

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> , ¹)	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.)	
)	

¹ 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,



URGENT MOTION OF THE USAV SECURED LENDER GROUP FOR LEAVE TO EXCEED PAGE LIMIT WITH RESPECT TO THEIR OPPOSITION TO THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105(A), 362(A), AND 365(E), AND FED. R. BANKR. P. 7065, FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION²

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The USAV Secured Lender Group by and through its undersigned counsel, hereby files this urgent motion (the "Urgent Motion") requesting entry of an order, substantially in the form attached hereto as Exhibit A allowing the USAV Secured Lender Group to exceed, by six (6) pages, the page limit set forth in the *Order Implementing Certain Notice and Case Management Procedures* (the "Case Management Procedures") [ECF No. 47] in its *Opposition of the USAV Secured Lender Group to Motion Pursuant to 11 U.S.C. §§ 105(a), 362(a) and 365(e), and Fed. R. Bankr. P. 7065, for a Temporary Restraining Order and Preliminary Injunction* (the "Opposition"), filed substantially contemporaneously herewith. In support of this Urgent Motion, the USAV Secured Lender Group respectfully states as follows:

JURISDICTION

1. This Court has jurisdiction to consider this Urgent Motion pursuant to 28 U.S.C. §§ 157 and 1334. This adversary proceeding constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (G). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1409(a).

BASIS FOR RELIEF REQUESTED

2. On October 16, 2020, the Debtors filed the *Complaint for Permanent Injunction and Declaratory Relief* [ECF No. 1] (the "Complaint"), the Motion, the Order to Show Cause, the

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.

² Capitalized terms used herein and not otherwise defined have the meaning ascribed to them in the Opposition.

Memorandum of Law, the *Declaration of Adrian Neuhauser in Support* [ECF No. 4], the *Declaration of Jaime Alberto Arrubla-Paucar in Support* [ECF No. 5], and the *Declaration of James C. Tecce in Support* [ECF No. 6] (collectively, the “Debtors’ TRO Motion”).

3. On October 18, 2020, the USAV Secured Lender Group filed the *Letter Dated 10/18/2020 to Judge Glenn re: TRO Hearing* [ECF No. 9] recommending that the Court rule on this matter on October 29, 2020 at the hearing in the main chapter 11 cases, after the parties have the opportunity to take discovery.

4. On October 19, 2020, this Court entered the *Order Scheduling Hearing Using Zoom for Government Regarding Letters in Reference to Hearing on Order to Show Cause For Temporary Restraining Order and Preliminary Injunction* [ECF No. 10], which ordered that a hearing would be scheduled on October 20, 2020 at 2:00pm and the deadline for oppositions would be October 20, 2020 at 10:00am.

5. The USAV Secured Lender Group respectfully request that it be allowed to exceed the twenty-five (25) page limit set forth in paragraph 6 of the Case Management Procedures for responsive briefs by six (6) pages, and be permitted to file a brief of no more than thirty-one (31) pages, exclusive of the cover page, tables of contents and authorities, signature pages, exhibits, and the certificate of service.

6. The USAV Secured Lender Group respectfully submits that, although it has endeavored to be as succinct as possible in the short time that it had to respond, in order to adequately respond to all arguments raised in the Debtors’ TRO Motion documents, it requires more than the twenty-five (25) pages permitted for responsive briefs.

7. Given the circumstances described above and the date upon which the Debtors’ TRO Motion documents were filed, the USAV Secured Lender Group respectfully submits that

this request is reasonable and appropriate. Accordingly, the USAV Secured Lender Group respectfully requests that the Court grant leave for it to exceed the twenty-five (25) page limit.

NOTICE

8. Notice of this Urgent Motion will be given to the following parties or, in lieu thereof, to their counsel if known: (a) the Debtors; (b) USAV; (c) the Official Committee of Unsecured Creditors; (d) the Standard Parties (as defined in the Case Management Procedures); and (e) any party that has requested service pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the USAV Secured Lender Group submits that no further notice need be given.

NO PRIOR RELIEF

9. No prior request for the relief sought in this Urgent Motion has been made by the USAV Secured Lender Group to this or any other court.

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October 20, 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*

EXHIBIT A

PROPOSED ORDER

**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> , ¹)	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.)	

**ORDER APPROVING THE URGENT MOTION OF THE USAV SECURED LENDER
GROUP FOR LEAVE TO EXCEED PAGE LIMIT WITH RESPECT TO THEIR
OPPOSITION TO THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105(A),
362(A), AND 365(E), AND FED. R. BANKR. P. 7065, FOR A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

¹ 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, 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.

Upon consideration of the *Urgent Motion of the USAV Secured Lender Group for Leave to Exceed Page Limit with Respect to their Opposition to the Debtors' Motion Pursuant to 11 U.S.C. §§ 105(a), 362(a), and 365(e), and Fed. R. Bankr. P. 7065, For a Temporary Restraining Order and Preliminary Injunction* (the "Urgent Motion")² seeking entry of an order authorizing leave to file a responsive brief of no more than thirty-one (31) pages; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Urgent Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (G); and venue being proper in this district pursuant to 28 U.S.C. §§ 1409(a); and due and proper notice of the Urgent Motion having been provided; and objections, if any, to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is **ORDERED** that:

1. The Urgent Motion is GRANTED and approved in all respects.

2. The USAV Secured Lender Group shall be permitted to file an opposition of no more than thirty-one (31) in response to the *Debtors' Motion Pursuant to Pursuant to 11 U.S.C. §§ 105(a), 362(a), and 365(e), and Fed. R. Bankr. P. 7065, For a Temporary Restraining Order and Preliminary Injunction*.

Dated: _____, 2020

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

² Capitalized terms not defined herein shall have the meaning ascribed to them in the Urgent Motion.