Leslie C. Heilman, Esq. Laurel D. Roglen, Esq. BALLARD SPAHR LLP 919 N. Market Street, 11th Floor Wilmington, DE 19801 Telephone: (302) 252-4465

Facsimile: (302) 252-4466

Counsel to Aero Miami II. LLC

Lindsey Zionts, Esq. BALLARD SPAHR LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103-7599 Telephone: (215) 665-8500 Facsimile: (215) 864-8999

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re	) Chapter 11
Avianca Holdings S.A., et al.,	) Case No. 20-11133 (MG)
Debtors.	) (Jointly Administered)

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

PLEASE TAKE NOTICE that Ballard Spahr LLP ("Ballard Spahr") hereby appears in the above-captioned cases as counsel to Aero Miami II, LLC. Ballard Spahr enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and requests pursuant to Rules 2002(i), 9007 and 9010 (b) of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"), and requests copies of all notices given or required to be given, and all papers served or required to be served in this case, be given to and served upon the following:

> Leslie C. Heilman, Esquire Laurel D. Roglen, Esquire BALLARD SPAHR LLP 919 N. Market Street, 11th Floor Wilmington, DE 19801 Telephone: (302) 252-4465 Facsimile: (302) 252-4466 heilmanl@ballardspahr.com

roglenl@ballardspahr.com



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and

Lindsey Zionts, Esquire BALLARD SPAHR LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103-7599

Telephone: (215) 665-8500 Facsimile: (215) 864-8999 ziontsl@ballardspahr.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, all orders and notices of any application, motion, order, petition, pleading, request, complaint, or demand, statement of affairs, operating report, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile transmission, or otherwise, that affects the debtor, property of the debtor, or property of the estate.

PLEASE TAKE FURTHER NOTICE that the foregoing attorneys for Ballard Spahr LLP consent to e-mail service.

**PLEASE TAKE FURTHER NOTICE** that request is also made that the attorneys identified herein be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in this case.

PLEASE TAKE FURTHER NOTICE that this entry of appearance shall not be deemed or construed to be a waiver of rights of Aero Miami II, LLC (i) to have final orders in noncore matters entered only after de-novo review by a district judge; (ii) to trial by jury in any proceeding so triable in this case, or in any case, controversy, or proceeding related to this case; (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) to assert or exercise any other rights, claims, actions, defenses, setoffs, or recoupments to which Aero Miami II, LLC

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is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: July 3, 2020 /s/ Laurel D. Roglen

Leslie C. Heilman Laurel D. Roglen BALLARD SPAHR LLP 919 N. Market Street, 11th Floor Wilmington, DE 19801

Telephone: (302) 252-4465 Facsimile: (302) 252-4466

E-mail: heilmanl@ballardapahr.com roglenl@ballardspahr.com

and

Lindsey Zionts, Esquire BALLARD SPAHR LLP 1735 Market Street, 51st Floor Philadelphia, PA 19103-7599 Telephone: (215) 665-8500

Facsimile: (215) 864-8999

E-mail: ziontsl@ballardspahr.com

Counsel for Aero Miami II, LLC

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## **CERTIFICATE OF SERVICE**

I, Laurel D. Roglen, hereby certify that, on this 3<sup>rd</sup> day of July, 2020, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* to be served via CM/ECF notice upon all parties who have appeared and requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

/s/ Laurel D. Roglen
Laurel D. Roglen

BALLARD SPAHR LLP