD	No
	<b>Date Filed:</b>	1/19/2021							
92	14721	Aerovías de México, S.A. de C.V.	PICASSO TRAVEL 65 W 36TH ST, STE 302 NEW YORK NY 10018	0.00	0.00	0.00	1,981.95	1,981.95 USD	No
	<b>Date Filed:</b>	1/15/2021							
93	20409	Aerovías de México, S.A. de C.V.	PICOS, LAURA MUÑOZ CALLE ALAMO, 4. VILLANUEVA DE LA CAÑADA MADRID 28691 SPAIN	0.00	0.00	0.00	1,343.84	1,343.84 USD	No
	<b>Date Filed:</b>	12/30/2020							
94	11168	Aerovías de México, S.A. de C.V.	PIETRANTONI, ALAIN 37 RUE DES TROIS PONTS FABREGUES 34690 FRANCE	0.00	0.00	0.00	1,294.04	1,294.04 USD	No
	<b>Date Filed:</b>	12/30/2020							
95	11167	Aerovías de México, S.A. de C.V.	PIETRANTONI, OLIVIER 96 RUE DU JURA BATIMENT B APPARTEMENT 1 DIVONNE LES BAINS 01220 FRANCE	0.00	0.00	0.00	1,294.04	1,294.04 USD	No
	<b>Date Filed:</b>	1/16/2021							
96	20488	Aerovías de México, S.A. de C.V.	PONGUTA, YENNY ALEJANDRA CRUZ K 100 65-46 SUR INTERIOR 2 CASA 37 BOGOTA CU 110111 COLOMBIA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	1/6/2021							
97	11943	Aerovías de México, S.A. de C.V.	PRESTES, TAYANNE QUEVEDO 12418 COLT CT MAGNOLIA TX 77354	0.00	0.00	703.55	0.00	703.55 USD	Yes
	<b>Date Filed:</b>	1/14/2021							
98	14019	Aerovías de México, S.A. de C.V.	PROULX, RICHARD 1570 AVE CHAMPFLEURY QUEBEC QC G1J 4L8 CANADA	0.00	0.00	0.00	1,543.00	1,543.00 USD	No
	<b>Date Filed:</b>	1/15/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
99	14648	Aerovías de México, S.A. de C.V.	PUGGE, CHRISTOPH C/O BRIDGEHOUSELAW LLP ATTN MADELINE PERSON 112 S TRYON ST, STE 1100 CHARLOTTE NC 28284	0.00	0.00	0.00	2,631.60	2,631.60 USD	Yes
	<b>Date Filed:</b>	1/14/2021							
100	13730	Aerovías de México, S.A. de C.V.	RAATH, LEON 182 NEGESTER BOULEVARD POSBUS 1819 BELA BELA ZA 0480 SOUTH AFRICA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/15/2020							
101	10488	Aerovías de México, S.A. de C.V.	RAHEMTULLA, NEENA 1404 1199 SEYMOUR ST VANCOUVER BC V6B 1K3 CANADA	0.00	0.00	0.00	1,135.46	1,135.46 USD	No
	<b>Date Filed:</b>	12/15/2020							
102	10487	Aerovías de México, S.A. de C.V.	RAMIREZ, HUGO ENRIQUE 24815 ACROPOLIS DR MISSION VIEJO CA 92691	0.00	0.00	0.00	728.00	728.00 USD	No
	<b>Date Filed:</b>	1/15/2021							
103	14638	Aerovías de México, S.A. de C.V.	REED, LAUREN TERESE 12750 NICOLLET AVE, STE 210 BURNSVILLE MN 55337	0.00	0.00	0.00	2,539.15	2,539.15 USD	No
	<b>Date Filed:</b>	12/24/2020							
104	10663	Aerovías de México, S.A. de C.V.	RICARD, CHRIS 506 FAIRWAY DR NORTH VANCOUVER BC V7G 1L6 CANADA	0.00	0.00	0.00	879.81	879.81 USD	No
	<b>Date Filed:</b>	1/16/2021							
105	20487	Aerovías de México, S.A. de C.V.	RODRIGUEZ, RAFAELA MEDRANO NEBULA 11A, COLONIA LAGO ESMERALDA CONDOMINIO AQUA 1 ATIZAPAN DE ZARAGOZA MX 52989 MEXICO	0.00	0.00	0.00	793.70	793.70 USD	No
	<b>Date Filed:</b>	1/12/2021							
106	13035	Aerovías de México, S.A. de C.V.	ROMAN, JOSE LUIS FURNTE 714 W OLYMPIC BLVD, STE 450 LOS ANGELES CA 90015	0.00	0.00	0.00	524.57	524.57 USD	Yes
	<b>Date Filed:</b>	1/11/2021							
107	12776	Aerovías de México, S.A. de C.V.	ROSALES, TALIA 27 W 15TH AVE VANCOUVER BC V5Y 1X7 CANADA	0.00	0.00	0.00	1,120.24	1,120.24 USD	No
	<b>Date Filed:</b>	1/4/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
108	11630	Aerovías de México, S.A. de C.V.	RUIZ, WENDY 8137 SIERRA WOOD LN CARPENTERSVILLE IL 60110	0.00	0.00	0.00	420.67	420.67 USD	No
	<b>Date Filed:</b>	12/28/2020							
109	10914	Aerovías de México, S.A. de C.V.	RYU, SUNJIN MAPO-GU, BAEKBUM-RO 199 #811 SEOUL 04195 SOUTH KOREA	0.00	0.00	0.00	630.00	630.00 USD	No
	<b>Date Filed:</b>	1/4/2021							
110	20166	Aerovías de México, S.A. de C.V.	SANCHEZ, ANA MARIA GONZALEZ C/O INES SANCHEZ LOZANO CALLE PINTOR VELA SILLER, N.26 CIUDAD REAL 13005 SPAIN	0.00	0.00	0.00	358.00	358.00 USD	No
	<b>Date Filed:</b>	1/13/2021							
111	13348	Aerovías de México, S.A. de C.V.	SANTIAGO, PIERI C/O IL BORGO NUOVO VIA ILARIA ALPI SNC SCARPERIA E SAN PIERO FI 50038 ITALY	0.00	0.00	0.00	1,544.23	1,544.23 USD	Yes
	<b>Date Filed:</b>	1/16/2021							
112	14693	Aerovías de México, S.A. de C.V.	SAUCEDO, CRYSTAL NICOLE 311 N 84TH ST SEATTLE WA 98103	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	1/4/2021							
113	11606	Aerovías de México, S.A. de C.V.	SAUVEUR, SANDRINE DE SAINT 173 BOULEVARD PEREIRE PARIS, 75017 FRANCE	0.00	0.00	0.00	13,817.58	13,817.58 USD	No
	<b>Date Filed:</b>	1/11/2021							
114	12748	Aerovías de México, S.A. de C.V.	SCHULZE, STEPHAN C/O FORD MOTOR COMPANY 15504 LOBDELL RD LINDEN MI 48451	0.00	0.00	0.00	101.11	101.11 USD	No
	<b>Date Filed:</b>	1/12/2021							
115	13038	Aerovías de México, S.A. de C.V.	SEGGEL, RICHARD FREDERICK 705 PEARSON POINT PL ANNAPOLIS MD 21401	0.00	0.00	0.00	817.84	817.84 USD	No
	<b>Date Filed:</b>	1/10/2021							
116	12354	Aerovías de México, S.A. de C.V.	SEJOONG 4-6F, 143, CHANGGYEONGGUNG-RO, JONGNO-GU SEOUL, 03136 REPUBLIC OF KOREA	0.00	0.00	0.00	905.58	905.58 USD	No
	<b>Date Filed:</b>	12/30/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
117	11111	Aerovías de México, S.A. de C.V.	SEO, JIYEONG 22, INHYEONJUNGANG-GIL DANWON-GU ANSAN-SI, GYEONGGI-DO 15345 SOUTH KOREA	0.00	0.00	0.00	1,040.12	1,040.12 USD	No
	<b>Date Filed:</b>	1/13/2021							
118	13312	Aerovías de México, S.A. de C.V.	SEO, YOUNGAE 30, HEUNGDEOK 2-RO 118BEON- GIL GIHEUNG-GU, YONGIN-SI GYEONGGI-DO, REPUBLIC OF KOREA YONGIN-SI 16951 REPUBLIC OF KOREA	0.00	0.00	0.00	2,945.26	2,945.26 USD	No
	<b>Date Filed:</b>	1/12/2021							
119	12862	Aerovías de México, S.A. de C.V.	SEOK, NAWOOM 106-1008, 57, TONGIL-RO 39GA- GIL, SEODAEMUN-GU SEOUL 03638 REPUBLIC OF KOREA	0.00	0.00	0.00	822.76	822.76 USD	No
	<b>Date Filed:</b>	12/30/2020							
120	11113	Aerovías de México, S.A. de C.V.	SEOUL MUSEUM OF ART 61 DEOKSUGUNG-GIL, JUNG-GU SEOUL 04515 SOUTH KOREA	0.00	0.00	0.00	1,672.83	1,672.83 USD	No
	<b>Date Filed:</b>	1/15/2021							
121	20468	Aerovías de México, S.A. de C.V.	SEPULVEDA, ENID MABEL GONZALEZ MONTE ALBAN #105 SALAMANCA 36730 MEXICO	0.00	0.00	0.00	745.37	745.37 USD	No
	<b>Date Filed:</b>	1/12/2021							
122	274	Aerovías de México, S.A. de C.V.	SHEBELSKI, JAMES P 1883 SUNNY CT MOSINEE WI 54455	0.00	0.00	0.00	3,141.04	3,141.04 USD	No
	<b>Date Filed:</b>	12/18/2020							
123	10543	Aerovías de México, S.A. de C.V.	SHEFFEL, REBECCA ANNE 910 W IOWA AVE SUNNYVALE CA 94086	0.00	0.00	0.00	472.00	472.00 USD	Yes
	<b>Date Filed:</b>	1/4/2021							
124	11626	Aerovías de México, S.A. de C.V.	SHEN, DIANA 40-16 23 AVE, 2ND FL ASTORIA NY 11105	0.00	0.00	0.00	680.62	680.62 USD	No
	<b>Date Filed:</b>	12/16/2020							
125	10508	Aerovías de México, S.A. de C.V.	SHIKIDA, AKIRA DAISHOJI NAGAMACHI 107 ISHIKAWA-KEN KAGA-SHI 9220024 JAPAN	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/24/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
126	10656	Aerovías de México, S.A. de C.V.	SHIN, EUNCHUL 500-6, HEUNGAN-DAERO, DONGAN-GU ANYANG-SI 13943 SOUTH KOREA	0.00	0.00	0.00	847.94	847.94 USD	No
	<b>Date Filed:</b>	12/28/2020							
127	10938	Aerovías de México, S.A. de C.V.	SHIN, HAEYEONG 123-2603, 160, LANDMARK-RO, YEONSU-GU INCHEON-SI 22017 SOUTH KOREA	0.00	0.00	0.00	1,837.66	1,837.66 USD	No
	<b>Date Filed:</b>	1/5/2021							
128	11694	Aerovías de México, S.A. de C.V.	SHIN, HYE MIN 53, SOSA 3-RO, PYEONGTAEK, GYEONGGI-DO PYEONGTAEK 17877 SOUTH KOREA	0.00	0.00	0.00	920.71	920.71 USD	No
	<b>Date Filed:</b>	12/27/2020							
129	10745	Aerovías de México, S.A. de C.V.	SHIN, HYE YEONG 123-2603, 160, LANDMARK-RO, YEONSU-GU INCHEON-SI 22017 SOUTH KOREA	0.00	0.00	0.00	1,837.66	1,837.66 USD	No
	<b>Date Filed:</b>	12/28/2020							
130	10813	Aerovías de México, S.A. de C.V.	SHIN, MIN CHOUL 179-36 DONGGYO-DONG, MAPO- GU 401 SEOUL 04056 SOUTH KOREA	0.00	0.00	0.00	1,305.44	1,305.44 USD	No
	<b>Date Filed:</b>	1/1/2021							
131	20160	Aerovías de México, S.A. de C.V.	SILVIA ELIZABETH PAZ ALDANA DE MORALES 0 CALLE 12-71 RESIDENCIALES EL ROCONAL ZONA 1 DE MIXCO GUATEMALA 01057 GUATEMALA	0.00	0.00	0.00	803.46	803.46 USD	No
	<b>Date Filed:</b>	1/10/2021							
132	12450	Aerovías de México, S.A. de C.V.	SIMONIN, ELISE 33 RUE JACQUES HILLAIRET PARIS, 75012 FRANCE	0.00	0.00	0.00	866.14	866.14 USD	No
	<b>Date Filed:</b>	1/14/2021							
133	13912	Aerovías de México, S.A. de C.V.	SIMONS, GUUS PATER DE LEEUWSTRAAT 47 5741EE BEEK EN DONK NEDERLAND BEEK EN DONK 574 1EE THE NETHERLANDS	0.00	0.00	0.00	647.67	647.67 USD	No
	<b>Date Filed:</b>	1/14/2021							
134	14050	Aerovías de México, S.A. de C.V.	SOBOLL, JODI 2176 FELL ST SAN FRANCISCO CA 94117	0.00	0.00	0.00	1,282.18	1,282.18 USD	No
	<b>Date Filed:</b>	1/12/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
135	13106	Aerovías de México, S.A. de C.V.	SOJITZ TOURIST CORPORATION IINO BLDG 7F 2-1-1, UCHISAIWAI-CHO CHIYODA-KU TOKYO 1008691 JAPAN	0.00	0.00	0.00	5,047.00	5,047.00 USD	No
	<b>Date Filed:</b>	1/5/2021							
136	11677	Aerovías de México, S.A. de C.V.	SON, DONGNYEONG 138, AJUNG-RO, DEOKJIN-GU #301 JEONJU-SI 55030 SOUTH KOREA	0.00	0.00	0.00	521.74	521.74 USD	No
	<b>Date Filed:</b>	1/3/2021							
137	11395	Aerovías de México, S.A. de C.V.	SONG, JONGHA 502 HO 104 DONG 9, SINCHON I-RO PYEONGTAEK-SI 17726 REPUBLIC OF KOREA	0.00	0.00	0.00	1,325.09	1,325.09 USD	No
	<b>Date Filed:</b>	1/4/2021							
138	11530	Aerovías de México, S.A. de C.V.	SONG, SUKMIN 208-201 DONGYANG APT, 198 HAAN-RO GWANGMYEONG-SI 14313 SOUTH KOREA	0.00	0.00	0.00	978.68	978.68 USD	No
	<b>Date Filed:</b>	12/21/2020							
139	10580	Aerovías de México, S.A. de C.V.	SPIEKERMAN, EMMA K 112 N CROFT AVE, APT 7 LOS ANGELES CA 90048	0.00	0.00	0.00	791.29	791.29 USD	No
	<b>Date Filed:</b>	1/3/2021							
140	11440	Aerovías de México, S.A. de C.V.	STEENDAM, JULIE ZUIDSTATIONSTRAAT 4 GENT, 9000 BELGIUM	0.00	0.00	0.00	235.28	235.28 USD	Yes
	<b>Date Filed:</b>	1/15/2021							
141	20459	Aerovías de México, S.A. de C.V.	SUCHOWIECKY, SAMUEL 5135 BASCULE AVE WOODLAND HILLS CA 91364	0.00	0.00	446.44	0.00	446.44 USD	No
	<b>Date Filed:</b>	1/15/2021							
142	20465	Aerovías de México, S.A. de C.V.	SUCHOWIECKY, SAMUEL 5135 BASCULE AVE WOODLAND HILLS CA 91364	0.00	0.00	0.00	54,000.00	54,000.00 Unknown	No
	<b>Date Filed:</b>	1/5/2021							
143	11812	Aerovías de México, S.A. de C.V.	SUGIMACHI, NOHA COLIMA 1027 COL.LAS GARZAS LA PAZ BCS, 23079 MEXICO	0.00	0.00	0.00	1,583.85	1,583.85 USD	No
	<b>Date Filed:</b>	1/4/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
144	11586	Aerovías de México, S.A. de C.V.	SUH, SONGYI 458-605 81, DONGTANSUNHWAN-DAERO 26-GIL HWASEONG-SI GYEONGGI-DO, REPUBLIC OF KOREA HWASEONG-SI 18466 SOUTH KOREA	0.00	0.00	0.00	939.00	939.00 USD	No
	<b>Date Filed:</b>	8/16/2020							
145	10160	Aerovías de México, S.A. de C.V.	SZEP, DAVIDE 4220 24TH ST, APT 30F LONG ISLAND CITY NY 11101	0.00	0.00	0.00	700.35	700.35 USD	Yes
	<b>Date Filed:</b>	1/5/2021							
146	240	Aerovías de México, S.A. de C.V.	SZYMANSKA, KAROLINA DOBRA 64A DOBRA, DOBROSZYCE 56-410 POLAND	0.00	0.00	0.00	415.81	415.81 USD	No
	<b>Date Filed:</b>	1/11/2021							
147	12676	Aerovías de México, S.A. de C.V.	TABBAL, LINA AL 208 RUE PORTE SAINT JEAN MONTREUIL BELLAY 49260 FRANCE	0.00	0.00	0.00	3,324.93	3,324.93 USD	No
	<b>Date Filed:</b>	1/8/2021							
148	12181	Aerovías de México, S.A. de C.V.	TAKEDA, HIRONARI 6-3-2 HINODE URAYASU, CHIBA 2790013 JAPAN	0.00	0.00	0.00	540.00	540.00 USD	No
	<b>Date Filed:</b>	1/15/2021							
149	14442	Aerovías de México, S.A. de C.V.	TAKEDA, MAYUMI 6 3 2 HINODE URAYASU CHIBA 279-0000 JAPAN	0.00	0.00	0.00	2,066.00	2,066.00 USD	No
	<b>Date Filed:</b>	1/5/2021							
150	20175	Aerovías de México, S.A. de C.V.	TAMARGO, ANA ISABEL CALLE DE BRETON DE LOS HERREROS, 7 6D MADRID 28003 SPAIN	0.00	0.00	0.00	684.00	684.00 USD	Yes
	<b>Date Filed:</b>	12/22/2020							
151	10617	Aerovías de México, S.A. de C.V.	THAKUR, NITIN 9 MOTEN ST CAMPBELL CANBERRA, AC 2612 AUSTRALIA	0.00	0.00	0.00	1,800.00	1,800.00 USD	No
	<b>Date Filed:</b>	12/28/2020							
152	10900	Aerovías de México, S.A. de C.V.	THRION, PIETER-JAN HUIGEVELDSTRAAT 48 HERZELE, 9550 BELGIUM	0.00	0.00	0.00	289.94	289.94 USD	No
	<b>Date Filed:</b>	1/18/2021							



## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
153	14707	Aerovías de México, S.A. de C.V.	TIME TOURS 249 RUE DE CRIMEE PARIS 755019 FRANCE	0.00	0.00	0.00	2,531.00	2,531.00 USD	No
	<b>Date Filed:</b>	1/13/2021							
154	13464	Aerovías de México, S.A. de C.V.	TONDELLIER LOU ALAIN DANIEL FIRMIN 4125 AVE DE L'ESPLANADE, APT 2 MONTREAL QC H2W 1S9 CANADA	0.00	0.00	0.00	279.71	279.71 USD	No
	<b>Date Filed:</b>	1/14/2021							
155	14177	Aerovías de México, S.A. de C.V.	TORRES, DEIRA ELENA GARCES 56 RENAISSANCE BLVD SOMERSET NJ 08873	0.00	0.00	0.00	1,071.15	1,071.15 USD	No
	<b>Date Filed:</b>	2/3/2021							
156	20510	Aerovías de México, S.A. de C.V.	TORRES, GUILLERMO VILLARREAL PROLONGACION PASEO DE LA REFORMA 115 COL PASEO DE LAS LOMAS CIUDAD DE MÉXICO 01330 MÉXICO	0.00	0.00	0.00	3,084.59	3,084.59 USD	No
	<b>Date Filed:</b>	1/25/2021							
157	679	Aerovías de México, S.A. de C.V.	TORRES, ROSA VICTORIA MORE SHIHODEN 14-1 SHI HODEN JUTAKU 1A-10 HONJO, SAITAMA-KEN 367-0034 JAPAN	0.00	0.00	0.00	640.00	640.00 USD	No
	<b>Date Filed:</b>	12/29/2020							
158	11092	Aerovías de México, S.A. de C.V.	TOUR, HANA 41, INSA DONG 5-GIL, JONGNO- GU SEOUL 03161 SOUTH KOREA	0.00	0.00	0.00	1,858.00	1,858.00 USD	No
	<b>Date Filed:</b>	1/15/2021							
159	14524	Aerovías de México, S.A. de C.V.	TROTTIER, ALICE B 58 RUE DE LA PL COUTURE LÉVIS QC G6J0J4 CANADA	0.00	0.00	0.00	570.56	570.56 USD	No
	<b>Date Filed:</b>	12/16/2020							
160	10503	Aerovías de México, S.A. de C.V.	TRUONG, THAO 733 CHENERY ST SAN FRANCISCO CA 94131	0.00	0.00	0.00	647.90	647.90 USD	No
	<b>Date Filed:</b>	1/15/2021							
161	14536	Aerovías de México, S.A. de C.V.	TYSDAL, CANDACE 4011 - 3F CALLE SONORA OESTE LAGUNA WOODS CA 92637	0.00	0.00	494.75	0.00	494.75 USD	No
	<b>Date Filed:</b>	12/12/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
162	10407	Aerovías de México, S.A. de C.V.	VALDEZ, ZULEYMA 149 MARTINEZ PLACE SOLEDAD CA 93960	0.00	0.00	0.00	753.74	753.74 USD	No
	<b>Date Filed:</b>	12/11/2020							
163	20100	Aerovías de México, S.A. de C.V.	VALENCIA, VANESSA ADRIANA PEREZ AVENIDA SAN JERONIMO 945 CIUDAD DE MEXICO 10200 MEXICO	0.00	0.00	0.00	1,640.07	1,640.07 USD	No
	<b>Date Filed:</b>	1/11/2021							
164	20227	Aerovías de México, S.A. de C.V.	VALENCIA, YONATAN CALLE 32 # 47 - 43 APT 301 ITAGUI 055413 COLOMBIA	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	12/18/2020							
165	20128	Aerovías de México, S.A. de C.V.	VARGAS, ARACELI ESCOBAR 17304 CROSS WINDS RD LIVONIA MI 48152	0.00	0.00	0.00	1,681.64	1,681.64 USD	No
	<b>Date Filed:</b>	1/8/2021							
166	12189	Aerovías de México, S.A. de C.V.	VENTURA, BROOKE 27 LOCKS RD BRANTFORD ON N3S 6Z1 CANADA	0.00	0.00	0.00	967.28	967.28 USD	No
	<b>Date Filed:</b>	1/4/2021							
167	11572	Aerovías de México, S.A. de C.V.	VIA LIPPKE FEHRBELLINER STR 31 MITTE BERLIN 10119 GERMANY	0.00	0.00	0.00	1,357.42	1,357.42 USD	Yes
	<b>Date Filed:</b>	1/22/2021							
168	20496	Aerovías de México, S.A. de C.V.	VIAJES AMAIA SA DOSCTOR CASTELO 15 - LOCAL MADRID 28009 SPAIN	0.00	0.00	0.00	719.88	719.88 USD	No
	<b>Date Filed:</b>	1/15/2021							
169	20448	Aerovías de México, S.A. de C.V.	VIAJES EJECUTIVOS MUNDIALES SA AV CENTRAL Y SEGUNDA CALLE 34 EDIF VEMSA SAN JOSE, SJ 668-1005 COSTA RICA	0.00	0.00	0.00	1,929.92	1,929.92 USD	Yes
	<b>Date Filed:</b>	1/11/2021							
170	20222	Aerovías de México, S.A. de C.V.	VIAJES PRESSTOUR ESPANA SA CALLE AYALA 83 MADRID 28006 SPAIN	0.00	0.00	0.00	6,480.26	6,480.26 USD	No
	<b>Date Filed:</b>	1/15/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
171	20434	Aerovías de México, S.A. de C.V.	VIAJES S S SRL CALLE RAMON PERALTA G26 LOS JARDINES METROPOLITANOS SANTIAGO 55105 DOMINICAN REPUBLIC	0.00	0.00	0.00	3,300.00	3,300.00 USD	Yes
	<b>Date Filed:</b>	1/13/2021							
172	13391	Aerovías de México, S.A. de C.V.	VILLALOBOS, GERARDO MANUEL TRUYOL MARTIN DE VARGAS 17 ESQ IZQ, 6TO F MADRID, MA 28005 SPAIN	0.00	0.00	0.00	817.29	817.29 USD	No
	<b>Date Filed:</b>	1/16/2021							
173	14697	Aerovías de México, S.A. de C.V.	VOUTYRAS, SAVVAS FLAT 18 EDMONDSHAM HOUSE TERRACE ROAD BOURNEMOUTH BH2 5NJ UNITED KINGDOM	0.00	0.00	0.00	1,194.12	1,194.12 USD	No
	<b>Date Filed:</b>	1/12/2021							
174	20232	Aerovías de México, S.A. de C.V.	VOYAGES TAKE OFF 4 RUE D ALESIA PARIS 75014 FRANCE	0.00	0.00	0.00	588.47	588.47 USD	No
	<b>Date Filed:</b>	12/31/2020							
175	211	Aerovías de México, S.A. de C.V.	VRAKKING, DEWIJUDITH 1311 KM 35 THE NETHERLANDS	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	1/8/2021							
176	12172	Aerovías de México, S.A. de C.V.	WALLEY, BRIAN A 3702 MARINE AVE BELCARRA BC V3H 4R8 CANADA	0.00	0.00	0.00	587.36	587.36 USD	No
	<b>Date Filed:</b>	12/11/2020							
177	10376	Aerovías de México, S.A. de C.V.	WEYRICH, MARIUS IM KIRSCHENPFAD 10 SAINT WENDEL, 66606 GERMANY	0.00	0.00	0.00	0.00	0.00 USD	Yes
	<b>Date Filed:</b>	1/14/2021							
178	14248	Aerovías de México, S.A. de C.V.	WHARF, JOSHUA 12543 CAMINITO VISTA SOLEDAD SAN DIEGO CA 92130	0.00	0.00	0.00	480.58	480.58 USD	No
	<b>Date Filed:</b>	1/10/2021							
179	12520	Aerovías de México, S.A. de C.V.	WHITE, RICHARD 1195 RANCHEROS RD PASADENA CA 91103	0.00	0.00	0.00	1,058.08	1,058.08 USD	No
	<b>Date Filed:</b>	12/14/2020							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
180	10455	Aerovías de México, S.A. de C.V.	WIEBE, NATHAN 4110 MOUNTAIN HIGHWAY NORTH VANCOUVER BC V7K 2J8 CANADA	0.00	0.00	0.00	812.57	812.57 USD	No
	<b>Date Filed:</b>	1/14/2021							
181	14226	Aerovías de México, S.A. de C.V.	WINSTON, TYLER 706 NEPTUNE AVE ENCINITAS CA 92024	0.00	0.00	0.00	481.58	481.58 USD	No
	<b>Date Filed:</b>	4/14/2021							
182	14850	Grupo Aeroméxico, S.A.B. de C.V.	WLTT SA 40 RUE DE L'ALZETTE ESCH-SUR-ALZETTE 4010 LUXEMBOURG	12,393.22	12,393.22	12,393.22	0.00	12,393.22 USD	No
	<b>Date Filed:</b>	12/20/2020							
183	10575	Aerovías de México, S.A. de C.V.	WONG, SALLY 7139 ADERA ST VANCOUVER BC V6P 5C5 CANADA	0.00	0.00	0.00	721.71	721.71 USD	No
	<b>Date Filed:</b>	1/5/2021							
184	20178	Aerovías de México, S.A. de C.V.	YAKABI MIGUITA, GERMAN PAUL 7401-9 RYUGASAKI SHI 301-0000 JAPAN	0.00	0.00	0.00	1,306.68	1,306.68 USD	No
	<b>Date Filed:</b>	1/13/2021							
185	13203	Aerovías de México, S.A. de C.V.	YANG, HYEIN IDONG-EUP, CHEOIN-GU, YONGIN-S 18-5, BAEGOK-DAERO 624BEON- GIL GYEONGGI-DO 17128 SOUTH KOREA	0.00	0.00	0.00	916.72	916.72 USD	No
	<b>Date Filed:</b>	1/8/2021							
186	12202	Aerovías de México, S.A. de C.V.	YANG, SEONGJU 22 SOSA 3-RO PYEONGTAEK-SI 17877 REPUBLIC OF KOREA	0.00	0.00	0.00	1,192.70	1,192.70 USD	No
	<b>Date Filed:</b>	1/11/2021							
187	12692	Aerovías de México, S.A. de C.V.	YEON, KYUSEUNG 107-405, SERU-RO 60, GWEONSUN-GU SUWON-SI 16459 SOUTH KOREA	0.00	0.00	0.00	1,083.62	1,083.62 USD	No
	<b>Date Filed:</b>	1/14/2021							
188	20338	Aerovías de México, S.A. de C.V.	YERBA DEL MORAL, CARMEN CALLE ANGEL GUIMERA 3-7, 2º4º BARCELONA 08690 SPAIN	0.00	0.00	0.00	1,821.29	1,821.29 USD	Yes
	<b>Date Filed:</b>	1/3/2021							

## Satisfied Claims

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
189	11396	Aerovías de México, S.A. de C.V.	YI, DA SOM 502 HO 104 DONG 9, SINCHON I-RO PYEONGTAEK-SI 17726 REPUBLIC OF KOREA	0.00	0.00	0.00	1,325.09	1,325.09 USD	No
	<b>Date Filed:</b>	1/14/2021							
190	14212	Aerovías de México, S.A. de C.V.	YOO, CHULHO 58 BROADPATH RD TORONTO ON M3C 2B5 CANADA	0.00	0.00	0.00	2,886.80	2,886.80 USD	No
	<b>Date Filed:</b>	12/26/2020							
191	10690	Aerovías de México, S.A. de C.V.	YOO, HEYYEON 2 FLOOR, SEOCKJUNGRO 140-32, MICHUHOL-GU INCHEON-SI 22103 SOUTH KOREA	0.00	0.00	0.00	1,490.80	1,490.80 USD	Yes
	<b>Date Filed:</b>	12/27/2020							
192	10763	Aerovías de México, S.A. de C.V.	YOO, MIRAN 109-1503, 73, BEOTKKOT-RO GEUMCHEON-GU SEOUL, 08596 SOUTH KOREA	0.00	0.00	0.00	813.79	813.79 USD	No
	<b>Date Filed:</b>	1/10/2021							
193	12432	Aerovías de México, S.A. de C.V.	YOON, SOYOUNG 202 23-1, NONHYEON-RO 75-GIL, GANGNAM-GU SEOUL 06246 SOUTH KOREA	0.00	0.00	0.00	1,000.37	1,000.37 USD	No
	<b>Date Filed:</b>	1/15/2021							
194	14294	Aerovías de México, S.A. de C.V.	YOU, SEULGI 26-423, GANGSEOGU SEOUL 07773 SOUTH KOREA	0.00	0.00	0.00	10.76	10.76 USD	No
	<b>Date Filed:</b>	1/6/2021							
195	11853	Aerovías de México, S.A. de C.V.	YUN, JAEKYUNG 113-506, SUJEONG-RO 319, SUJEONG-GU SEONGNAM-SI 13260 SOUTH KOREA	0.00	0.00	0.00	920.66	920.66 USD	No
	<b>Date Filed:</b>	1/15/2021							
196	14278	Aerovías de México, S.A. de C.V.	YUN, JONGHYUN 26-423, GANGSEOGU SEOUL 07773 SOUTH KOREA	0.00	0.00	0.00	10.76	10.76 USD	No
	<b>Date Filed:</b>	1/10/2021							
197	12431	Aerovías de México, S.A. de C.V.	YUN, SANGHYUN 202 23-1, NONHYEON-RO 75-GIL, GANGNAM-GU SEOUL 06246 SOUTH KOREA	0.00	0.00	0.00	1,000.37	1,000.37 USD	No
	<b>Date Filed:</b>	1/15/2021							

**Satisfied Claims**

Ref	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total	Unliquidated
198	14559	Aerovías de México, S.A. de C.V.	ZGALJARDIC, JHONNY 390 MAPLEWOOD RD HUNTINGTON STATION NY 11746	0.00	0.00	0.00	2,311.88	2,311.88 USD	No
	<b>Date Filed:</b>	12/12/2020							
199	10406	Aerovías de México, S.A. de C.V.	ZHANG, JING 6237 ADOBE CIR S IRVINE CA 92617	0.00	0.00	0.00	417.00	417.00 USD	No
	<b>Date Filed:</b>	1/14/2021							
200	13804	Aerovías de México, S.A. de C.V.	ZUBIZARRETA, PELLO LOPE DE IRIGOYEN KALEA, 31, 4B IRUN 20301 SPAIN	0.00	0.00	0.00	436.22	436.22 USD	No
	<b>Date Filed:</b>								
<b>Satisfied Claim Totals</b>		<b>Count: 199</b>	<b>USD</b>	<b>12,393.22</b>	<b>12,393.22</b>	<b>21,714.12</b>	<b>269,647.07</b>	<b>291,361.19</b>	
		<b>Count: 1</b>	<b>Unknown</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>54,000.00</b>	<b>54,000.00</b>	

**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.<sup>1</sup>**

**Chapter 11**

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

**(Jointly Administered)**

**DECLARATION OF RICARDO JAVIER SÁNCHEZ BAKER  
IN SUPPORT OF THE DEBTORS' TWENTY-SECOND 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

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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; 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' Twenty-Second 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 Records<sup>2</sup> 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

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<sup>2</sup> 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 the Satisfied Claims have been paid or otherwise satisfied. If the Satisfied Claims identified on Schedule 1 are not disallowed and expunged, the claimants 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**

7. 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.

8. 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: October 4, 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.<sup>1</sup>**

**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**”)<sup>2</sup> is

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<sup>1</sup> 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.

<sup>2</sup> 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,<sup>3</sup> 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.

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<sup>3</sup> 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.