

**Hearing Date and Time: September 23, 2020, at 11:00 a.m. (Prevailing Eastern Time)**

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and Debtors-in-Possession and  
the Subsequent Debtors and  
Debtors-in-Possession*

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

In re:

LATAM Airlines Group S.A., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No.: 20-11254

Jointly Administered

**AMENDED AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON SEPTEMBER 23, 2020 AT 11:00 A.M.**

<sup>1</sup> The Debtors filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s tax identification number are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services, LLC (30-1133972); Maintenance Service Experts, LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); Latam Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corredora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street, Miami, Florida 33131.

**Time and Date of Hearing:** September 23, 2020 at 11:00 a.m. (Prevailing Eastern Time)

**Location of Hearing:** The Honorable Judge Garrity, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004. In light of COVID-19, the hearing will only be conducted telephonically. Parties wishing to participate in must make arrangements through CourtSolutions LLC ([www.court-solutions.com](http://www.court-solutions.com)). The filing and service deadline of any objections or responses to entry of a final order is listed below for each motion and application.

**Copies of Motions:** Copies of the pleadings can be viewed and/or obtained by: (i) accessing the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), or (ii) from the Debtors' notice and claims agent, Prime Clerk LLC, located at One Grand Central Place, 60 East 42<sup>nd</sup> Street, Suite 1440, New York, New York 10165, at <https://cases.primeclerk.com/LATAM> or by calling +1 212 257 5450. Note that a PACER password is needed to access documents on the Court's website.

**I. STATUS CONFERENCE:**

**1. Case Conference**

**II. UNCONTESTED MATTERS**

**1. Motion to Extend Time To Remove Proceedings.** *Debtors' Motion for Entry of an Order Pursuant to Fed. R. Bankr. P. 9006(b) and 9027 Enlarging Time Within Which to File Notices of Removal or Related Proceedings.* ECF No. 920.

**i. Response Deadline:** September 16, 2020 at 4:00 P.M.

**ii. Responses Received:** None

**iii. Related Documents:**

**1. Omnibus Certificate of No Objection.** ECF No. 1094.

**iv. Status:** This matter is going forward on an uncontested basis.

**2. Motion to Extend Time To Assume or Reject Leases.** *Motion of Debtors to Extend the Initial Period to Assume or Reject Unexpired Nonresidential Real Property Leases Pursuant to §365(d)(4).* ECF No. 1002.

- i. **Response Deadline:** September 16, 2020 at 4:00 P.M.
      - ii. **Responses Received:**
        1. *Informal comments from counsel to Aero Miami I, LLC.*
      - iii. **Related Documents:**
        1. *Omnibus Certificate of No Objection.* ECF No. 1094.
      - iv. **Status:** Being that no formal responses or objections received and all informal comments have been resolved, a proposed order has been submitted, the matter is going forward on an uncontested basis.
    3. **Bar Date Motion.** *Debtors' Application for an 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.* ECF No. 1004.
      - i. **General Response Deadline:** September 16, 2020 at 4:00 P.M.
      - ii. **UCC and Parties' Represented by Clifford Chance LLP Response Deadline:** September 18, 2020 at 4:00 P.M.
      - iii. **Responses Received:**
        - a. *Informal Comments received from the UCC, Ad Hoc Group, and parties represented by Clifford Chance LLP, Vedder Price LLP, Milbank LLP, and Duane Morris LLP.*
      - iv. **Related Documents:**
        1. *Notice of Revised Proposed Orders Pursuant to the Application to Establish Bar Dates and the Motion to Extend the Exclusivity Periods.* ECF No. 1088.
      - v. **Status:** This matter is going forward on an uncontested basis.
    4. **Motion to Extend Exclusivity Period.** *Debtors' Motion for Entry of Order Extending the Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and Solicit Acceptances Thereof and Granting Related Relief.* ECF No. 1005.
      - i. **Response Deadline:** September 16, 2020 at 4:00 P.M.
      - ii. **Responses Received:**
        - a. *Informal Comments received from the UCC and the Ad Hoc Group.*

**iii. Related Documents:**

1. *Notice of Revised Proposed Orders Pursuant to the Application to Establish Bar Dates and the Motion to Extend the Exclusivity Periods.* ECF No. 1088.

**iv. Status:** This matter is going forward on an uncontested basis.

5. **Motion to Purchase Aircraft.** *Debtors' Motion for an Order Authorizing the Debtors to Purchase Certain Aircraft and Enter Into Lease Amendments and Related Agreements.* ECF No. 1006.

**i. Response Deadline:** September 16, 2020 at 4:00 P.M.

**ii. Responses Received:** None

**iii. Related Documents:**

1. *Omnibus Certificate of No Objection.* ECF No. 1094.

**iv. Status:** This matter is going forward on an uncontested basis.

6. **Motion to Authorize Aircraft Rejection Procedures.** *Debtors' Motion for an Order Authorizing Procedures for the Rejection of Certain Unexpired Aircraft Lease Agreements, Aircraft Engine Agreements, and the Abandonment of Certain Related Assets.* ECF No. 1051.

**i. Response Deadline:** September 18, 2020 at 4:00 P.M.

**ii. Responses Received:**

- a. *Informal comments received from the UCC, the Ad Hoc Group, and parties represented by Vedder Price, Clifford Chance LLP, Allen & Overy LLP, Winston & Strawn LLP, Holland & Knight LLP, Pillsbury Winthrop Shaw Pittman LLP.*

**iii. Related Documents:**

1. *Notice of the Debtors' Revised Order Authorizing Procedures for the Rejection of Certain Unexpired Aircraft Lease Agreements, Aircraft Engine Agreements, and the Abandonment of Certain Related Assets.* ECF No. 1087.

**iv. Status:** This matter is going forward on an uncontested basis.

7. **Application to Retain Ferro, Castro Neves, Daltro & Gomide Avogados.** *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Retention and Employment of Ferro, Castro Neves, Daltro & Gomide Avogados as Brazilian Counsel, Effective as of August 4, 2020.* ECF

No. 1048.

- i. Response Deadline:** September 16, 2020 at 4:00 P.M.
  - ii. Responses Received:** None
  - iii. Status:** This matter is going forward on an uncontested basis.
  
8. **Application to Retain Ernst & Young.** *Debtors' Application for an Order Authorizing the Retention and Employment of Ernst & Young Auditores Independentes S.S. as Auditors of the Brazilian Debtors, Nunc Pro Tunc to July 9, 2020.* ECF No. 1050.
  - i. General Response Deadline:** September 16, 2020 at 4:00 P.M.
  - ii. US Trustee Response Deadline:** September 17, 2020 at 12:00 P.M.
  - iii. Responses Received:** None
  - iv. Related Documents:**
    1. *Omnibus Certificate of No Objection.* ECF No. 1094.
  - v. Status:** This matter is going forward on an uncontested basis.
  
9. **Motion to Retain Lee, Brock, Camargo Advogados.** *Debtors' Application for an Order Authorizing Employment and Retention of Lee, Brock, Camargo Advogados as Local Brazilian Litigation Counsel for the Debtors Nunc Pro Tunc to the Subsequent Petition Date.* ECF No. 1054.
  - i. Response Deadline:** September 16, 2020 at 4:00 P.M.
  - ii. Responses Received:** None
  - iii. Related Documents:**
    1. *Omnibus Certificate of No Objection.* ECF No. 1094.
  - iv. Status:** This matter is going forward on an uncontested basis.
  
10. **Motion to Amend the Final Cash Management Order.** *Debtors' Motion to Amend Final Order (I) Authorizing Continued Use of Cash Management System, (II) Authorizing the Continuation of Intercompany and Affiliate Transactions, (III) Granting Administrative Priority Status to Postpetition Intercompany and Applicable Affiliate Claims, (IV) Waiving Compliance with Restrictions Imposed by Section 345 of the Bankruptcy Code, and (V) Authorizing Continued Use of Prepetition Bank Accounts, Payment Methods and Existing Business Forms.* ECF No. 1052.

- i. **Response Deadline:** September 16, 2020 at 4:00 P.M.
- ii. **Responses Received:** None
- iii. **Related Documents:**
  1. *Final Order (I) Authorizing Continued Use of Cash Management System, (II) Authorizing the Continuation of Intercompany and Affiliate Transactions, (III) Granting Administrative Priority Status to Postpetition Intercompany and Applicable Affiliate Claims, (IV) Waiving Compliance with Restrictions Imposed by Section 345 of the Bankruptcy Code, and (V) Authorizing Continued Use of Prepetition Bank Accounts, Payment Methods and Existing Business Forms.* ECF 430.
  2. *Omnibus Certificate of No Objection.* ECF No. 1094.
- iv. **Status:** This matter is going forward on an uncontested basis.

### III. ADJOURNED MATTERS

1. **Motion to Retain Larrain Vial.** *Debtors' Application for an Order Authorizing Employment and Retention of Larrain Vial Servicios Profesionales Limitada as Latin America Investment Banker to the Debtors and Debtors-in-Possession Effective as of the Petition Date.* ECF No. 582.
  - i. **General Response Deadline:** July 23, 2020 at 4:00 P.M.
  - ii. **Response Deadline for the United States Trustee:** September 14, 2020 at 4:00 P.M.
  - iii. **Responses Received:**
    1. *Objection of the Ad Hoc Group of LATAM Bondholders to Debtors' Application for an Order Authorizing the Employment and Retention of Larrain Vial Servicios Profesionales Limitada as Latin America Investment Banker to the Debtors and Debtors-in-Possession Effective as of the Petition Date.* ECF No. 655.
    2. *Objection of the Official Committee of Unsecured Creditors to the Debtors' Application for Order Authorizing Employment and Retention of Larrain Vial Servicios Profesionales Limitada as Latin America Investment Banker to the Debtors.* ECF No. 656.
  - iv. **Status:** This matter has been adjourned to the October 20, 2020 omnibus hearing date.
2. **Motion to Retain PwC Chile.** *Debtors' Application for an Order Authorizing*

*the Retention and Employment of PricewaterhouseCoopers Consultores Auditores SPA as Independent Auditors to Debtors Effective Nunc Pro Tunc to the Date of the Applicable Engagement Letter.* ECF No. 579.

- i. **General Response Deadline:** July 23, 2020 at 4:00 P.M.
  - ii. **Response Deadline for the United States Trustee:** October 9, 2020 at 4:00 P.M.
  - iii. **Status:** This matter has been adjourned to the October 20, 2020 omnibus hearing date.
  
3. **Application to Retain Certain PricewaterhouseCoopers Entities.** *Debtors' Application for an Order Authorizing the Retention and Employment of (I) PwC Contadores y Auditores Ltda., (II) PricewaterhouseCoopers del Ecuador Cía. Ltda, and (III) Gaveglio Aparicio y Asociados S. Civil de R.L. as Independent Auditors to Debtors Effective Nunc Pro Tunc to the Date of the Applicable Engagement Letter.* ECF No. 789.
  - i. **Response Deadline:** August 12, 2020 at 4:00 P.M.
  - ii. **Response Deadline for the United States Trustee:** October 9, 2020 at 4:00 P.M.
  - iii. **Responses Received:** *None*
  - iv. **Status:** This matter has been adjourned to the October 20, 2020 omnibus hearing date.
  
1. **Application to Retain UBS Securities.** *Application for Order Authorizing Employment and Retention of UBS Securities LLC as Investment Banker to the Official Committee of Unsecured Creditors, Effective as of June 9, 2020.* ECF No. 1046.
  - i. **General Response Deadline:** September 16, 2020 at 4:00 P.M.
  - ii. **Debtor's Objection Deadline:** October 13, 2020 at 4:00 P.M.
  - iii. **Responses Received:**
    1. *Ad Hoc Bondholder Group's Limited Objection to Application for Order Authorizing Employment and Retention of UBS Securities LLC as Investment Banker to the Official Committee of Unsecured Creditors.* ECF No. 1075.
  - iv. **Related Documents:** *None*
  - v. **Status:** The matter has been requested to be adjourned to the October

20, 2020 omnibus hearing.

4. **Motion to Reject Aircraft.** *Debtors' Third Motion for Entry of an Order (I) Authorizing Debtors to Reject Certain Aircraft Leases and Abandon Certain Aircraft and (II) Approving Return Procedures.* ECF No. 735.
  - i. **General Response Deadline:** August 14, 2020, at 12:00 P.M.
  - ii. **Responses Received:** *None*
  - iii. **Status:** The matter has been adjourned to the October 20, 2020 omnibus hearing with respect to aircraft bearing manufacturer serial numbers 2924, 5666, and 5654. This Motion has been withdrawn with respect to the aircraft bearing manufacturer serial numbers 6592, 6632, 6658, 6670, and 6685.
  
5. **Motion to Lift the Automatic Stay.** *Motion of Corporación Nacional de Consumidores y Usuarios de Chile for Order (I) Modifying or Annuling Automatic Stay of 11 U.S.C. §362 to Permit Continuation of Chilean Action, and (II) Scheduling a Joint Hearing with the Chilean Insolvency Court.* ECF No. 970.
  - i. **Response Deadline:** September 16, 2020, at 4:00 P.M.
  - ii. **Responses Received:**
    1. *Debtors' Objection to the Motion of Corporación Nacional de Consumidores y Usuarios de Chile for Order (I) Modifying or Annuling Automatic Stay of 11 U.S.C. §362 to Permit Continuation of Chilean Action, and (II) Scheduling a Joint Hearing with the Chilean Insolvency Court.* ECF No. 1076.
    2. *Statement of the Official Committee of Unsecured Creditors Regarding the Motion of Corporación Nacional de Consumidores y Usuarios de Chile for Order (I) Modifying or Annuling Automatic Stay of 11 U.S.C. §362 to Permit Continuation of Chilean Action, and (II) Scheduling a Joint Hearing with the Chilean Insolvency Court.* ECF No. 1077.
  - iii. **Related Documents:**
    1. *Notice of Adjournment of Hearing of Motion of Nacional de Consumidores y Usuarios de Chile for Order (I) Modifying or Annuling Automatic Stay of 11 U.S.C. §362 to Permit Continuation of Chilean Action, and (II) Scheduling a Joint Hearing with the Chilean Insolvency Court.* ECF No. 1085.
  - iv. **Status:** The matter has been adjourned to the November 18, 2020 omnibus hearing.



6. **Application to Retain Conway Mackenzie.** *Application of the Official Committee of Unsecured Creditors of LATAM Airlines Group S.A., Et al. for Entry of an Order Authorizing the Employment and Retention of Conway MacKenzie, LLC as Financial Advisor, Effective as of June 9, 2020.* ECF No. 1044.

- i. **Response Deadline:** September 16, 2020 at 4:00 P.M.
- ii. **Responses Received:** None
- iii. **Status:** This matter has been adjourned to the October 20, 2020 omnibus hearing.

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Dated: September 22, 2020  
New York, New York

/s/ Lisa M. Schweitzer  
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