

Susheel Kirpalani  
James C. Tecce  
**QUINN, EMANUEL, URQUHART  
& SULLIVAN LLP**  
51 Madison Avenue, 22nd Floor  
New York, New York 10010

Matthew Scheck  
**QUINN, EMANUEL, URQUHART  
& SULLIVAN LLP**  
865 South Figueroa St 10th Floor  
Los Angeles, CA 90017

*Special Litigation Counsel to the Debtors and Debtors in Possession*

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

-----X  
In re: : Chapter 11  
: :  
AVIANCA HOLDINGS S.A., *et al.*,<sup>1</sup> : Case No. 20-11133 (MG)  
: :  
Debtors. : (Jointly Administered)  
: :  
-----X

**FIRST CONSOLIDATED MONTHLY FEE STATEMENT OF QUINN EMANUEL  
URQUHART & SULLIVAN, LLP FOR COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL  
LITIGATION COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION DURING  
THE PERIOD OF SEPTEMBER 10, 2020, THROUGH OCTOBER 31, 2020**

Name of Applicant:	Quinn Emanuel Urquhart & Sullivan, LLP
Name of Client:	Avianca Holdings, SA
Retention Date:	September 10, 2020
Time Period Covered:	September 10, 2020, through October 31, 2020
Total Fees Requested:	\$527,354.00 (80% of \$659,192.50)
Total Expenses Requested:	\$1,246.96
Type of Fee Statement	First Consolidated Monthly Fee Statement

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), rule

<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



2016-1 of the Local Rules of Bankruptcy Practice and Procedures of the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases (the “Local Guidelines”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and (II) Granting Related Relief* entered June 9, 2020 (the “Interim Compensation Order”) (ECF No. 256), Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), special counsel to the Debtors, hereby files its *First Consolidated Monthly Fee Statement For Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Litigation Counsel to the Debtors and Debtors in Possession During the Period of September 10, 2020, Through October 31, 2020* (the “First Monthly Fee Statement”), for the amount of \$527,354.00 which represents 80% of the total fees incurred by Quinn Emanuel for reasonable and necessary professional services rendered and \$1,246.96 for the reimbursement of the actual and necessary expenses incurred from September 10, 2020, through October 31, 2020 (the “Fee Period”), for a total of \$528,600.96.

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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); Nicaragüense de Aviación, Sociedad Anónima (Nica, S.A.) (N/A); Regional Express Américas S.A.S. (N/A); Ronair N.V. (N/A); Servicio Terrestre, Aéreo 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); AV Loyalty Bermuda Ltd. (N/A); Aviacorp Enterprises S.A. (N/A). The Debtors’ principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.

**Itemization of Services Rendered and Disbursements Incurred**

1. In support of this First Monthly Fee Statement, Quinn Emanuel has attached the following:

Exhibit A is a summary schedule of hours and fees covered by this First Monthly Fee Statement, categorized by project code;

Exhibit B is a summary schedule of the time expended by all Quinn Emanuel professionals and paraprofessionals engaged in the representation of the Debtor during the Fee Period;

Exhibit C is a summary of expenses incurred by Quinn Emanuel during the Fee Period;

Exhibit D is a detailed invoice for the hours expended and fees incurred by Quinn Emanuel professionals and paraprofessionals engaged in the representation of Avianca for the month of September, 2020; and

Exhibit E is a detailed invoice for the hours expended and fees incurred by Quinn Emanuel professionals and paraprofessionals engaged in the representation of Avianca for the month of October 2020, as well as a summary of the expenses incurred by Quinn Emanuel during October 2020.

**Representations**

2. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this First Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. Quinn Emanuel reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee statements and applications will be filed in accordance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, Local Guidelines, and the Interim Compensation Order.

**Notice**

3. Notice of this First Monthly Fee Statement has been provide to all necessary parties in accordance with the Interim Compensation Order.

4. Objections to this First Monthly Statement, if any, must be filed by the objection deadline and served upon Quinn Emanuel, 51 Madison Ave., New York, NY 10001, Attn: James Tecce, Esq., and Zachary Russell, Esq.; Email: [jamestecce@quinnemanuel.com](mailto:jamestecce@quinnemanuel.com); [zacharyrussell@quinnemanuel.com](mailto:zacharyrussell@quinnemanuel.com), no later than December 10, 2020, at 12:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). Objections to this First Monthly Fee Statement, if any, must set forth the nature of the objection and the specific amount of fees or expenses at issue.

5. If no objection to this First Monthly Fee Statement is received by the Objection Deadline, the Debtors shall promptly pay Quinn Emanuel 80% of the fees and 100% of the expenses identified in this First Monthly Fee Statement. To the extent that an objection to this First Monthly Fee Statement is received by the Objection Deadline, the Debtors shall withhold payment of that portion of this First Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

WHEREFORE, Quinn Emanuel Urquhart & Sullivan, LLP respectfully requests payment of \$527,354.00, which is 80% of the fees incurred for reasonable and necessary professional services rendered during the Fee Period and \$1,246.96, representing 100% of the actual and necessary costs and expenses incurred during the Fee Period.

Respectfully submitted this 25<sup>th</sup> day of November, 2020.

New York, New York

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

/s/ JAMES C. TECCE

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Susheel Kirpalani  
James C. Tecce  
Deborah J. Newman  
Nathan Goralnik  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

Matthew Scheck  
865 South Figueroa St 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

*Special Litigation Counsel to the  
Debtors and Debtors in Possession*

**EXHIBIT A**

<b>PROJECT CODE</b>	<b>PROJECT CATEGORY</b>	<b>TOTAL HOURS</b>	<b>TOTAL FEES</b>
AV01	Case Administration	.5	\$177.50
AV02	Fee/Employment Applications	32.7	\$33,202.50
AV04	Litigation	566.5	625,812.50
<b>TOTAL</b>		<b>599.7</b>	<b>\$659,192.50</b>

**EXHIBIT B**

<b>PROFESSIONAL</b>	<b>TITLE</b>	<b>HOURS</b>	<b>RATE</b>	<b>AMOUNT</b>
K. John Shaffer	Partner	3.1	\$1,595.00	\$4,944.50
James C. Teece	Partner	180.3	\$1,325.00	\$238,897.50
Deborah Newman	Partner	57.1	\$1,200.00	\$68,520.00
Matthew R. Scheck	Partner	85.0	\$1,100.00	\$93,500.00
Nathan Goralnik	Associate	173.7	\$995.00	\$172,831.50
Jordan Harap	Associate	38.1	\$925.00	\$35,242.50
Zachary Russell	Associate	44.1	\$875.00	38,587.50
Christopher Clark	Attorney	0.1	\$380.00	\$38.00
Nicholas Ficorelli	Managing Clerk	2.5	\$405.00	\$1,012.50
Eugenia Jones	Managing Clerk	0.9	\$405.00	\$364.50
Caitlin Garvey	Paralegal	14.3	\$355.00	\$5,076.50
Eric Passaglia	Paralegal	0.5	\$355.00	\$177.50
<b>Total</b>		<b>599.7</b>		<b>\$659,192.50</b>

**EXHIBIT C**

<b>EXPENSE</b>	<b>COST</b>
Outside Record Production	\$163.20
Document Reproduction	\$18.30
Translation	\$900.00
Document Services	\$95.46
Conference Fee	\$70.00
<b>Total</b>	<b>\$1,246.96</b>



**EXHIBIT D**

**quinn emanuel trial lawyers**

865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017

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SALT LAKE CITY |

October 19, 2020

Renato Covelo  
Avianca Holdings, S.A.  
Aquilino de la Guardia Calle No. 8,  
IGRA Building P.O.  
Panama City, Republic of Panama

Matter #: 10239-00001  
Invoice Number: 101-0000108672  
Responsible Attorney: James C. Tecce

In re Avianca Holdings S.A., et al.

For Professional Services through September 30, 2020 in connection with Quinn Emanuel Urquhart & Sullivan, LLP acts as special litigation counsel to Avianca Holdings, S.A. and its affiliated debtors and debtors in possession in the chapter 11 cases, In re Avianca Holdings S.A., et al., No. 20-11133 (MG) (Bankr. S.D.N.Y.).

Fees	\$231,456.50
Total Due This Invoice	<u>\$231,456.50</u>

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## Statement Detail

### AV02 Fee/Employment Applications

09/10/20	ZR1	Prepare retention application.	0.80	700.00
09/11/20	ZR1	Prepare retention app documents.	6.80	5,950.00
09/12/20	ZR1	Prepare retention application.	4.10	3,587.50
09/13/20	ZR1	Prepare retention application papers.	1.10	962.50
09/13/20	JCT	Revise retention application.	2.80	3,710.00
09/14/20	JCT	Retention: Outline riders for disclosure declaration and internal emails regarding same.	0.70	927.50
09/15/20	ZR1	Review and revise retention application papers.	1.20	1,050.00
09/15/20	JCT	Retention: Review Company comments to retention application and finalize same for transmission to UST (.8); emails with Russell re same (.2).	1.00	1,325.00
09/17/20	JCT	Retention: Correspondence with UST, Milbank regarding retention issues; internal emails re same, revisions to retention application.	1.60	2,120.00
09/18/20	ZR1	Prepare notices of appearance (.3); review and revise retention application documents (.6).	0.90	787.50
09/18/20	JCT	Review final retention application (1.0); emails with Milbank re same (.1).	1.10	1,457.50
09/21/20	ZR1	Review and revise retention application documents.	1.10	962.50
09/21/20	JCT	Emails regarding revisions to retention papers with Milbank, Russell; review modifications.	0.50	662.50
09/28/20	ZR1	Review and revise retention application.	0.60	525.00
09/28/20	JCT	Emails w/Milbank regarding retention application and client	0.20	265.00

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		questions re same.		
09/30/20	JCT	Review draft application to finalize same, additional comments (.5); call with client, Milbank re same and further emails with same, Russell re revisions (.5).	1.00	1,325.00
09/30/20	ZR1	Call with debtors re retention application (.3); review and revise retention application (1.1).	1.40	1,225.00
		SUBTOTAL	26.90	27,542.50

### AV04 Litigation

09/10/20	JCT	Call with Scheck, Russell re next steps (.3); review underlying documents (.5); call with Milbank (Reneger), Scheck, Russell re status, next steps (.9); post call with Scheck (.1).	1.80	2,385.00
09/10/20	ZR1	Team call re case status (.5); Call with debtors counsel re case status (.9).	1.40	1,225.00
09/13/20	JCT	Review documents, pleadings to outline arguments for potential claims.	1.70	2,252.50
09/14/20	ZR1	Prep for and attend call with Debtors' counsel (.9); prepare complaint (1.8); legal research on lift stay showing (3.4).	6.10	5,337.50
09/14/20	JCT	Litigation: Call with Scheck, Russell re potential claims, pleadings (.5); call with Milbank (Reneger, Dexter) re agreements (.5).	1.00	1,325.00
09/14/20	JCT	Document review to prepare complaint.	0.40	530.00
09/14/20	MRS	Analysis of potential claims and review of documents related to same (1.9); attending internal call regarding potential claims (.5); call with Milbank regarding potential claims (.7).	3.10	3,410.00

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09/15/20	ZR1	Legal research on lift stay (3.4); prepare complaint (.8).	4.20	3,675.00
09/15/20	NG1	E-mails to J. Tecce & M. Scheck regarding complaint and motion papers.	0.10	99.50
09/15/20	JCT	Review of agreements / documents / pleadings / court hearing, decision and outline arguments and pleadings structure.	5.80	7,685.00
09/15/20	MRS	Call with Z. Russell regarding legal strategy and issues (.9); analyzing RSPA transaction documents and outlining arguments related to same (1.2).	2.10	2,310.00
09/16/20	ZR1	Call with NG and MS re complaint.	0.70	612.50
09/16/20	JCT	Outline theories for litigation with review of leading authorities and documents and pleadings.	2.80	3,710.00
09/16/20	NG1	Teleconference with M. Scheck & Z. Russell (0.7); prepare temporary restraining order and preliminary injunction papers (3.0); review docket (0.1); e-mails to M. Scheck & Z. Russell (0.1).	3.90	3,880.50
09/16/20	MRS	Internal call regarding potential claims and legal strategy (0.7); analyzing documents and legal research related to stay violation claims (1.1).	1.80	1,980.00
09/17/20	ZR1	Team call re case status (.5); Call with debtors counsel re case status (.9).	1.40	1,225.00
09/17/20	ZR1	Prepare retention application.	0.80	700.00
09/17/20	JCT	Review theories for potential claims with related review of documents and leading case authorities (3.6); call with Milbank re case status (.6); post call confs w/Scheck and Goranick re next steps (.2).	4.40	5,830.00
09/17/20	MRS	Analyzing transaction agreements and correspondence, and conferring	3.10	3,410.00

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		internally regarding the same (1.4); drafting complaint against Citibank and USAV (1.7).		
09/17/20	NG1	Teleconference with J. Tecce, M. Scheck & Z. Russell (0.4); teleconference with M. Scheck (0.2); legal research regarding contract rejection (1.7); review USAV agreements (0.8).	3.10	3,084.50
09/18/20	NG1	Teleconference with M. Scheck (0.6); e-mails to C. Brush & Z. Russell regarding PACER filings (0.4); prepare insert for draft complaint (1.5); e-mail to M. Scheck regarding draft complaint (0.2); review USAV Agreements and March Letter (0.2); review rejection decision (0.3); prepare draft complaint (2.0); review rejection motion filings (1.1).	6.30	6,268.50
09/18/20	MRS	Drafting complaint and analyzing transaction documents related to same.	1.30	1,430.00
09/19/20	NG1	Prepare draft complaint.	6.20	6,169.00
09/20/20	ZR1	Legal research on effect of rejection (.4.3); prepare complaint (.4).	4.70	4,112.50
09/20/20	NG1	Confer with M. Scheck & Z. Russell regarding draft complaint (0.7); review and revise draft complaint (3.1); legal research for draft complaint (0.2).	4.00	3,980.00
09/20/20	JCT	Review leading authorities on rejection for stay pleadings.	1.00	1,325.00
09/20/20	MRS	Reviewing and revising draft complaint against Citibank, research related to same, and conferring internally regarding the same.	1.90	2,090.00
09/21/20	ZR1	Review and revise complaint.	1.20	1,050.00
09/21/20	NG1	Prepare draft complaint (7.3); e-mails to M. Scheck regarding same (0.1); e- mails to Z. Russell regarding same (0.1).	7.50	7,462.50

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09/21/20	MRS	Reviewing and revising complaint, research and analysis related to same, and conferring internally regarding the same (2.4); internal call with J. Tecce, N. Goralnik, and Z. Russell regarding complaint and litigation strategy (1.1).	3.50	3,850.00
09/21/20	JCT	Email memorandum to S. Kirpalani outlining open issues, theories (.8); review leading authorities on rejection (1.6); emails to Scheck, Goralnik re same (.4); call w/A. Renneger (Milbank) re status (.1); outline pleadings, arguments with review of case law and underlying agreements (2.8).	5.70	7,552.50
09/22/20	ZR1	Team call re case complaint.	1.10	962.50
09/22/20	MRS	Reviewing and revising complaint (2.1); internal call regarding Avianca complaint and strategy (1.1).	3.20	3,520.00
09/22/20	NG1	Prepare draft complaint & e-mail to M. Scheck regarding same (1.4); e-mail to J. Tecce regarding motion papers (0.1); review and revise draft complaint & e-mail to S. Kirpalani regarding same (1.9); confer with M. Scheck regarding draft complaint (0.7).	4.10	4,079.50
09/22/20	JCT	Revise draft complaint with review of underlying documents (1.6); call with Scheck, Goralnik, Russell re same (.8).	2.40	3,180.00
09/23/20	NG1	E-mail to J. Tecce regarding rejection (0.1); prepare Neuhauser Declaration (3.0).	3.10	3,084.50
09/23/20	JCT	Outline arguments and theories for declaratory relief (1.8); revise complaint regarding same (3.7); review of underlying documents in support of same (1.9).	7.40	9,805.00
09/24/20	MRS	Revising complaint and analyzing transaction documents related to same (1.8); revising declarations in	3.50	3,850.00

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		support of preliminary injunction and TRO, and review of documents and conferring internally regarding the same (1.7).		
09/24/20	NG1	E-mails to M. Scheck regarding Neuhauser Declaration (0.1); prepare draft Neuhauser Declaration (0.8); confer with M. Scheck (0.3); review and revise draft Neuhauser Declaration (0.7).	1.90	1,890.50
09/24/20	JCT	Revise Avianca complaint (4.2) with review of underlying agreements (2.5) and authorities (.5).	7.20	9,540.00
09/25/20	MRS	Preparing for and participating in internal call regarding complaint and injunctive relief.	1.30	1,430.00
09/25/20	NG1	Legal research for memorandum of law in support of temporary restraining order and preliminary injunction (0.7); prepare brief for same (2.3); teleconferences with J. Tecce & M. Scheck (1.0).	4.00	3,980.00
09/25/20	JCT	Review Scheck Comments to complaint (.4); revise complaint for distribution to clients for review (3.8); review underlying agreements (.5); review draft declaration and precedents for evidentiary submissions for application (.8); call with Scheck, Gorlnik re pleadings / theories (.8).	6.30	8,347.50
09/26/20	JCT	Review memoranda and declarations on Colombian law for injunction papers.	1.50	1,987.50
09/27/20	NG1	Prepare motion for temporary restraining order and preliminary injunction (2.2); e-mails to M. Scheck regarding same (0.1); e-mails to E. Dexter regarding Neuhauser Declaration (0.1).	2.40	2,388.00
09/28/20	JH1	Call with J. Tecce and M. Scheck (0.4); legal research (1.5); emails re: same	2.30	2,127.50



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		(0.4).		
09/28/20	NG1	Conference call with Colombian law experts (0.9); prepare notes for Arrubla Declaration (0.2); prepare memorandum of law and legal research for same (5.5); confer with A. Renenger & E. Dexter regarding draft complaint (0.4).	7.00	6,965.00
09/28/20	MRS	Internal call regarding complaint and TRO (.5); call with Colombian law expert regarding legal issues related to TRO (0.9); review of declarations from rejection motion and conferring internally regarding the same (0.7); conferring with Debtors' counsel regarding factual information relating to USAV, and analysis of agreements related to same (0.9).	3.00	3,300.00
09/28/20	JCT	Review client/Milbank comments to pleadings (.3); revise same (2.2); review Columbian law issues (.6); review rejection authorities (.6); call with Milbank re litigation, open issues (1.0); confs w/Scheck and Harap re research issues, next steps (.5); call with Milbank, Columbian firm re Columbian law (.8); review results of Harap research (.2).	6.20	8,215.00
09/29/20	JCT	Review additional research on standards for injunctive relief from Harap (.6) and emails with Harap and Scheck and Goralnik re same, theories (.3).	0.90	1,192.50
09/29/20	NG1	E-mails to M. Scheck, J. Tecce & J. Harap regarding memorandum of law (0.2); review draft complaint (0.4); review draft Neuhauser Declaration (0.1); review USAV agreements (0.1); prepare memorandum of law and legal research for same (5.9).	6.70	6,666.50
09/29/20	JH1	Legal research re: TRO and related issues (1.3); emails re: same (0.3).	1.60	1,480.00

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09/29/20	MRS	Conferring internally regarding TRO and preliminary injunction brief.	0.70	770.00
09/30/20	JCT	Outline issues for Columbian law declaration (1.3); emails with Scheck re same (.1); related review of precedents and authorities (.9).	2.30	3,047.50
09/30/20	NG1	Prepare memorandum of law in support of temporary restraining order / preliminary injunction and legal research for same (4.2); e-mails to M. Scheck regarding motion papers (0.3); prepare Arrubla Declaration and e-mails regarding same (1.6); confer with M. Scheck & J. Harap regarding motion papers (0.5); legal research regarding impact of rejection (0.4); e-mail regarding proposed order (0.1); review and revise memorandum of law (1.8).	8.90	8,855.50
09/30/20	MRS	Conferring internally regarding TRO and preliminary injunction, research related to same, and reviewing and revising brief related to same.	1.90	2,090.00
09/30/20	JH1	Call with M. Scheck, N. Goralnik (0.6); emails with MCO re: TRO/PI filings (0.3); review materials (0.4).	1.30	1,202.50
SUBTOTAL			185.20	203,914.00

### Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
James C. Tecce	JCT	Partner	67.70	1,325.00	89,702.50
Matthew R. Scheck	MRS	Partner	30.40	1,100.00	33,440.00
Nathan Goralnik	NG1	Associate	69.20	995.00	68,854.00
Jordan Harap	JH1	Associate	5.20	925.00	4,810.00
Zachary Russell	ZR1	Associate	39.60	875.00	34,650.00

### Expense Summary

Description	Amount
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Description	Amount
Online Research	0.00
Total Expenses	\$0.00

**quinn emanuel trial lawyers**

**quinn emanuel urquhart & sullivan, llp**

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SALT LAKE CITY |

### Current Invoice Summary

Matter Name : In re Avianca Holdings S.A., et al.

Matter #: 10239-00001

Bill Date: October 19, 2020

Invoice Number: 101-  
0000108672

Total Fees.....\$231,456.50

Total Due this Invoice.....\$231,456.50

**Payment Due By November 22, 2020**

**Please reference invoice number and send check to:**

**Quinn Emanuel Urquhart & Sullivan, LLP**

865 S. Figueroa St., 10th Floor

Los Angeles, CA 90017

Or Wire funds

to:

Account Info:

Bank Account:

Bank ABA No.:

Swift Code:

**References:**

City National Bank

555 South Flower St., 12th Floor

Los Angeles, CA 90071

Quinn Emanuel Urquhart & Sullivan, LLP

Deposit Account #210032347

1220-16066

CINAUS6L

***Invoice number and client name / matter number please***

Tax ID# 95-4004138

**EXHIBIT E**

**quinn emanuel trial lawyers**

865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY |  
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SALT LAKE CITY |

November 17, 2020

Renato Covelo  
Avianca Holdings, S.A.  
Aquilino de la Guardia Calle No. 8,  
IGRA Building P.O.  
Panama City, Republic of Panama

Matter #: 10239-00001  
Invoice Number: 101-0000109661  
Responsible Attorney: James C. Tecce

In re Avianca Holdings S.A., et al.

For Professional Services through October 31, 2020 in connection with Quinn Emanuel Urquhart & Sullivan, LLP acts as special litigation counsel to Avianca Holdings, S.A. and its affiliated debtors and debtors in possession in the chapter 11 cases, In re Avianca Holdings S.A., et al., No. 20-11133 (MG) (Bankr. S.D.N.Y.).

Fees	\$427,736.00
Expenses	<u>\$1,246.96</u>
Net Amount	\$428,982.96
Total Due This Invoice	\$428,982.96
Balance Due from Previous Statement(s)	\$231,456.50
Total Balance Due	<u>\$660,439.46</u>

**Confidential – May include attorney-client privileged and work-product information**

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sydney | hong kong | houston | brussels | seattle | zurich | shanghai | stuttgart | perth | boston | salt lake city

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**Statement Detail**

**AV01 Case Administration**

10/19/20	EP	Filed a Notice of Appearance for Nathan Goralnik.(00:30).	0.50	177.50
SUBTOTAL			0.50	177.50

**AV02 Fee/Employment Applications**

10/01/20	ZR1	Correspondence re retention app and finalize same (1.1).	1.10	962.50
10/07/20	ZR1	review and revise retention app (.3).	0.30	262.50
10/15/20	ZR1	Prepare supplemental declaration in support of retention (1.5); review fee procedures and invoice (.6).	2.10	1,837.50
10/16/20	JCT	Revise supplemental disclosure declaration and related emails w/Russell (1.3).	1.30	1,722.50
10/16/20	ZR1	review and revise supplemental declaration (.4).	0.40	350.00
10/19/20	ZR1	Supplemental declaration (.6).	0.60	525.00
SUBTOTAL			5.80	5,660.00

**AV04 Litigation**

10/01/20	JCT	Review expert declaration on Columbian law (.5); review injunction precedents (.5) and case law (.5); call w/M. Scheck re status (.1); revise memorandum of law (1.4); calls w/Newman re litigation (.4).	3.40	4,505.00
10/01/20	DN6	Confer w/ J. Tecce regarding case (.6).	0.60	720.00
10/01/20	MRS	Revising complaint against Citibank and USAV, revising TRO and PI brief related to complaint, research related to same, review of documents related to same, and conferring internally regarding the same (5.7); analysis of security agreements, and conferring	7.30	8,030.00

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		with co-counsel and internally regarding the same (1.6).		
10/01/20	JH1	Emails with team and MCO re: filing (0.3); call with M. Scheck (0.2); review TRO transcript, filings, and pleadings (2.5); circulate same (0.1); read and revise complaint (1.8).	4.90	4,532.50
10/01/20	NG1	Prepare Neuhauser Declaration (1.4); e-mail to M. Scheck regarding Neuhauser Declaration (0.1); document review for Neuhauser Declaration (0.3); e-mails to J. Harap & M. Scheck regarding Tecce Declaration (0.3); document review for Tecce Declaration (0.2); teleconferences with M. Scheck (1.2); e-mails to J. Harap & Z. Russell regarding temporary restraining order (0.2); e-mails to M. Scheck regarding draft complaint (0.3); legal research for memorandum of law (1.4); e-mail to M. Scheck regarding Arrubla Declaration (0.1); review draft memorandum of law (0.9); review draft complaint (0.8); legal research regarding rejection (0.8).	8.00	7,960.00
10/02/20	JCT	Revise memorandum of law in support of injunction with review of underlying agreements and leading case law (6.9); review supporting declarations (.8); calls and emails with Scheck, Goralnik, Harap re same (.6).	8.30	10,997.50
10/02/20	NF3	Spoke to attorney re Procedure for commencing adversary proceeding in SDNY Bankruptcy (.3); Procedure for TRO and Preliminary Injunction Filing in SDNY Bankruptcy (.3); Possible Timeline for Response and Hearing on TRO based off docket research and Judge Glenn's rules (.4).	1.00	405.00
10/02/20	JH1	Calls with J. Tecce (0.3); team call (0.3); research re: injunctive relief and	1.30	1,202.50



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		emails re: same (0.5); call with MCO (0.2).		
10/02/20	NG1	E-mails to J. Tecce, M. Scheck & J. Harap regarding motion papers (0.3); e-mail to M. Scheck regarding Neuhauser Declaration (0.2); prepare Neuhauser Declaration (1.0); teleconference with J. Tecce and others (0.4); legal research for memorandum of law (2.4); e-mails to M. Scheck regarding complaint (0.3); review and revise draft complaint (0.6); review and revise memorandum of law (0.8).	6.00	5,970.00
10/02/20	MRS	Internal call regarding TRO and PI (0.4); revising memorandum of law and Neuhauser declaration, conferring internally regarding the same, and research and factual analysis regarding the same (4.2).	4.60	5,060.00
10/03/20	JH1	Prepare Tecce declaration (1.0).	1.00	925.00
10/03/20	DN6	Review case materials (2.1).	2.10	2,520.00
10/04/20	JH1	Emails re: complaint and motion (0.2); read pleadings and other background documents (3.7).	3.90	3,607.50
10/05/20	JCT	Review leading authorities to support application (3.2); revise arguments in pleadings re same (2.4).	5.60	7,420.00
10/05/20	NG1	Prepare proposed order for motion papers (1.0); review and revise notice of motion (0.4).	1.40	1,393.00
10/05/20	JH1	Review docket and emails re: service issues (0.3).	0.30	277.50
10/05/20	DN6	Review case law, prior pleadings and agreements relating to application (6.4).	6.40	7,680.00
10/06/20	DN6	Review case law, prior pleadings and agreements relating to application (5.8).	5.80	6,960.00
10/06/20	JCT	Review standards applicable to	1.90	2,517.50

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		injunctive relief (1.0); review evidentiary issues and declarations to support application (.7); call w/Reneger re case status (.2).		
10/06/20	MRS	Conferring internally regarding Neuhauser declaration, and revising same (0.6); legal research related to estate property issues (0.8).	1.40	1,540.00
10/07/20	NG1	Prepare demonstratives for motion papers and hearing (1.4); e-mails to M. Scheck regarding rejection (0.2); confer with R. Mccausland regarding Arrubla Declaration (1.0); prepare Neuhauser Declaration (0.9).	3.50	3,482.50
10/07/20	DN6	Draft list of questions regarding case law, prior pleadings and agreements relating to application (2.2); Confer with J. Tecce regarding same (.2).	2.40	2,880.00
10/07/20	JCT	Outline hearing presentation and demonstratives for annexation to pleading (1.8); emails with Milbank re status (.2); call w/D. Newman re theories (.2); review evidentiary issues and submissions (1.1); call with expert counsel (1.0).	4.30	5,697.50
10/07/20	MRS	Call with client and Colombian law expert regarding TRO and Colombia law issues (1.0).	1.00	1,100.00
10/08/20	JCT	Conf w/Newman re injunction action theories (.9); conf w/Scheck re injunction action theories (.7); revise pleadings for client distribution (.6).	2.20	2,915.00
10/08/20	NG1	Review and revise Neuhauser Declaration and fact research for same (1.1); review and revise demonstratives (0.3).	1.40	1,393.00
10/08/20	DN6	Review complaints and case law (5.2); Confer with J. Tecce (.9).	6.10	7,320.00
10/08/20	MRS	Research on estate property issue (0.6); call with j. Tecce regarding TRO and PI timing and strategy (0.5).	1.10	1,210.00

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10/09/20	JCT	Prepare for client call re litigation (.8); conduct same w/A. Nauhauser, E. Fleck, A. Reneger, others (.8); outline talking points for court presentation (3.6); further calls and emails with M. Scheck, E. Dexter (.3).	5.50	7,287.50
10/09/20	JH1	Legal research re: recoupment and emails re: same (1.0).	1.00	925.00
10/09/20	DN6	Review complaints, case materials and TRO motion (2.1).	2.10	2,520.00
10/09/20	MRS	Attending call with client regarding automatic stay action and related issues (1.0); research related to TRO and PI issues and conferring internally regarding the same (1.2).	2.20	2,420.00
10/12/20	JCT	Revise complaint and memo of law in support of TRO (4.5); review results of Harap legal research and Scheck contractual review with review of related agreements (1.6); call w/Scheck re same (1.0); call w/Declarant regarding declaration (.5); revise same based on same (.4).	8.00	10,600.00
10/12/20	NG1	Confer with M. Scheck regarding sweeps (0.5); prepare spreadsheet regarding sweeps (0.8); review draft motion papers (1.1).	2.40	2,388.00
10/12/20	MRS	Call with J. Tecce regarding waterfall analysis for TRO and related issues (1.0); drafting analysis of waterfall issue, and analyzing documents related to same (1.8); legal research related to property of the estate issue and conferring internally regarding the same (0.6); call with client regarding Neuhauser declaration and revising the declaration (0.9); conferring internally regarding TRO papers and research issues (0.6).	4.90	5,390.00
10/13/20	KJS	Analyze documents and confer with Matt Scheck re USAV account and automatic stay action; research re	0.80	1,276.00

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		same (.80).		
10/13/20	JCT	Revise complaint and TRO Memo based on updated submissions, cases (1.5); review proposed evidentiary submissions, declarations (.6); revise argument outline for injunction hearing (3.4); review stay motion filed by USAV (.3).	5.80	7,685.00
10/13/20	NG1	E-mail to J. Tecce regarding Collection Coverage Ratio (0.1); review and revise schedule to Neuhauser Declaration (0.6); e-mails to M. Scheck regarding same (0.1); review and revise Neuhauser Declaration (1.0); e-mails to M. Scheck & co-counsel (0.4); prepare Tecce Declaration (1.4).	3.60	3,582.00
10/13/20	MRS	Conferring internally regarding TRO and related documents (0.8); reviewing and revising Neuhauser declaration, factual research related to same, and conferring internally regarding the same (0.9); research related to automatic stay and revising TRO brief related to same (1.2).	2.90	3,190.00
10/14/20	NG1	Review USAV loan agreement (0.8); e-mail to J. Tecce regarding Interest Periods and Payment Dates (0.3); review maturity notice (0.1); e-mail to J. tecce regarding same (0.1).	1.30	1,293.50
10/14/20	JCT	Revise argument outline for injunctive relief (2.5); call with A. Reneger (Milbank) re results of hearing (.5); outline next steps for same (.8) and conf w/Newman re same (.2); email to clients re same (.1); review emails from Scheck, Goralnik on agreement provisions (.2).	4.30	5,697.50
10/14/20	MRS	Conferring internally regarding TRO, including DIP issues in relation to TRO (0.8); review of TRO brief and research related to same (0.8).	1.60	1,760.00

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10/15/20	KJS	Confer with Matt Scheck re TRO motion and proposed relief; revise same (.70).	0.70	1,116.50
10/15/20	NG1	Review and revise complaint (2.9); e-mails to M. Scheck & J. Harap regarding complaint (0.1); conference calls with M. Scheck & J. Harap regarding filings (1.0); coordinate Arrubla Declaration (1.2); review and revise memorandum of law (1.5); review exhibits to be filed and e-mails regarding same (0.2); proofread and revise motion papers (2.6).	9.50	9,452.50
10/15/20	MRS	Call with USAV lenders regarding TRO application and internal correspondence regarding the same (0.6); reviewing and revising Arrubla declaration, conferring internally regarding the same, and call with expert and team regarding the same (1.4); revising TRO motion and related documents, research related to same, and conferring internally regarding the same (1.4).	3.40	3,740.00
10/15/20	JH1	Emails re: filing with M. Scheck, N. Goralnik, C. Garvey (0.1).	0.10	92.50
10/15/20	DN6	Call with opposing counsel (.2); Confer with J. Tecce and M. Scheck regarding same (.4).	0.60	720.00
10/15/20	JCT	Emails and calls with USAVflow, Citibank / counsel regarding meet and confer (.5); revise pleadings for filing (5.3); review Arubbla declaration (1.6); call with USAVflow, Lenders' counsel re scheduling (.3); post confs w/Newman, Scheck re next steps and emails to Citibank and client re scheduling (.5); call with expert, Scheck re submission (.7).	8.90	11,792.50
10/16/20	JCT	Finalize pleadings, complaint memo, for filing (4.3); review next steps w/Newman and email to clients re scheduling (.2); correspondence with	6.80	9,010.00

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		counsel to lender group and to Court regarding briefing schedule (1.0); revise proposed Order (.7); calls w/Scheck, Goralnik and Harap re filing (.6).		
10/16/20	NF3	Spoke to attorneys re: 1. Procedure for commencement of adversary proceeding and for submission of orders to show cause to Judge Glenn; 2. Review of draft papers to be filed with commencement documents, SDNY Bankruptcy. (N. Goralnik).	1.00	405.00
10/16/20	KJS	Analyze documents and confer with Matt Scheck re TRO motion and preparation for same (0.6).	0.60	957.00
10/16/20	JH1	Prepare notice (1.0); conf. call re: filing (0.2); emails re: same with team (0.2), MCO, etc.; email to Chambers (0.3).	1.70	1,572.50
10/16/20	CG3	Prepare materials related to complaint and TRO application (5.9).	5.90	2,094.50
10/16/20	MRS	Internal team call regarding TRO and preliminary injunction filing (1.1); finalizing brief, declarations, proposed order and related documents, and conferring internally and with Debtors' counsel regarding the same (4.3).	5.40	5,940.00
10/16/20	NG1	Prepare complaint and motion papers for filing, working with M. Scheck, J. Tecce, J. Harap, C. Garvey, and N. Ficorelli (12.9).	12.90	12,835.50
10/17/20	JCT	Review pleadings as filed and outline talking points for oral argument (3.4).	3.40	4,505.00
10/17/20	NG1	E-mail to L. Weber & S. Shelley regarding motion paper (0.1).	0.10	99.50
10/18/20	CC4	File TRO Letter with the Court (0.1).	0.10	38.00
10/18/20	JCT	Revise hearing outline (2.5); correspondence with lenders, Citibank and clients regarding hearing timing (.7); revise	5.70	7,552.50

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		correspondence to Court re same (2.5).		
10/18/20	JH1	Read emails (0.2); legal research (0.5); file letter and submit to chambers (0.5).	1.20	1,110.00
10/18/20	DN6	Emails and call with J. Tecce regarding letter to Court (.5); Review same (.3).	0.80	960.00
10/18/20	MRS	Review of correspondence from USAV Lenders, and conferring internally regarding the same (0.8); reviewing and revising draft letter to Court regarding TRO schedule and related issues (0.4).	1.20	1,320.00
10/19/20	KJS	Confer with Matt Scheck regarding preparation for TRO hearing (0.3).	0.30	478.50
10/19/20	JCT	Review W&C letter to Court on TRO hearing (.1); review scheduling issues from Court orders and calls and correspondence with Court, clients, witnesses re same (1.7); hearing preparation: outline talking points, review leading authorities (4.6); review logistical issues (.8); calls and emails w/Scheck, Newman, Goralsnik re hearing (.9); review witness issues, outlines for hearing (2.2); calls and correspondence re Committee intervention with Morrison Forester, Scheck re stipulation (.2); review proposed stipulation (.2); call with witness re hearing (.8); post call confs w/Scheck re same (.4).	11.90	15,767.50
10/19/20	JH1	Call with J. Tecce et al. re: TRO hearing (0.8); read pleadings and background materials (3.3).	4.10	3,792.50
10/19/20	EJ2	E filed the following in Southern District Bankruptcy: Amended Notice of Hearing regarding ECF# 2 (.3).	0.30	121.50
10/19/20	NG1	Confer with J. Arrubla regarding hearing (0.7); confer with J. Harap	8.90	8,855.50

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		regarding hearing (0.1); confer with Milbank regarding hearing (0.1); e-mails to J. Tecce, D. Newman, E. Dexter, R. Mccausland, D. Weigand & others regarding hearing preparation (2.0); prepare notices of appearance and e-mails regarding same (1.3); confer with J. Tecce and others regarding hearing preparation (1.0); e-mails to translator services (0.5); confer with D. Weigand (0.2); prepare witness and exhibit list (1.8); coordinate midnight filings (0.9); prepare amended notice of hearing (0.3).		
10/19/20	CG3	Prepare materials for upcoming TRO hearing (6.8); coordinate logistics of same (0.5).	7.30	2,591.50
10/19/20	EJ2	E filed the following in Southern District Bankruptcy: Statement PLAINTIFFS WITNESS AND EXHIBIT LIST (.3).	0.30	121.50
10/19/20	JCT	Revise supplemental declaration and emails with Milbank, Avianca re same (0.8).	0.80	1,060.00
10/19/20	MRS	Internal team call for hearing preparation (1.1); review intervention stipulation and conferring with Committee counsel regarding the same (0.6); conferring internally regarding TRO and hearing (0.8); Preparation session with Dr. Arrubla and preparing for same (1.6); drafting outline of cross examination issues related to Dr. Arrubla testimony (0.9); preparation for TRO hearing and overseeing filings related to same (1.2).	6.20	6,820.00
10/19/20	DN6	Review materials relating to TRO motion (7.2); Confer with J. Tecce and M. Scheck regarding same (.9).	8.30	9,960.00
10/20/20	KJS	Analyze opposition to TRO; research and confer with Matt Scheck	0.70	1,116.50



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		regarding same (0.7).		
10/20/20	JH1	Preparation for TRO hearing (1.0); attend TRO hearing (2.5); legal research (2.5); review filings and related materials (1.0); prepare reply brief (1.5); follow-up meetings and calls re: same (0.4).	8.90	8,232.50
10/20/20	NG1	Motion hearing (3.0); prepare and coordinate filing of notice of adjournment (0.9); e-mails to translator (0.4); e-mails to A. Renenger (0.1); prepare reply memorandum of law (1.8); legal research for reply memorandum of law (0.8); review opposition briefs from Citibank, the Lenders, and USAV (1.0); e-mails to M. Scheck & J. Harap regarding reply memorandum of law (0.5); legal research regarding temporary restraining orders (0.2); prepare e-mail regarding same (0.2); e-mail to M. Scheck regarding Neuhauser declaration (0.1); e-mails to J. Tecce regarding Collections (0.2); prepare spreadsheet regarding Collections (0.6); e-mail to R. Mccausland regarding Arrubla Declaration (0.1); e-mails to Word Processing regarding new exhibit (0.3); prepare amended exhibit list and e-mail regarding same (0.2); prepare exhibits and demonstratives for hearing (0.4); confer with J. Tecce and others regarding hearing (0.8); confer with J. Tecce and others regarding reply memorandum of law (0.8); coordinate midnight filings (0.5).	12.90	12,835.50
10/20/20	CG3	Prepare materials for hearing (0.6); coordinate logistics of same (0.2).	0.80	284.00
10/20/20	EJ2	E filed the following in Southern District Bankruptcy: Notice of Adjournment of Hearing dated October 21, 2020 (.3).	0.30	121.50

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10/20/20	MRS	Preparation for and attending TRO hearing, including analysis of USAV Lenders' opposition brief, and follow up discussion with team regarding TRO hearing (5.8); outlining TRO reply brief, research related to same, and conferring internally regarding the same (2.4).	8.20	9,020.00
10/20/20	JCT	Prepare for TRO application hearing with review of leading authorities and revisions of talking points, presentation (3.7); emails with Chambers regarding hearing (.2); review pleadings filed by Lenders, USAV, Citibank (1.4); attend call with team (Newman, Scheck, Goralnik) and Milbank (Reneger, Dexter) regarding same, hearing preparation (1.0); call with Arrubla re hearing (.3); attend hearing on TRO application (3.2); calls w/ Newman and Scheck and Goralnik re next steps (.6); review settlement proposal, call with Citibank, email to client (.3); revise riders for reply (.4); revise argument outline (.3); call w/Committee counsel (.1); review settlement proposal, emails with client and parties re same, call w/Newman re same (1.3); draft reply rider (.5); outline closing argument (1.0).	14.30	18,947.50
10/20/20	DN6	Review objections to stay relief (2.9); Call regarding same (1); Hearing regarding same; Call regarding reply brief (3.2); Confer with J. Tecce regarding proposed settlement (.6).	9.20	11,040.00
10/21/20	JH1	Legal research (1.4); prepare brief (1.4); read agreements and related TRO materials (1.7).	4.50	4,162.50
10/21/20	NG1	Prepare proposed order (1.7); review and revise proposed order (0.4); e-mails to J. Tecce & D. Newman regarding same (0.2); legal research and e-mails regarding separate-entity	9.50	9,452.50

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		rule with respect to London accounts (1.7); e-mails regarding same (0.2); prepare reply memorandum of law in further support of motion (4.1); legal research for same (1.0); e-mails regarding same (0.4); e-mails regarding hearings (0.1).		
10/21/20	MRS	Conferring internally regarding TRO reply brief, research related to same, and drafting portions of the same (2.1).	2.10	2,310.00
10/21/20	JCT	Review case law for reply (.2); review settlement next steps, options (.5); call w/Kurtz re same (.2); email to Court re same (.2); review next steps with Goralnik and Newman (.3).	1.40	1,855.00
10/21/20	DN6	Review agreements (1); Confer with J. tecce regarding settlement (.3); Calls with G. Kurtz and S. Korpus (1).	2.30	2,760.00
10/22/20	JCT	Comment on USAV stay litigation pleading re Additional Purchase Price litigation (0.3).	0.30	397.50
10/22/20	DN6	Review Objections and related documents (4.2).	4.20	5,040.00
10/23/20	MRS	Internal call regarding discovery and related issues (0.3).	0.30	330.00
10/23/20	NG1	E-mail to J. Wolf regarding discovery (0.1); e-mails to J. Tecce regarding proposed order (0.1); e-mail to M. Scheck regarding document collection (0.1); review and revise proposed order (0.6); e-mail to opposing counsel regarding proposed order (0.1); correspondence (0.6); prepare discovery requests (2.0).	3.60	3,582.00
10/23/20	DN6	Review Objections and related documents; Call regarding next steps (2.3).	2.30	2,760.00
10/23/20	JCT	Review scheduling and revise proposed order re same (.5); call with	0.70	927.50

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		Scheck, Newman re same (.2).		
10/24/20	NG1	Prepare discovery requests (2.8); e-mails to J. Tecce & C. Garvey (0.1).	2.90	2,885.50
10/26/20	NF3	Spoke to attorney re Procedure for ordering transcript from transcription company for hearing before Judge Glenn, and provided link for order form, SDNY BK. (N. Goralnik) (.5)	0.50	202.50
10/26/20	CG3	Analyze and process recent case filings and transcript to share drive (0.2); circulate transcript to team (0.1).	0.30	106.50
10/26/20	JCT	Review emails from Milbank (Fleck), Seabury re Court inquiry on USAV issues, next steps (.2); revise draft document requests (.5).	0.70	927.50
10/26/20	NG1	Confer with J. Wolf regarding discovery (0.3); e-mails to C. Garvey & N. Ficorelli regarding hearing transcript (0.1); e-mails with E. Fleck regarding proposed order (0.2); e-mails to J. Tecce regarding discovery (0.1).	0.70	696.50
10/27/20	DN6	Review document requests; Confer with J. Tecce regarding same; Call regarding court conference; Emails regarding amendment (3.7).	3.70	4,440.00
10/27/20	JCT	Revise document demands (1.0); outline discovery next steps and email to Goralnik re same (.2); conf w/D. Newman re status (.2); further emails with team on discovery (.2); attend hands-on call with Milbank, company re hearing (.7).	2.30	3,047.50
10/27/20	NG1	E-mails to M. Scheck regarding discovery (0.2); prepare draft amended complaint (1.2); legal research regarding contempt proceedings for willful stay violation (1.1); e-mails to J. Tecce & D. Newman regarding contempt proceedings (0.2); review and revise discovery requests (1.7); review	6.20	6,169.00

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		comments on discovery requests (0.1); serve discovery requests (0.1); e-mail to L. Avila regarding discovery requests (0.1); e-mails to A. Renenger regarding discovery requests (0.1); settlement communications regarding proposed order (0.2); prepare requests for production to USAV (1.2).		
10/27/20	MRS	Call with client and co-counsel regarding court conference and related issues (0.8).	0.80	880.00
10/28/20	JCT	Prepare for (1.5) and attend (.6) hearing with bankruptcy court on adversary proceeding, scheduling, mediation; post hearing conferences with Milbank and company (.6), QE team (.3) on next steps; review entered order (.1).	3.10	4,107.50
10/28/20	NG1	E-mail to J. Tecce regarding mediation (0.1); conference calls with E. Fleck & J. Tecce (0.8).	0.90	895.50
10/28/20	DN6	Team call regarding court conference (.2).	0.20	240.00
10/29/20	JCT	Review submission materials for mediation (.7); emails with Milbank, Goralnik, Scheck to coordinate same (.1); review emails to Mediation parties and Mediation Order (.5).	1.30	1,722.50
10/29/20	NG1	E-mails to J. Tecce, D. Newman & M. Scheck regarding mediation (0.1); e-mail to co-counsel regarding mediation exhibits (0.1); document review for mediation exhibit list (0.2).	0.40	398.00
10/30/20	JCT	Review emails among Milbank, mediation participants re participation issues, order (0.4).	0.40	530.00
10/30/20	NG1	Prepare mediation statement (4.1); e-mails to J. Tecce regarding mediation statement (0.1); e-mails to J. Wolf regarding Trigger Event notice (0.1).	4.30	4,278.50

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10/31/20	NG1	Prepare mediation statement and legal research for same (4.0); e-mail to J. Tecce regarding same (0.1).	4.10	4,079.50
SUBTOTAL			381.30	421,898.50

## Fee Summary

Attorneys	Init.	Title	Hours	Rate	Amount
K. John Shaffer	KJS	Partner	3.10	1,595.00	4,944.50
James C. Tecce	JCT	Partner	112.60	1,325.00	149,195.00
Deborah Newman	DN6	Partner	57.10	1,200.00	68,520.00
Matthew R. Scheck	MRS	Partner	54.60	1,100.00	60,060.00
Nathan Goralnik	NG1	Associate	104.50	995.00	103,977.50
Jordan Harap	JH1	Associate	32.90	925.00	30,432.50
Zachary Russell	ZR1	Associate	4.50	875.00	3,937.50
Christopher Clark	CC4	Attorney	0.10	380.00	38.00
Case Assistants	Init.	Title	Hours	Rate	Amount
Nicholas Ficorelli	NF3	Managing Clerk	2.50	405.00	1,012.50
Eugenia Jones	EJ2	Managing Clerk	0.90	405.00	364.50
Caitlin Garvey	CG3	Paralegal	14.30	355.00	5,076.50
Eric Passaglia	EP	Paralegal	0.50	355.00	177.50

## Expense Summary

Description	Amount
Outside record production	163.20
Online Research	0.00
Document Reproduction	0.10 18.30
Word processing	0.00
Translation	900.00
Document Services	95.46
Conference Fee	70.00
Total Expenses	\$1,246.96

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 BRUSSELS | SEATTLE | ZURICH | SHANGHAI | STUTTGART | PERTH |  
 SALT LAKE CITY |

### Current Invoice Summary

Matter Name : In re Avianca Holdings S.A., et al.

Matter #: 10239-00001

Bill Date: November 17, 2020

Invoice Number: 101-  
0000109661

Total Fees.....\$427,736.00  
 Expenses.....\$1,246.96  
 Total Due this Invoice.....\$428,982.96

**Payment Due By December 19, 2020**

### Account Summary

Balance Due from Previous Statement(s).....\$231,456.50  
 Total Balance Due.....\$660,439.46

### Current Account Summary

Date	Invoice No.	Month of Service	Amount Billed	Payments Applied	Outstanding Amount
10/19/20	101- 0000108672	September 2020	\$231,456.50	\$0.00	\$231,456.50
11/17/20	101- 0000109661	October 2020	\$428,982.96	\$0.00	\$428,982.96

**Please reference invoice number and send check to:**

**Quinn Emanuel Urquhart & Sullivan, LLP**

865 S. Figueroa St., 10th Floor  
 Los Angeles, CA 90017

**Or Wire funds**  
**to:**

City National Bank  
 555 South Flower St., 12th Floor  
 Los Angeles, CA 90071  
 Quinn Emanuel Urquhart & Sullivan, LLP  
 Deposit Account #210032347  
 1220-16066  
 CINAUS6L

**References:**

***Invoice number and client name / matter number please***

Tax ID# 95-4004138