

Hearing Date & Time: May 11, 2022 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: May 6, 2022 at 4:00 p.m. (prevailing Eastern Time)

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*Counsel for Debtors and Reorganized
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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

**REORGANIZED DEBTORS' SEVENTEENTH OMNIBUS
OBJECTION TO PROOFS OF CLAIM**

¹ The Debtors and Reorganized Debtors in these chapter 11 cases, and each Debtors' and Reorganized 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 Loyalty Bermuda Ltd. (N/A); AV Taca International Holdco S.A. (N/A); Aviacorp Enterprises 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 (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). The Debtors' and Reorganized Debtors' principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.



**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED
PROOFS OF CLAIM.**

**CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR
NAMES AND CLAIMS ON SCHEDULES 1 THROUGH 4 ATTACHED TO
THE PROPOSED ORDER.**

Avianca Holdings S.A. and its reorganized debtor affiliates in these proceedings (collectively, the “Reorganized Debtors”) hereby file this *Seventeenth Omnibus Objection to Proofs of Claim* (the “Objection”) pursuant to *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 (I) Establishing Claims Objection and Notice Procedures and (II) Granting Related Relief* [Docket No. 1179] (the “Claims Objection Procedures Order”). This Objection is supported by the *Declaration of Walt Brown in Support of the Debtors’ Seventeenth Omnibus Objection to Proofs of Claim* (the “Brown Declaration”), which is attached to this Objection as **Exhibit B**. By this Objection, the Reorganized Debtors object to, and seek to disallow, reduce, reclassify or otherwise modify, as applicable, the claims listed on **Schedules 1 through 4** to the proposed order attached to this Objection as **Exhibit A** (the “Disputed Claims”). In support of this Objection, the Reorganized Debtors respectfully state as follows:

Background

1. On May 10, 2020 (the “Initial Petition Date”), certain of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. On September 21, 2020 (together with the Initial Petition Date, as applicable to each Debtor, the “Petition Date”), each of AV Loyalty Bermuda Ltd. and Aviacorp Enterprises S.A. filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”).

2. The Debtors operated their businesses and managed their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until they effectuated

their emergence from bankruptcy on December 1, 2021. *See Notice of (I) Entry of Order Confirming Further Modified Joint Chapter 11 Plan of Avianca Holdings S.A. and Its Affiliated Debtors, (II) Occurrence of Effective Date, and (III) Final Deadlines for Filing Certain Claims* [Docket No. 2384]. The Debtors' chapter 11 cases were jointly administered pursuant to Bankruptcy Rule 1015(b) and the *Amended Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 73] and the *Order Directing Certain Orders in Chapter 11 Cases of Avianca Holdings S.A., et al Be Made Applicable to Subsequent Debtors* [Docket No. 1030].

3. On May 22, 2020, the United States Trustee for the Southern District of New York appointed an official committee of unsecured creditors (the "Committee"). *See Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 154]. No trustee or examiner was appointed in the cases.

4. Additional information regarding the Debtors' business, capital structure, and the circumstances leading to the filing of these cases is set forth in the *Declaration of Adrian Neuhauser in Support of the Debtors' Chapter 11 Petitions and First Day Orders* [Docket No. 20].

5. On November 16, 2020, the Court entered the *Order (I) Establishing Bar Dates for Filing Proofs of Claim, (II) Approving Proof of Claim Forms, Bar Date Notices, and Mailing and Publication Procedures, (III) Implementing Uniform Procedures Regarding 503(b)(9) Claims, and (IV) Providing Certain Supplemental Relief* [Docket No. 1180] that, among other things, established the following deadlines for filing proofs of claim in these cases: (a) January 20, 2021, at 11:59 p.m. (prevailing Pacific Time), for all entities (except for those specifically exempt) holding all types of claims against the Debtors that arose or are deemed to have arisen before the Petition Date; (b) February 5, 2021, at 11:59 p.m. (prevailing Pacific Time), for all governmental

units holding claims that arose or are deemed to have arisen prior to the Petition Date; (c) the later of (i) the General Bar Date, or (ii) the later of the date that is (x) thirty days after the date of entry of an order authorizing the rejection of a contract or lease, or (y) the applicable rejection date for claims relating to the Debtors' rejection of an executory contract or unexpired lease; and (d) the later of (i) the General Bar Date and (ii) thirty days after the date that Notice of Amended Schedules is served on the affected claimant for claims whose amount or characterization has changed in the amended schedules (the "Bar Dates"). On November 16, 2020, the Court entered the Claims Objection Procedures Order [Docket No. 1179], that established procedures for Debtors to object to multiple claims in a single objection.

6. On November 2, 2021, the Court entered the *Order (I) Confirming Further Modified Joint Chapter 11 Plan of Avianca Holdings S.A. and Its Affiliated Debtors and (II) Granting Related Relief* [Docket No. 2300] (such underlying chapter 11 plan, the "Plan"). The Plan became effective on December 1, 2021 (the "Effective Date") and the Debtors became the Reorganized Debtors as of the Effective Date. See *Notice of (I) Entry of Order Confirming Further Modified Joint Chapter 11 Plan of Avianca Holdings S.A. and Its Affiliated Debtors, (II) Occurrence of Effective Date, and (III) Final Deadlines for Filing Certain Claims* [Docket No. 2384]. Pursuant to Section VII.E of the Plan, the Reorganized Debtors may adjust or expunge from the claims register maintained by the Debtors' claims and solicitation agent (the "Claims Register") any claims that have been paid or satisfied without further action, order, or approval of the Court.

7. The Plan provides that the Reorganized Debtors shall serve and file any objections to proofs of claim (each, a "Proof of Claim") that have been filed against the Debtors on or before the date that is the latter of (a) 180 days after the Effective Date (i.e., May 31, 2022), pursuant to

Bankruptcy Rule 9006(a)(1)(C)) and (b) such later date as may be fixed by the Bankruptcy Court upon notice and a hearing.

8. The Reorganized Debtors and their advisors are comprehensively reviewing and reconciling all claims, including the Disputed Claims and the claims asserted in the Proofs of Claim filed in the Chapter 11 Cases. To date, the Claims Register indicates that approximately 4,038 proofs of claim (the “Proofs of Claim”) have been filed against the Reorganized Debtors. To determine the validity of the asserted claims, the Reorganized Debtors and their advisors are reviewing the claims asserted in the Proofs of Claim against the Reorganized Debtors’ books and records (the “Books and Records”). The Reorganized Debtors are objecting to 135 Proofs of Claim in this Objection.

Jurisdiction and Venue

9. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

10. The Reorganized Debtors respectfully request the Court to enter an order (the “Proposed Order”), substantially in the form attached hereto as **Exhibit A**, disallowing, reducing, reclassifying or otherwise modifying, as applicable, each Disputed Claim in the amounts provided on the schedules to the Proposed Order.

Basis for Relief Requested

11. Section 502(a) of the Bankruptcy Code provides that any claim for which a proof of claim has been filed shall be deemed allowed unless a party in interest objects. 11 U.S.C. § 502(a). As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim for the purposes of

section 502(a) of the Bankruptcy Code. See In re Allegheny Int'l, Inc., 954 F.2d 167, 173 (3d Cir. 1992). However, a proof of claim is entitled to the presumption of *prima facie* validity only until an objecting party produces evidence to negate such *prima facie* validity. See In re Avaya, Inc., 608 B.R. 366, 369-70 (Bankr. S.D.N.Y. 2019).

12. If an objection is filed, the court, upon notice and a hearing, must determine the validity and/or the amount of the asserted claim. See 11 U.S.C. § 502(b). Once the objecting party refutes an allegation critical to the claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence. Allegheny, 954 F.2d at 173. In other words, once the *prima facie* validity of a claim is rebutted, “it is for the claimant to prove his claim, not for the objector to disprove it.” In re Kahn, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

13. A debtor in possession has the duty to object to the allowance of any improperly asserted claim. 11 U.S.C. § 1106(a)(1). Section 502(b)(1) of the Bankruptcy Code provides that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor.” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007(d) and the Claims Objection Procedures Order permit the Debtors to file an objection to more than one claim on non-substantive bases, such as, e.g., because such claims “have been satisfied” (Fed. R. Bankr. P. 3007(d)(5); see also, Claims Objection Procedures Order at ¶ 2), such claims are “incorrectly classified” (Claims Objection Procedures Order at ¶ 2(ii)), “do[] not include sufficient documentation to ascertain the validity of the claim” (Claims Objection Procedures Order at ¶ 2(iv)), “the amount claimed is inconsistent with or contradicts the Debtors’ books and records and the Debtors, after review and consideration of any information provided by the claimant, deny liability in excess of the amount reflected in the Debtors’ books and records” (Claims Objection Procedures Order at ¶ 2(a)(i), the claim “fails to

specify the asserted claim amount” (Claims Objection Procedures Order at ¶ 2(a)(vi)), or the claim was “filed against non-debtors” (Claims Objection Procedures Order at ¶ 2(a)(vii)).

14. **Satisfied Claims.** Based on the review of their claims register, the Reorganized Debtors have determined that the claims listed on **Schedule 1** to the Proposed Order (the “Satisfied Claims”) have been paid or otherwise satisfied by the Reorganized Debtors after the Petition Date. Failure to disallow the Satisfied Claims could result in each relevant claimant receiving an unwarranted recovery against the Reorganized Debtors’ estates, to the detriment of other similarly situated creditors. To avoid the possibility of multiple recoveries by such claimants, the Reorganized Debtors respectfully request that the Court disallow each Satisfied Claim listed on **Schedule 1** to the Proposed Order and expunge it from the Reorganized Debtors’ claims register.

15. **Reduced Claims.** Based on their review of the Reduced Claims and any documentation provided therewith, the Reorganized Debtors have determined that each claim listed on **Schedule 2** to the Proposed Order (the “Reduced Claims”) (1) seeks to recover amounts in excess of what is reflected on the Reorganized Debtors’ Books and Records, (2) contains withholding tax amounts, while the Reorganized Debtors have paid the withholding taxes they owe to the appropriate tax entities, (3) is not fully supported by sufficient documentation, (4) has been paid or otherwise satisfied in part, and/or (5) contains amounts asserted against Avianca Peru, a non-debtor entity. In order to preserve the integrity and accuracy of the Claims Register, and to avoid claimants improperly receiving recoveries in excess of what they are entitled to at the expense of the Reorganized Debtors and other creditors, the Reorganized Debtors respectfully request that the Court reduce the Reduced Claims listed on **Schedule 2** to the Proposed Order such that each Reduced Claim corresponds with the amount listed on **Schedule 2** under “Modified Claim Amount.”

16. This Court has previously granted similar relief in these chapter 11 cases. See Order Granting the Reorganized Debtors' Twelfth Omnibus Objection to Proofs of Claim [Docket No. 2509].

17. **No Liability Claims.** The Reorganized Debtors have also determined that each claim listed on **Schedule 3** to the Proposed Order (the “No Liability Claims”) represents a claim for which the Reorganized Debtors believe they are not liable. The Reorganized Debtors have determined that each No Liability Claim asserts amounts for (1) cancelled letters of credit, (2) surety bonds for which the Reorganized Debtors have no outstanding debt to the obligees, and/or (3) payment of services that were not provided to the Reorganized Debtors. As they are not liable for such amounts, the Reorganized Debtors respectfully request that the Court disallow each No Liability Claim listed on **Schedule 3** to the Proposed Order and expunge it from the Reorganized Debtors' claims register.

18. This Court has previously granted similar relief in these chapter 11 cases. See Order Granting the Reorganized Debtors' Eleventh Omnibus Objection to Proofs of Claim [Docket No. 2507].

19. **Multiple Modification Claims.** Based on the Reorganized Debtors' review of the Claims Register, they have determined that each claim listed on **Schedule 4** to the Proposed Order (the “Multiple Modification Claims”) is subject to more than one basis for reduction and/or reclassification. The particular basis for each claim's reduction and reclassification is set forth in **Schedule 4**, along with the amount of the claim which corresponds to each basis for modification. The claims listed in **Schedule 4** have been partially satisfied to the extent identified in the **Schedule 4**. Such claims have amounts that either the Reorganized Debtors could not confirm on their Books and Records and did not contain sufficient documentation for the Reorganized Debtors

to substantiate or that should be classified in the amount identified on Schedule 4 as general unsecured. A claimant asserting statutory priority, including administrative expense claim priority, bears the burden of establishing the claim's entitlement to such priority. See, e.g., In re Bethlehem Steel Corp., 479 F.3d 167, 172 (2d Cir. 2007) ("The burden of proving entitlement to priority payment as an administrative expense . . . rests with the party requesting it."); In re Drexel Burnham Lambert Grp. Inc., 134 B.R. 482, 489 (Bankr. S.D.N.Y. 1991) ("The burden of establishing entitlement to priority rests with the claimant and should only be granted under extraordinary circumstances, to wit, when the parties seeking priority have sustained their burden of demonstrating that their services are actual and necessary to preserve the estate.") (quotation omitted). Moreover, statutory priorities under the Bankruptcy Code are to be construed and awarded narrowly and consistent with the intent of the Bankruptcy Code. See, e.g., Howard Delivery Serv. v. Zurich Am. Ins. Co., 547 U.S. 651, 667, 669 (2006) (noting the longstanding principle that administrative claims "must be tightly construed" to accomplish the Bankruptcy Code's objective of equal distribution to creditors).

20. Section 503(b)(9) of the Bankruptcy Code provides for the allowance as an administrative expense of the value of any goods sold to the debtors in the ordinary course of the debtors' businesses and received by the debtors within 20 days before the Petition Date.² 11 U.S.C. § 503(b)(9). Thus, a claim that asserts administrative status under section 503(b)(9) is invalid to the extent it (1) asserts a claim for services or other nontangible items rather than goods or (2) asserts a claim for goods that were delivered to the debtors outside of the 20-day period section 503(b)(9) provides.

² The 20-day period for all relevant Debtors ran from April 20, 2020, forward to the Petition Date (May 10, 2020).

21. If a creditor cannot demonstrate that its claim is secured by a valid, perfected lien or other security interest in property of the Debtors' estates, or if the claim invalidly asserts administrative expense status under section 503(b)(9), it must follow that such a claim is unsecured. See, e.g., In re Dairy Mart Convenience Stores, Inc., 351 F.3d 86, 91 (2d Cir. 2003) (finding that a creditor that is a beneficiary of a letter of credit is only an unsecured creditor vis-à-vis the bankruptcy estate without a direct security interest); In re WorldCom, Inc., 362 B.R. 96, 120 (Bankr. S.D.N.Y. 2007) (reclassifying a purportedly secured claim as unsecured because it was based on a lapsed lien).

22. The Reorganized Debtors have determined that a portion the claim of Safran Aircraft Engines, as identified on **Schedule 4**, should be reclassified as a general unsecured claim because it invalidly asserts administrative status under section 503(b)(9). Additionally, the Reorganized Debtors have determined that the other claimants identified on **Schedule 4** have failed to allege sufficient facts and have not provided documentation sufficient to support their claims. Therefore, their claims are not *prima facie* valid. See, e.g., Allegheny, 954 F.2d at 173 (“[T]he claimant must allege facts sufficient to support the claim. If the averments in [the claimant’s] filed claim meet this standard of sufficiency, it is ‘prima facie’ valid.”) (internal citations omitted). Therefore, the Reorganized Debtors respectfully request that the Court enter the Proposed Order reducing and reclassifying each Multiple Modification Claim listed on **Schedule 4** to the Proposed Order as set out on such Schedule.

23. This Court has previously granted similar relief in these chapter 11 cases. See Order Granting the Reorganized Debtors’ Twelfth Omnibus Objection to Proofs of Claim [Docket No. 2509].

Separate Contested Matter

24. Each objection to the Disputed Claims constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Reorganized Debtors request that the order entered with respect to this Objection be deemed a separate final order with respect to each Disputed Claim.

Responses to Objections

25. For any claimant who timely files and properly serves a response to this Objection (each, a “Response”) as set forth in *Notice of Hearing on Reorganized Debtors’ Seventeenth Omnibus Objection to Proofs of Claim*, attached as **Exhibit C**, the Debtors will schedule such Response to be heard at the omnibus hearing at which this Objection will be heard, which is scheduled for May 11, 2022 at 10:00 a.m. (prevailing Eastern Time).

26. To the extent no Response is timely filed with respect to a Disputed Claim, the Reorganized Debtors request that the Court enter an order disallowing or reducing, as applicable, all such Disputed Claims.

Notice

27. Notice of this Objection has been provided to all claimants whose proofs of claim are the subject of the Objection, the Office of the U.S. Trustee, and all other parties entitled to notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that no other or further notice need be given.

Reservation of Rights

28. The Reorganized Debtors reserve the right to modify, supplement and/or amend this Objection as it pertains to any claim identified herein.

No Prior Request

29. No prior request for the relief sought in this Objection has been made to this or any other court.

[Remainder of page intentionally left blank]

WHEREFORE, the Reorganized Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: New York, New York
April 6, 2022

/s/ Evan R. Fleck

Dennis F. Dunne

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Counsel for Debtors and Reorganized Debtors

Exhibit A to Seventeenth Omnibus Claims Objection

Proposed Order

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

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In re:	:	Chapter 11
	:	
AVIANCA HOLDINGS S.A., <i>et al.</i> , ¹	:	Case No. 20-11133 (MG)
	:	
Debtors and Reorganized Debtors.	:	(Jointly Administered)
	:	
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**ORDER GRANTING THE REORGANIZED DEBTORS' SEVENTEENTH OMNIBUS
OBJECTION TO PROOFS OF CLAIM**

Upon the *Reorganized Debtors' Seventeenth Omnibus Objection to Proofs of Claim* (the "Seventeenth Omnibus Claims Objection"),² whereby the Reorganized Debtors have requested, in accordance with sections 105 and 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and the *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 (I) Establishing Claims Objection and Notice Procedures and (II) Granting Related Relief* [Docket No. 1179], entry of an order disallowing and expunging the claims identified on the Schedules hereto; and it appearing that the relief requested is in the best interests of the Reorganized Debtors' estates, their creditors and other parties in interest; and the Court having jurisdiction to consider the Seventeenth Omnibus

¹ The Debtors and Reorganized Debtors in these chapter 11 cases, and each Debtors' and Reorganized 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 Loyalty Bermuda Ltd. (N/A); AV Taca International Holdco S.A. (N/A); Aviacorp Enterprises 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 (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). The Debtors' and Reorganized Debtors' principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.

² Capitalized terms not otherwise defined herein are shall be given the meanings ascribed to them in the Seventeenth Omnibus Claims Objection.

Claims Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Seventeenth Omnibus Claims Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Seventeenth Omnibus Claims Objection having been adequate and appropriate under the circumstances; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Seventeenth Omnibus Claims Objection is granted as set forth herein.
2. Each Satisfied Claim identified in **Schedule 1** attached hereto as fully satisfied is disallowed in its entirety for all purposes in these bankruptcy cases and shall be automatically expunged from the claims register maintained in these cases.
3. Each Reduced Claim identified in **Schedule 2** attached hereto is reduced and allowed to the extent set forth in **Schedule 2**.
4. Each No Liability Claim identified in **Schedule 3** attached hereto is disallowed in its entirety. Each Multiple Modifications Claim identified in **Schedule 4** attached hereto is reduced and reclassified to the extent and in the manner set forth in **Schedule 4**.
5. The Debtors and their claims agent are authorized to take all actions necessary to effectuate the relief granted in this Order, including updating the claims register to reflect to relief granted herein.
6. Any response to the Seventeenth Omnibus Claims Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
7. Except as provided in this Order, nothing in this Order shall be deemed (a) an admission or finding as to the validity of any claim against a Debtor, (b) a waiver of the right of the Reorganized Debtors to dispute any claim against any Debtor on any grounds whatsoever, at a

later date, (c) a promise by or requirement on any Debtor to pay any claim, or (d) a waiver of the rights of the Reorganized Debtors under the Bankruptcy Code or any other applicable law.

8. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____, 2022
New York, New York

THE HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY JUDGE

Schedule 1 to Order

Satisfied Claims

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
ACTIVOS S.A.	3253887	\$547.65	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ADDSYS TECNOLOGIAS INFORMATICAS LTDA	3258103	\$1,092.47	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
AERO CHARTER DE MEXICO, S.A. DE C.V.	3258114	\$109,485.72	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
AEROCALI S.A	3256270	\$1,660.82	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
AEROPUERTO INTERNACIONAL DE LA CIUDAD DE MEXICO, S.A. DE C.V.	3258117	\$68,503.94	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
AEROSERVICIOS ACM, SC	3258118	\$3,605.03	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
AEROSERVICIOS USA INC.	3255095	\$8,382.80	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

¹ See Seventeenth Omnibus Claims Objection at ¶14.

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
AGENCIA DE ADUANAS OBELIX LOGISTICA S.A. NIVEL 2	3253895	\$215.16	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
Agencias Universales S.A.	200	\$293,940.88	Aerovias del Continente Americano S.A. Avianca	All invoices paid
Agencias Universales S.A.	202	\$25,266.89	Avianca Costa Rica S.A	All invoices paid
AIR CARGO LOGISTIC EL SALVADOR S.A. DE C.V.	3258121	\$10,206.39	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
AKURO S.A.S.	3258100	\$1,051.25	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ALLIANZ SEGUROS DE VIDA S A	3255458	\$257.20	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ALLIANZ SEGUROS S.A	3255456	\$1,599.63	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
AUTONIZA S.A.	3256240	\$26,474.47	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
BESANA BUSINESS DEVELOPMENT S.A	3258139	\$9,500.71	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
BIOEQUIPMENTS & LUBRICANTS LTDA	3255102	\$407.51	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
CASH LOGISTICS SOCIEDAD ANONIMA	3254146	\$1,069.41	Avianca Costa Rica S.A	All scheduled amounts paid
CASTILLO SILVA JUAN DAVID	3255618	\$8.12	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
CENTRAL PARKING SYSTEM S.A.S.	3254065	\$126.09	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
CHAPARRO RODRIGUEZ DANIEL FRANCISCO	3255627	\$114.44	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
Cherokee Debt Acquisition, LLC	622	\$32,724.50	Servicios Aeroportuarios Integrados SAI S.A.S.	All invoices paid
CITY OF CHICAGO	3258145	\$50,257.09	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
CODENSA S.A. ESP	3254062	\$12.76	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
COLMEDICA MEDICINA PREPAGADA	3255459	\$887.63	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
COLONIAL LIFE	3258147	\$3,060.11	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
COLSAISA S.A.S.	3255088	\$1,969.32	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
COMPANIA DE LUBRICANTES SA	3255098	\$763.13	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
COMPULAVI, S.A. DE C.V.	3258148	\$7,680.07	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
COZEN O CONNOR	3258149	\$7,339.50	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
CRISTIAN CABRALES Y CI S.A.S	3255121	\$4,396.94	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
DAPAC SERVICES SAS	3253886	\$281.80	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
DEVIA GARCIA EDGAR	3256294	\$2,113.43	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
DEYSI MARIA GONZALEZ	590 ²	\$19,439.05	Servicios Aeroportuarios Integrados SAI S.A.S.	All invoices paid
Diplomat Wyndham Bogota	150 ²	\$35,270.49	Aerovias del Continente Americano S.A. Avianca	All invoices paid
DOTAEXPRESS SEGURIDAD SAS	3258107	\$1,621.21	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
DOTAKONDOR S.A.S	3258106	\$6,206.09	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ECOLCIN S.A.S.	3253880	\$222.86	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
EDWIN HOYOS GOMEZ ARQUITECTURA Y CONSTRUCCION	3254070	\$1,862.94	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

² Indicates the claim was converted to USD using the exchange rate as of market open on May 11, 2020. Claim may contain unliquidated and/or undetermined amounts.

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
EMPRESA DE MEDICINA INTEGRAL EMI SA	3255463	\$1,641.10	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
EMPRESARIALES SAS	3258085	\$108,689.44	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
EMPRESAS PUBLICAS DE MEDELLIN E.S.P	3254068	\$6.77	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ESCUELA DE AVIACION DREAM FLY SAS	3258096	\$794.01	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ESFERA COLOR LTDA	3256245	\$2,805.36	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
FABRICA DE AUTOPARTES COLOMBIANA S A S	3256262	\$441.95	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
FILTERS TRADING LTDA	3255093	\$1,577.56	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
Flite Line LLC	286	\$2,880.19	Servicios Aeroportuarios Integrados SAI S.A.S.	All invoices paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
FREMI COMUNICACION GRAFICA SAS	3256291	\$1,063.61	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
GARCIA GARCIA HENRY ALEXANDER	3255621	\$60.15	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
GENERAL AIR SERVICES GUATEMALA	3258162	\$85,085.13	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
GLOBAL SUPPLY MANAGEMENT S.A.S.	3258109	\$5,599.33	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
GODDARD CATERING GROUP BOGOTA LTDA.	3253975	\$111.56	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
GONZALEZ TOVAR SIBARES	3255613	\$16.38	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
IATA	3253891	\$2,822.34	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ILS CARGO CORP	568	\$15,251.64	Avianca Holdings S.A.	All invoices paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
INDUSTRIA AERONAUTICA Y ADHESIVOS, S.A. DE C.V.	3258170	\$9,980.21	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
INTECO S.A.S.-INSPECCION TECNICA AUTOMOTRIZ	3256263	\$49.68	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
INTEGRAL DE IMPERMEABLES INTEIMPER SAS	3258110	\$1,198.78	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
INTERASEO AEROPUERTO SAS ESP	3253885	\$2,840.93	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
INVERSIONES ANDINA DEL SUR SAS	3254033	\$687.16	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
INVERSORA DEL ORIENTE COLOMBIANO SA	3254044	\$26.50	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
LABORATORIO CLINICO COLMEDICOS IPS S.A.S	3256269	\$26,149.00	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
LACHE GUERRERO LEIDY LORENA	3255620	\$36.60	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
LLANTAS Y ARTEFACTOS DE HULE S.A DE C.V.	3258173	\$6,633.41	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
LONGPORT COLOMBIA LTDA	3255119	\$3,207.36	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
M S MANTENIMIENTO Y SERVICIOS S.A.S.	3256261	\$324.96	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MANRIQUE JUAN ALBERTO	3258087	\$5.02	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MAPFRE COLOMBIA VIDA SEGUROS S A	3255460	\$97.91	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MARITZA CAMPOS ADRIANA	3255614	\$30.51	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MASTER QUIMICA SAS	3258086	\$22,703.60	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MENZIES AVIATION COLOMBIA S.A.S.	3255123	\$1,036.97	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
METLIFE COLOMBIA SEGUROS DE VIDA SA	3255462	\$217.26	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MICROHOME SAS	3258104	\$9,753.13	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MONTEZ PEREZ MARLY	3255611	\$28.41	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
MUNDIAL DE GUANTES LIMITADA	3258090	\$769.87	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
OLIVARES SAIZ IVAN DARIO	3256250	\$350.71	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ORTIZ GONZALEZ Y ASOCIADOS, SAS	3258182	\$4,471.04	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
OSORIO CANTILLO PEDRO MANUEL	3253888	\$686.57	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
P.A. CONCESION TERMINALES AEROPORTUARIAS DE NORORIENTE	3256287	\$18.89	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
P.A. FIDUCIARIA BANCOLOMBIA S A SOCIEDAD FID. EL DORADO	3256288	\$50,644.99	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
P.A. FIDUCIARIA BANCOLOMBIA S.A. SOCIEDAD FID. NORORIENTE	3256289	\$6,942.53	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
PARRA MARULANDA GERMAN JUNIOR	3255623	\$27.59	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
PATINO RODRIGUEZ ANYURY DINALY	3255624	\$257.22	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
PAZ JARAMILLO HANS	3255612	\$63.76	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
PELLECER & ASOCIADOS	3258185	\$6,650.00	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
PROSEGUR VIGILANCIA Y SEGURIDAD PRIVADA LTDA	3258070	\$21.35	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
Puerta del Sur S.A.	89	\$13,026.65	Tampa Cargo S.A.S.	All invoices paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
RAMIREZ GARZON MARCO FIDEL	3254064	\$270.41	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
RAMIREZ SALGADO JOHANEX ALBERTH	3255625	\$5.57	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
RAMOS JHOVANNY	3255610	\$49.33	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
RECORDAR PREVISION EXEQUIAL TOTAL S.A.S.	3253896	\$1,160.10	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
REYCA SA	3255084	\$1,334.49	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ROJAS LESMES LIVIA IVONNE	3255619	\$1,593.82	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
ROMERO DE PINDRAY LUCETTE ELVIRA	3256281	\$1,432.65	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
RP MECANIZADOS SAS	3256246	\$983.87	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
Schenker Inc.	292	\$126,665.00	Avianca Holdings S.A.	All invoices paid
SECURITAS DE COLOMBIA S.A.	3258069	\$28.65	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
SEGUROS DE VIDA SURAMERICANA S.A.	3255461	\$1,908.53	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
SERVICIOS EDUCATIVOS INTERNACIONALES SAS	741 ²	\$4,907.08	Aerovias del Continente Americano S.A. Avianca	All invoices paid
Servincluidos Ltda	1233 ²	\$4,331.60	Aerovias del Continente Americano S.A. Avianca	All invoices paid
SERVI-PAS SAS	3256242	\$1,060.92	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
SERVIREPARAR SAS	3256244	\$919.18	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
SIERRA AVILA JOSE ARMANDO	3255617	\$31.57	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

² Indicates the claim was converted to USD using the exchange rate as of market open on May 11, 2020. Claim may contain unliquidated and/or undetermined amounts.

SATISFIED CLAIMS ¹				
Claimant's Name	Scheduled / Proof(s) of Claim to be Disallowed	Asserted / Scheduled Amount of Claim	Debtor Claim is Asserted / Scheduled Against	Reason for Disallowance
SOCIEDAD AEROPORTUARIA DE LA COSTA S.A	3256283	\$168.48	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
SOCIEDADES MULTIPLES LTDA	3256276	\$5,247.15	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
SODETRANS S.A.S	3258084	\$215.93	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
TDA LOGISTICS & SERVICES, S DE RL DE CV	3258081	\$32,548.00	Aero Transporte de Carga Union, S.A. de C.V.	All scheduled amounts paid
UCROS & ASOCIADOS ABOGADOS SAS	3253889	\$4,674.51	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
UNE EPM TELECOMUNICACIONES S.A E.S.P	3254069	\$93.53	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid
UNIDAD ADMINISTRATIVA ESPECIAL DE AERONAUTICA CIVIL	3256286	\$31,532.84	Servicios Aeroportuarios Integrados SAI S.A.S.	All scheduled amounts paid

Schedule 2 to Order

Reduced Claims

REDUCED CLAIMS ¹					
Claimant's Name	Claim & Debtor Claim Is Asserted Against	Claim Class Category	Asserted Claim Amount	Modified Claim Amount	Reason for Modification
Accenture Ltda.	Claim No. 1090 Avianca Costa Rica S.A	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$46,920.95	\$0.00 \$0.00 \$0.00 \$32,977.26	Claim amount reduced due to services not provided and withholding taxes asserted that are not owed to claimant
Accenture Ltda.	Claim No. 1106 Avianca-Ecuador S.A	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$39,100.61	\$0.00 \$0.00 \$0.00 \$26,222.75	Claim amount reduced due to services not provided and withholding taxes asserted that are not owed to claimant
Airbus SAS ²	Claim No. 1619 Aero Transporte de Carga Union, S.A. de C.V.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$74,770.45	\$0.00 \$0.00 \$0.00 \$24,653.82	Claim amount reduced by one invoice for service never received
AVIATION CHEMICAL SOLUTIONS INC	Claim No. 1200 Avianca, Inc.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$70,206.58	\$0.00 \$0.00 \$0.00 \$44,505.58	Claim amount reduced due to invoices paid
Barfield, Inc.	Claim No. 110 Taca International Airlines S.A.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$32,168.57	\$0.00 \$0.00 \$0.00 \$15,425.41	Claim amount reduced due to invoices paid
DOLPHIN EXPRESS S.A.	Schedule ID No. 3255118 Servicios Aeroportuarios Integrados SAI S.A.S.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$12,135.52	\$0.00 \$0.00 \$0.00 \$6,002.56	Claim amount reduced due to invoices paid
DULLES BAGGAGE SERVICES INC	Claim No. 3727 Aerovias del Continente Americano S.A. Avianca	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$16,242.26	\$0.00 \$0.00 \$0.00 \$9,474.45	Claim amount reduced due to portion of claim asserting amounts for services not provided

¹See Seventeenth Omnibus Claims Objection at ¶¶15-16.

²Indicates claim contains unliquidated and/or undetermined amounts.

REDUCED CLAIMS'					
Claimant's Name	Claim & Debtor Claim Is Asserted Against	Claim Class Category	Asserted Claim Amount	Modified Claim Amount	Reason for Modification
G4S FACILITY MANAGEMENT CIA LTDA	Claim No. 1237 Avianca-Ecuador S.A	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$170,552.44	\$0.00 \$0.00 \$0.00 \$140,710.22	Claim amount reduced due to invoices paid and interest amounts improperly included for a postpetition period where vendor was subject to an automatic stay
Hahn Air Lines GmbH	Claim No. 323 Taca International Airlines S.A.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$100,000.00	\$0.00 \$0.00 \$0.00 \$50,000.00	Claim amount reduced due to amounts asserted against Avianca Peru, a non-debtor entity
Hotelaria Internacional SA	Claim No. 464 Aerovias del Continente Americano S.A. Avianca	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$8,854.00	\$0.00 \$0.00 \$0.00 \$563.53	Claim amount reduced due to invoices paid
LASA SOCIEDAD DE APOYO AERONAUTICO S.A.	Schedule ID No. 3255125 Servicios Aeroportuarios Integrados SAI S.A.S.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$66,057.94	\$0.00 \$0.00 \$0.00 \$42,065.12	Claim amount reduced due to invoices paid
PLANTAS Y SOLDADORES ACDC S.A.S.	Schedule ID No. 3255104 Servicios Aeroportuarios Integrados SAI S.A.S.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$11,065.49	\$0.00 \$0.00 \$0.00 \$5,591.95	Claim amount reduced due to invoices paid
Safran Passenger Innovations LLC	Claim No. 2232 Taca International Airlines S.A.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$1,501,654.00	\$0.00 \$0.00 \$0.00 \$1,487,939.00	Claim amount reduced due to invoices paid
SAFRAN SEATS USA LLC	Claim No. 2233 Avianca, Inc.	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$295,769.45	\$0.00 \$0.00 \$0.00 \$215,440.35	Claim amount reduced due to invoices paid

REDUCED CLAIMS'					
Claimant's Name	Claim & Debtor Claim Is Asserted Against	Claim Class Category	Asserted Claim Amount	Modified Claim Amount	Reason for Modification
SOCIEDAD OPERADORA DE AEROPUERTOS CENTRO NORTE S.A	Schedule ID No. 3256285 Servicios Aeroportuarios Integrados SAI S.A.S.	Administrative Priority	\$0.00	\$0.00	Claim amount reduced due to invoices paid
		Secured	\$0.00	\$0.00	
		Priority	\$0.00	\$0.00	
		General Unsecured	\$11,800.41	\$249.94	
The Port Authority of New York and New Jersey	Claim No. 245 Avianca Holdings S.A.	Administrative Priority	\$0.00	\$0.00	Claim amount reduced due to invoices paid
		Secured	\$0.00	\$0.00	
		Priority	\$0.00	\$0.00	
		General Unsecured	\$334,913.55	\$151,594.51	
UNIVERSAL DE PRODUCTOS Y SERVICIOS LTDA UNIPRODUCTOS	Schedule ID No. 3256266 Servicios Aeroportuarios Integrados SAI S.A.S.	Administrative Priority	\$0.00	\$0.00	Claim amount reduced due to invoices paid
		Secured	\$0.00	\$0.00	
		Priority	\$0.00	\$0.00	
		General Unsecured	\$6,763.60	\$128.12	

Schedule 3 to Order

No Liability Claims

NO LIABILITY CLAIMS ¹				
Claimant's Name	Proof(s) of Claim to be Disallowed	Asserted Amount of Claim	Debtor Claim Is Asserted Against	Reason for Modification
Banco Davivienda S.A.	1749	\$746,657.88	Tampa Cargo S.A.S.	The company confirmed the Letters of Credit associated with this claim have been cancelled
Banco Davivienda S.A.	1756	\$140,708.86	Tampa Cargo S.A.S.	The company confirmed the Letters of Credit associated with this claim have been cancelled
Eirtech Aviation Services Ltd	1174	\$11,250.00	Aero Transporte de Carga Union, S.A. de C.V.	The company confirmed no services were ever provided by this claimant and no outstanding amounts could be found in their systems
JMalucelli Travelers Seguros S.A.	2157 ²	\$4,724,600.77	Aerovias del Continente Americano S.A. Avianca	The company confirmed there is no outstanding debt with the obligees of the surety bonds related to this claim
LITTLER MENDELSON, P.C.	899	\$25,067.25	Avianca Holdings S.A.	The company confirmed no services were ever provided by this claimant and no outstanding amounts could be found in their systems

¹ See Seventeenth Omnibus Claims Objection at ¶¶17-18.

² Indicates the claim was converted to USD using the exchange rate as of market open on May 11, 2020. Claim may contain unliquidated and/or undetermined amounts.

Schedule 4 to Order

Multiple Modification Claims

MULTIPLE MODIFICATION CLAIMS ¹								
Claimant's Name	Claim & Debtor Claim Is Asserted Against	Claim Class Category	Asserted Claim Amount	Reclassified Amount	Paid Amount	Books and Records Amount	Modified Claim Amount	Reason for Modification
Descartes Systems (USA) LLC	Claim No. 523 Tampa Cargo S.A.S.	Administrative Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Reduction due to invoices paid and others unable to be confirmed in company system with no corresponding proof of goods or services provided.
		Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		General Unsecured	\$47,242.06	\$0.00	(\$7,501.21)	(\$8,143.22)	\$31,597.63	
FedEx Corporate Services Inc.	Claim No. 215 Avianca, Inc.	Administrative Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Reduction due to invoices paid and others unable to be confirmed in company system with no corresponding proof of goods or services provided.
		Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		General Unsecured	\$504,016.36	\$0.00	(\$233,411.76)	(\$263,695.18)	\$6,909.42	
Safran Aircraft Engines	Claim No. 847 Avianca Holdings S.A.	Administrative Priority	\$7,881.00	(\$7,881.00)	\$0.00	\$0.00	\$0.00	Reduction due to invoices paid and reclassification due to amounts related to services, not goods.
		Secured	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		Priority	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
		General Unsecured	\$7,853.00	\$7,881.00	(\$3,167.00)	\$0.00	\$12,567.00	

¹See Seventeenth Omnibus Claims Objection at ¶¶19-23.

Exhibit B to Seventeenth Omnibus Claims Objection

Declaration of Walt Brown

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

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

**DECLARATION OF WALT BROWN IN SUPPORT OF REORGANIZED DEBTORS'
SEVENTEENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM**

I, Walt Brown, make this declaration pursuant to 28 U.S.C. § 1746 and state as follows:

Background

1. I am a managing director at FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”), an international consulting firm.

2. In my capacity as managing director, I am authorized to submit this declaration in support of the *Reorganized Debtors’ Seventeenth Omnibus Objection to Proofs of Claim* (the “Seventeenth Omnibus Claims Objection”).²

¹ The Debtors and Reorganized Debtors in these chapter 11 cases, and each Debtors’ and Reorganized 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 Loyalty Bermuda Ltd. (N/A); AV Taca International Holdco S.A. (N/A); Aviacorp Enterprises 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 (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). The Debtors’ and Reorganized Debtors’ principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.

² Capitalized terms used, but not otherwise defined, herein shall have the meanings set forth in the Seventeenth Omnibus Claims Objection.

3. All facts set forth herein are based on my personal knowledge, in evaluating the Proofs of Claim, the Reorganized Debtors and other reviewing parties have reviewed the Reorganized Debtors' Books and Records, the relevant Proofs of Claim, as well as the supporting documentation provided by the claimants, and determined that the Disputed Claims should be disallowed and expunged from the claims register maintained in these cases (the "Claims Register").

4. If I were called upon to testify, I could and would competently testify to each of the facts set forth herein on that basis, including that I, or employees of FTI under my supervision and direction, personally reviewed the claims listed in **Schedules 1 through 4** to the proposed *Order Granting Reorganized Debtors' Seventeenth Omnibus Objection to Proofs of Claim* (the "Proposed Order") as part of the claims reconciliation process in these chapter 11 cases.

Satisfied Claims

5. To the best of my knowledge, information, and belief, based on a review of the Claims Register and each of the Satisfied Claims, the Reorganized Debtors have determined that the Satisfied Claims listed on **Schedule 1** to Proposed Order have been paid or otherwise satisfied, either in full or in part, by the Debtors after the Petition Date. If the Satisfied Claims identified on **Schedule 1** to the Proposed Order are not disallowed or reduced, the claimants identified therein may improperly obtain double recovery from the same alleged liability, at the expense of the Reorganized Debtors and other creditors.

6. I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the Satisfied Claims as set forth therein and in the Objection.

Reduced Claims

7. To the best of my knowledge, information, and belief, based on a review of the Claims Register and each of the Reduced Claims, the Reorganized Debtors have determined that the Reduced Claims listed on **Schedule 2** to Proposed Order (1) seeks to recover amounts in excess of what is reflected on the Reorganized Debtors' Books and Records, (2) contains withholding tax amounts, while the Reorganized Debtors have paid the withholding taxes they owe to the appropriate tax entities, (3) is not fully supported by sufficient documentation, (4) has been paid or otherwise satisfied in part, and/or (5) contains amounts asserted against Avianca Peru, a non-debtor entity. The specific reason for the Reorganized Debtors' determination that each claim should be reduced and in what amount is identified in **Schedule 2** to the proposed Order. If the Reduced Claims identified on **Schedule 2** to the Proposed Order are not reduced, the claimants identified therein may improperly obtain an unwarranted recovery at the expense of the Reorganized Debtors and other creditors.

8. I believe it is proper for the Court to enter the Proposed Order reducing the Reduced Claims as set forth therein and in the Objection.

No Liability Claims

9. To the best of my knowledge, information, and belief, based on a review of the Claims Register and each of the No Liability Claims, the Reorganized Debtors have determined that each No Liability Claim asserts amounts for (1) cancelled letters of credit, (2) surety bonds for which the Reorganized Debtors have no outstanding debt to the obligees, and/or (3) payment for services that were not provided to the Reorganized Debtors. If the No Liability Claims identified on **Schedule 3** to the Proposed Order are not disallowed or reduced, the claimants

identified therein may improperly obtain an unwarranted recovery at the expense of the Reorganized Debtors and other creditors.

10. I believe it is proper for the Court to enter the Proposed Order disallowing and expunging the No Liability Claims as set forth therein and in the Objection.

Multiple Modification Claims

11. To the best of my knowledge, information, and belief, based on a review of the Claims Register and each of the Multiple Modification Claims, the Reorganized Debtors have determined that the Multiple Modification Claims listed on **Schedule 4** to Proposed Order is subject to more than one basis for reduction and reclassification. The particular basis for each claim's reduction and reclassification is set forth in **Schedule 4** to the Proposed Order, along with the amount of the claim which corresponds to each basis for modification. If the Multiple Modification Claims identified on **Schedule 4** to the Proposed Order are not reclassified or reduced, the claimants identified therein may improperly obtain an unwarranted recovery at the expense of the Reorganized Debtors and other creditors.

12. I believe it is proper for the Court to enter the Proposed Order reducing and reclassifying the Multiple Modification Claims as set forth therein and in the Objection.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: April 6, 2022

/s/ Walt Brown
Walt Brown
Managing Director
FTI Consulting, Inc.
2001 Ross Avenue, Suite 650
Dallas, TX 75201

Exhibit C to Seventeenth Omnibus Claims Objection

Notice of Objection

Dennis F. Dunne
Evan R. Fleck
Benjamin Schak
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Telephone: (212) 530-5000
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*Counsel for Debtors and Reorganized
Debtors*

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

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

**NOTICE OF HEARING ON THE REORGANIZED DEBTORS' SEVENTEENTH
OMNIBUS OBJECTION TO PROOFS OF CLAIM**

PLEASE TAKE NOTICE that, on April 6, 2022, the above-captioned debtors and debtors in possession (collectively, the "Debtors"), filed their Seventeenth Omnibus Objection to Proofs of Claim (the "Objection") with the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

¹ The Debtors and Reorganized Debtors in these chapter 11 cases, and each Debtors' and Reorganized 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 Loyalty Bermuda Ltd. (N/A); AV Taca International Holdco S.A. (N/A); Aviacorp Enterprises 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 (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). The Debtors' and Reorganized Debtors' principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.

THIS OBJECTION ADDRESSES ONE OR MORE OF THE CLAIM(S) YOU HAVE FILED IN THE REORGANIZED DEBTORS' CASES. Schedules 1 through 4 annexed to the Objection (attached hereto) (the "Schedules") identify your claim and the category of claim objection applicable to you. The complete Objection can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) free of charge from the Reorganized Debtors' notice and claims agent, KCC, at <http://www.kccllc.net/avianca> or by calling (866) 967-1780 (U.S./Canada) or +1 (310) 751-2680 (International). Note that a PACER password is needed to access documents on the Court's website. The complete Objection is entitled *Reorganized Debtors' Seventeenth Omnibus Objection to Proofs of Claim*.

The Objection requests that the Bankruptcy Court disallow and expunge one or more of your claims listed in the Schedules on the ground that the claim (i) has been paid or otherwise satisfied by the Debtors, in full or in part, after the Petition Date, (ii) should be reclassified, (iii) should be reduced, (iv) does not show a claim for a liability owed by the Debtors, (v) is supported by insufficient documentation, or (vi) is subject to multiple modifications. Any claim that the Bankruptcy Court expunges or disallows will be treated as if such claim had not been filed. Any claim that the Bankruptcy Court reduces or reclassifies will be treated as if such claim had been filed in the reduced amount or reclassified class.

If you DO oppose the disallowance, expungement, reduction, or reclassification of your claim(s) listed in the Schedules then you MUST file a written response to the Objection (the "Response") ON OR BEFORE MAY 6, 2022 AT 4:00 P.M. EASTERN TIME (the "Response Deadline") and serve such Response as set forth herein. If you DO NOT oppose the disallowance or expungement of your claim(s) listed in the Schedules then no further action is required by you.

The Response, if any, must include the following: (i) a caption identifying the name of the Bankruptcy Court, the names of the Reorganized Debtors, the case number and the title of the Objection to which the Response is directed; (ii) the name of the claimant and description of the basis for the claim; (iii) a short statement describing the reasons for which the claim should not be disallowed as set forth in the Objection; (iv) additional documentation or other evidence upon which you rely in opposing the Objection (if it was not included with the proof of claim previously filed with the Bankruptcy Court); (v) the address(es) to which the Reorganized Debtors must return any reply to your Response, if different from that presented in your proof of claim; (vi) the name, address, and telephone number of the person (which may be you or your legal representative) holding ultimate authority to resolve the claim on your behalf.

The Bankruptcy Court will consider a Response only if the Response is filed with the Court on or prior to the Response Deadline. All Responses must be served on (i) the Bankruptcy Court at Chambers of Honorable Judge Martin Glenn, One Bowling Green, New York, New York 10004-1408, (ii) counsel for the Reorganized Debtors at Milbank LLP, 55 Hudson Yards, New York, New York 10001 (Attn: Evan R. Fleck, Esq., Gregory A. Bray, Esq., and Benjamin Schak, Esq. (efleck@milbank.com, gbray@milbank.com, and bschak@milbank.com)), and (iii) the Reorganized Debtors, c/o Richard Galindo (richard.galindo@avianca.com).

A HEARING WILL BE HELD ON MAY 11, 2022 (the "Hearing") to consider the Objection. **THE HEARING WILL BE HELD AT 10:00 A.M. (EASTERN TIME)** at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room

523, New York, New York 10004 in front of the Honorable Martin Glenn. If you file a written Response to the Objection, you or your counsel must attend the Hearing (which attendance may be via Zoom for Government). In light of the COVID-19 pandemic, the Hearing may be conducted via Zoom for Government. Parties wishing to appear at the Hearing, whether in a “live” or “listen only” capacity, must make an electronic appearance through the “eCourtAppearances” tab on the Court’s website (<http://www.nysb.uscourts.gov/content/judge-martin-glenn>) no later than 4:00 p.m. (prevailing Eastern Time) the business day before the Hearing (the “Appearance Deadline”). Following the Appearance Deadline, the Court will circulate by email the Zoom link to the Hearing to those parties who have made an electronic appearance. Parties wishing to appear at the Hearing must submit an electronic appearance through the Court’s website by the Appearance Deadline and not by emailing or otherwise contacting the Court. The Court will not respond to late requests that are submitted on the day of the hearing. Additional information regarding the Court’s Zoom and hearing procedures can be found on the Court’s website. The Reorganized Debtors reserve the right to continue the Hearing on the Objection for your claim(s) at a later date.

If the Bankruptcy Court does NOT disallow, expunge, reduce, or reclassify your claim(s) listed in the Schedules then the Reorganized Debtors may object on other grounds to the claim(s) (or to any other claims you may have filed) at a later date. You will receive a separate notice of any such objection.

Dated: April 6, 2022
New York, New York

/s/ Evan R. Fleck
Dennis F. Dunne
Evan R. Fleck
Benjamin Schak
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- and -

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Counsel for Debtors and Reorganized Debtors