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

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	:	Chapter 11
In re: AVIANCA HOLDINGS S.A., <u>et al.</u> ,	:	
	:	Case No. 20-11133 (MG)
Debtors. <sup>1</sup>	:	
-----X	:	(Jointly Administered)
	:	
AVIANCA HOLDINGS S.A., AEROVÍAS DEL	:	
CONTINENTE AMERICANO S.A. AVIANCA,	:	Adv. Proc. No. 20-01244 (MG)
TACA, INTERNATIONAL AIRLINES, S.A.,	:	
AVIANCA COSTA RICA S.A., and TRANS	:	<b>NOTICE OF HEARING AND</b>
AMERICAN AIRLINES, S.A.,	:	<b>MOTION, PURSUANT TO</b>
	:	<b>11 U.S.C. §§ 105(a), 362(a), AND</b>
Plaintiffs,	:	<b>365(e), AND FED. R. BANKR. P.</b>
	:	<b>7065, FOR A TEMPORARY</b>
v.	:	<b>RESTRAINING ORDER AND</b>
	:	<b>PRELIMINARY INJUNCTION AND</b>
USAVFLOW LIMITED and CITIBANK, N.A.,	:	<b>HEARING</b>
	:	
Defendants.	:	
-----X	:	

<sup>1</sup> The Debtors in these cases and their federal tax identification number (if applicable), are: Avianca Holdings S.A. (N/A); Aero Transporte de Carga Unión, S.A. de C.V. (N/A); Aeroinversiones de Honduras, S.A. (N/A); Aerovías del Continente Americano S.A. Avianca (N/A); Airlease Holdings One Ltd. (N/A); America Central (Canada) Corp. (00-1071563); America Central Corp. (65-0444665); AV International Holdco S.A. (N/A); AV International Holdings S.A. (N/A); AV International Investments S.A. (N/A); AV International Ventures S.A. (N/A); AV Investments One Colombia S.A.S. (N/A); AV Investments Two Colombia S.A.S. (N/A); AV Taca International Holdco S.A. (N/A); Avianca Costa Rica S.A. (N/A); Avianca Leasing, LLC (47-2628716); Avianca, Inc. (13-1868573); Avianca-Ecuador S.A. (N/A); Aviaservicios, S.A. (N/A); Aviateca, S.A. (N/A); Avifreight Holding Mexico, S.A.P.I. de C.V. (N/A); C.R. Int'l Enterprises, Inc. (59-2240957); Grupo Taca Holdings Limited (N/A); International Trade Marks Agency Inc. (N/A); Inversiones del Caribe, S.A. (N/A); Isleña de Inversiones, S.A. de C.V. (N/A); Latin Airways Corp. (N/A); Latin Logistics, LLC (41-2187926); Nicaraguense de Aviación, Sociedad Anónima (Nica, S.A.) (N/A); Regional Express Américas S.A.S. (N/A); Ronair N.V. (N/A); Servicio Terrestre, Aereo y Rampa S.A. (N/A); Servicios Aeroportuarios Integrados SAI S.A.S. (92-4006439); Taca de Honduras, S.A. de C.V. (N/A); Taca de México, S.A. (N/A); Taca International Airlines S.A. (N/A); Taca S.A. (N/A); Tampa Cargo S.A.S. (N/A); Technical and Training Services, S.A. de C.V. (N/A). The Debtors' principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.



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**PLEASE TAKEN NOTICE** that Plaintiffs Avianca Holdings S.A., Aerovías del Continente Americano S.A. Avianca (“**Aerovías**”), Taca International Airlines, S.A., Avianca Costa Rica S.A., and Trans American Airlines, S.A. (collectively, “**Plaintiffs**”), affiliates of the above-captioned debtors (the “**Debtors**” or “**Avianca**”), by and through their undersigned attorneys, hereby move the Court, pursuant to sections 105(a), 362(a), and 365(e) of the Bankruptcy Code and Rule 7065 of the Federal Rules of Bankruptcy Procedure, for the entry of a temporary restraining order and a preliminary injunction against defendants USAVflow Limited (“**USAV**”) and Citibank, N.A. (“**Citibank**” and together with USAV, the “**Defendants**”) requiring Defendants to comply with the USAV Agreements’ standard priority of payments and to reverse debits made in violation thereof, and related relief (the “**Motion**”).

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “**Hearing**”) to consider the Motion will be held at such time and date as determined by the Court and subject to further notice before the Honorable Martin Glenn, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, 10004.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with General Order M-543 dated March 20, 2020, the Hearing will be conducted telephonically. Any parties wishing to participate must do so telephonically through CourtSolutions ([www.court-solutions.com](http://www.court-solutions.com)). Instructions to register for CourtSolutions LLC are attached to General Order M-543.

**PLEASE TAKE FURTHER NOTICE** that any objections or responses to the relief requested in the Motion, if any, shall be made in writing and filed with the Bankruptcy Court **not less than 48 hours before the Hearing**.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your view on the Motion, then you or your attorney must attend the Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter orders granting the relief requested in the Motion with no further notice or opportunity to be heard.

Dated: October 16, 2020  
New York, New York

**QUINN EMANUEL URQUHART  
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By: /s/ *James C. Tecce*

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