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

In re:

PHILIPPINE AIRLINES, INC.¹

Debtor.

Chapter 11

Case No. 21-11569 (SCC)

OMNIBUS CERTIFICATE OF NO OBJECTION

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”), and in accordance with the United States Bankruptcy Court’s case management procedures set forth in the *Order Implementing Certain Notice and Case Management Procedures*, entered on September 30, 2021 [ECF No. 124], the undersigned counsel for the above-captioned debtor and debtor-in-possession (the “**Debtor**”) hereby certifies as follows:

¹ The Debtor in this chapter 11 case, along with its registration number in the Philippines, is Philippine Airlines, Inc., Philippine Securities and Exchange Commission Registration No. PW 37. The Debtor’s corporate headquarters is located at PNB Financial Center, President Diosdado Macapagal Avenue, CCP Complex, Pasay City 1300, Metro Manila, Philippines.



1. On February 14, 2022, the Debtor filed the following final fee applications (collectively, the “**Final Fee Applications**”):

- *First Interim and Final Fee Application of Debevoise & Plimpton LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from September 4, 2021 Through and Including December 31, 2021* [ECF 375].
- *First and Final Fee Application of Norton Rose Fulbright US LLP and Norton Rose Fulbright LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtor for the Period September 4, 2021 Through December 31, 2021* [ECF 376].
- *First Interim and Final Fee Application of Seabury Securities LLC and Seabury International Corporate Finance LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor and Investment Banker to the Debtor and Debtor in Possession for the Period September 4, 2021 Through December 31, 2021* [ECF 377].
- *First Interim and Final Fee Application of Kurtzman Carson Consultants LLC as Administrative Advisor for the Debtor for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from September 4, 2021 Through and Including December 31* [ECF 378].

2. Local Rule 9075-2 provides that a motion or application may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the attorney for the entity that filed the motion or application complies with such rule.

3. The Final Fee Applications and the notice of hearing [ECF No. 379] were served on February 14, 2022 [ECF No. 380]. The objection deadline for the Final Fee Applications was March 7, 2022, at 5:00 p.m. (Prevailing Eastern Time) (the “**Objection Deadline**”).

4. As of the filing of this certificate, more than 48 hours have elapsed since the Objection Deadline and, to the best of my knowledge, no objection or other responsive pleading

to the Final Fee Applications have been (a) filed with the Court on the docket of the above-captioned chapter 11 case or (b) served on the Debtor or its counsel. While informal comments were received from the United States Trustee, those comments have been resolved as reflected in the form of proposed order attached hereto. As a result, any objections with respect to the Final Fee Applications have been fully resolved.

5. Accordingly, the Debtor respectfully requests entry of the proposed order granting the relief requested in the Final Fee Applications, annexed hereto as Exhibit A (the “**Proposed Order**”) at the Court’s earliest convenience.

6. If not entered prior to the hearing, the Debtor will seek entry of the Proposed Order at the hearing scheduled for 11:00 a.m., prevailing Eastern Time, on March 29, 2022, before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green New York, NY 10004.²

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

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² In light of the current COVID-19 pandemic, the hearing will be held telephonically.

Dated: March 15, 2022
New York, New York

DEBEVOISE & PLIMPTON LLP

By: /s/ Jasmine Ball
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Counsel to the Reorganized Debtor

Exhibit A

Proposed Order

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

In re:

PHILIPPINE AIRLINES, INC.,¹

Debtor.

Chapter 11

Case No. 21-11569 (SCC)

**OMNIBUS ORDER GRANTING FINAL FEE APPLICATIONS OF
CERTAIN PROFESSIONALS FOR ALLOWANCE OF PAYMENT OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
FOR REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES**

Upon consideration of the Applications² for allowance of final compensation for professional services rendered and reimbursement for expenses incurred during the period commencing September 4, 2021 through December 31, 2021; and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is **HEREBY ORDERED THAT:**

1. The Applications are granted to the extent set forth in the attached **Schedule A**.

¹ The Debtor in this chapter 11 case, along with its registration number in the Philippines, is Philippine Airlines, Inc. Philippine Securities and Exchange Commission Registration No. PW 37. The Debtor's corporate headquarters is located at PNB Financial Center, President Diosdado Macapagal Avenue, CCP Complex, Pasay City 1300, Metro Manila, Philippines.

² See *First Interim and Final Fee Application of Debevoise & Plimpton LLP for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from September 4, 2021 Through and Including December 31, 2021* [ECF 375]; *First and Final Fee Application of Norton Rose Fulbright US LLP and Norton Rose Fulbright LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Special Counsel to the Debtor for the Period September 4, 2021 Through December 31, 2021* [ECF 376]; *First Interim and Final Fee Application of Seabury Securities LLC and Seabury International Corporate Finance LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor and Investment Banker to the Debtor and Debtor in Possession for the Period September 4, 2021 Through December 31, 2021* [ECF 377]; and *First Interim and Final Fee Application of Kurtzman Carson Consultants LLC as Administrative Advisor for the Debtor for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from September 4, 2021 Through and Including December 31* [ECF 378].

2. The Debtor is authorized and directed to pay the Applicants' allowed compensation and expenses, less any amounts previously paid by the Debtor in connection with the compensation or expenses requested in the Applications.

3. The Applicants shall apply any remaining prepetition retainer as a credit toward the postpetition fees and expenses that are approved pursuant to this Order.

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

Dated: March __, 2022
New York, NY

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE

Case No. 21-11569 (SCC)

Case Name: In re Philippines Airlines, Inc.

SCHEDULE A

FINAL FEE APPLICATION TOTALS
SEPTEMBER 4, 2021 THROUGH AND INCLUDING DECEMBER 31, 2021

(1) Applicant	(2) Date / Document Number of Application	(3) Total Fees Requested	(4) Total Fees Allowed ¹	(5) Total Expenses Requested	(6) Total Expenses Allowed ²
Debevoise & Plimpton LLP	February 14, 2022 [Docket No. 375]	\$2,099,466.00	\$2,098,835.00	\$10,851.42	\$10,851.42
Norton Rose Fulbright US LLP and Norton Rose Fulbright LLP	February 14, 2022 [Docket No. 376]	\$1,235,138.83	\$1,230,887.98	\$1,914.97	\$1,914.97
Seabury Securities LLC and Seabury International Corporate Finance LLC	February 14, 2022 [Docket No. 377]	\$5,497,644.58	\$5,497,644.58	\$1,394.58	\$1,307.58
Kurtzman Carson Consultants, LLC	February 14, 2022 [Docket No. 378]	\$102,525.60	\$102,525.60	\$0.00	\$0.00

¹ This column reflects fees requested on the Application less amounts that the Applicants agreed to waive to resolve comments from the U.S. Trustee.

² This column reflects expenses requested on the Application less amounts that the Applicants agreed to waive to resolve comments from the U.S. Trustee.