

WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 819-8200  
Glenn M. Kurtz  
Scott Greissman  
Joshua D. Weedman  
Mark Franke  
Brandon D. Batzel

*Attorneys for the USAV Secured Lender Group*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

	)	
In re:	)	Chapter 11
	)	
AVIANCA HOLDINGS S.A., <i>et al.</i> , <sup>1</sup>	)	Case No. 20-11133 (MG)
	)	
Debtors.	)	Jointly Administered
	)	
	)	
AVIANCA HOLDINGS S.A., AEROVÍAS	)	
DEL CONTINENTE AMERICANO S.A.	)	
AVIANCA, TACA, INTERNATIONAL	)	
AIRLINES, S.A., AVIANCA COSTA RICA	)	
S.A., and TRANS AMERICAN AIRLINES,	)	
S.A.,	)	
	)	Adv. Proc. No.: 20-01244 (MG)
Plaintiffs,	)	
	)	
v.	)	
	)	
USAVFLOW LIMITED,	)	
	)	
Defendant.	)	
	)	

<sup>1</sup> The Debtors in these chapter 11 cases, and each Debtor's federal tax identification number (to the extent applicable), are as follows: 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,



**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the USAV Secured Lender Group<sup>2</sup>, a party in interest in the above-captioned adversary proceeding and in the above-captioned chapter 11 cases (collectively, the “Cases”), hereby appears by and through its counsel, White & Case LLP, and requests, pursuant to Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and sections 102(1), 342, and 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “Bankruptcy Code”), that all notices given or required to be given and all papers served or required to be served in any one or more of these Cases be also given to and served on:

Glenn M. Kurtz  
Scott Greissman  
Joshua D. Weedman  
Mark Franke  
Brandon D. Batzel  
WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, New York 10020-1095  
Telephone: (212) 819-8200  
Facsimile: (212) 354-8113  
E-mail: gkurtz@whitecase.com  
sgreissman@whitecase.com  
jweedman@whitecase.com  
mark.franke@whitecase.com  
brandon.batzel@whitecase.com

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request applies to and includes not only the notices and papers

---

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.

<sup>2</sup> The USAV Secured Lender Group is composed of the following members: Deutsche Bank AG, London Branch; Bank United N.A.; Banco de Credito del Peru, Miami Agency; First Citizens Bank Limited; Metrobank S.A.; Prival Bank S.A.; Moneda Latinoamerica Deuda Local Fondo de Inversion; and Moneda Deuda Latinoamericana Fondo de Inversion.

referenced in the Bankruptcy Rules and Bankruptcy Code, but also includes, without limitation, all orders, notices and pleadings relating to any application, motion, petition, objection, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, courier services, hand delivery, facsimile transmission, electronic mail, telex or otherwise that (1) affects, or seeks to affect, or may potentially affect in any way, any rights or interests of any creditor or party-in-interest in these Cases, including the USAV Secured Lender Group or the members thereof; (2) affects, or seeks to affect, (a) the above-captioned Debtors and/or their estates or (b) property or proceeds thereof in the possession, custody, or control of others that any of the Debtors or their estates may seek to use; or (3) requires or seeks to require any act, delivery of any property, payment, or other conduct by the USAV Secured Lender Group or the members thereof.

**PLEASE TAKE FURTHER NOTICE** that the USAV Secured Lender Group and the members thereof do not, by filing this Notice of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim, or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this Notice of Appearance and Request for Service of Papers constitutes a waiver of any of its or their respective rights: (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) to trial by jury in any proceeding so triable in these cases, or any controversy or proceeding related to these cases; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) to have documents served in accordance with Bankruptcy Rule 7004 and Federal Rule of Civil Procedure 4, or to any other rights, claims, actions, setoffs, or recoupments to which the USAV Secured Lender Group or the members thereof are or may be

entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, or recoupments the USAV Secured Lender Group and the members thereof expressly reserve.

**PLEASE TAKE FURTHER NOTICE** that the aforementioned attorneys request that they be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in these Cases.

October 19, 2020  
New York, New York

Respectfully submitted,

**WHITE & CASE LLP**

By: /s/ Glenn M. Kurtz

Glenn M. Kurtz

Scott Greissman

Joshua D. Weedman

Mark Franke

Brandon D. Batzel

White & Case LLP

1221 Avenue of the Americas

New York, New York 10020

Telephone: (212) 819-8200

Facsimile: (212) 354-8113

gkurtz@whitecase.com

sgreissman@whitecase.com

jweedman@whitecase.com

mark.franke@whitecase.com

brandon.batzel@whitecase.com

*Attorneys for the USAV Secured Lender  
Group*