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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

: Chapter 11

AVIANCA HOLDINGS S.A., et al., 1 : Case No. 20-11133 (MG)

:

Debtors. : (Jointly Administered)

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DEBTORS' WITNESS AND EXHIBIT LIST

The above-captioned debtors and debtors in possession in the above-captioned chapter 11 cases (the "<u>Debtors</u>") identify the following witnesses whom they intend to call at the hearing regarding (i) the *Debtors' Motion for an Order Pursuant to Sections 363(b), 507, and 105(a) of*

The Debtors in these chapter 11 cases, and each Debtor's federal tax identification number (to the extent applicable), are as follows: Avianca Holdings S.A. (N/A); Aero Transporte de Carga Unión, S.A. de C.V. (N/A); Aeroinversiones de Honduras, S.A. (N/A); Aerovías del Continente Americano S.A. Avianca (N/A); Airlease Holdings One Ltd. (N/A); America Central (Canada) Corp. (00-1071563); America Central Corp. (65-0444665); AV International Holdco S.A. (N/A); AV International Holdings S.A. (N/A); AV International Investments S.A. (N/A); AV International Ventures S.A. (N/A); AV Investments One Colombia S.A.S. (N/A); AV Investments Two Colombia S.A.S. (N/A); AV Taca International Holdco S.A. (N/A); Avianca Costa Rica S.A. (N/A); Avianca Leasing, LLC (47-2628716); Avianca, Inc. (13-1868573); Avianca-Ecuador S.A. (N/A); Aviaservicios, S.A. (N/A); Aviateca, S.A. (N/A); Avifreight Holding Mexico, S.A.P.I. de C.V. (N/A); C.R. Int'l Enterprises, Inc. (59-2240957); Grupo Taca Holdings Limited (N/A); International Trade Marks Agency Inc. (N/A); Inversiones del Caribe, S.A. (N/A); Isleña de Inversiones, S.A. de C.V. (N/A); Latin Airways Corp. (N/A); Latin Logistics, LLC (41-2187926); Nicaraguense de Aviación, Sociedad Anónima (Nica, S.A.) (N/A); Regional Express Américas S.A.S. (N/A); Ronair N.V. (N/A); Servicio Terrestre, Aereo y Rampa S.A. (N/A); Servicios Aeroportuarios Integrados SAI S.A.S. (92-4006439); Taca de Honduras, S.A. de C.V. (N/A); Taca de México, S.A. (N/A); Taca International Airlines S.A. (N/A); Taca S.A. (N/A); Tampa Cargo S.A.S. (N/A); Technical and Training Services, S.A. de C.V. (N/A). The Debtors' principal offices are located at Avenida Calle 26 # 59 – 15 Bogotá, Colombia.



- 1 -

the Bankruptcy Code (I) Authorizing, but not Directing, the Debtors to (A) Pay Prepetition Wages, Compensation and Employee Benefits and (B) Continue Payment of Wages, Compensation, Employee Benefits and Related Administrative Obligations in the Ordinary Course of Business; and (II) Authorizing and Directing Applicable Banks and Financial Institutions to Process and Pay all Checks Presented for Payment and to Honor all Funds Transfer Requests Made by the Debtors [Docket No. 3] (the "Wages Motion"), and (ii) the Debtors' Application for Entry of Order Authorizing Employment and Retention of Oliver Wyman, Inc. and Oliver Wyman Services Limited as Strategic Advisor [Docket No. 370] (the "OW Retention Application"), each of which are scheduled to be heard at the July 15, 2020 hearing:

- 1. Adrian Neuhauser, Chief Financial Officer of Avianca Holdings S.A.
- 2. Felipe Álvarez, member of the Colombian firm Álvarez Liévano & Laserna
- 3. Tim Hoyland, Senior Partner and Co-Head of the Global Aerospace Practice of Oliver Wyman
- 4. Matthew Cunningham, Chief Financial Officer of Oliver Wyman Group

The Debtors reserve the right to call witnesses on rebuttal who are not identified herein.

The Debtors further reserve the right to identify additional witnesses in response to replies or witness lists filed by other parties.

The Debtors submit the following exhibits in support of the Wages Motion and the OW Retention Application:²

<u>EXHIBIT</u>	DESCRIPTION
1	Declaration of Adrian Neuhauser in Support of Chapter 11 Petitions and First Day Motions [Docket No. 20]

The Office of the United States Trustee has indicated to the Debtors that it does not object to the admissibility of the declarations into evidence.

2	Declaration of Adrian Neuhauser in Support of the Debtors' Reply to Objection of the United States Trustee to Entry of Order Authorizing the debtors to Pay Wages, Compensation, Employee Benefits and Related Relief [Docket No. 238-B]
3	Summary of Incentive Plan Participants [Docket No. 238-E, Filed Under Seal]
4	Declaration of Adrian Neuhauser in Support of the Debtors' Supplemental Reply to Objection of the United States Trustee to Entry of Order Authorizing the debtors to Pay Wages, Compensation, Employee Benefits and Related Relief [Docket No. 456-A]
5	Declaration of Felipe Alvarez in Support of the Debtors' Supplemental Reply to Objection of the United States Trustee to Entry of Order Authorizing the debtors to Pay Wages, Compensation, Employee Benefits and Related Relief [Docket No. 456-B]
6	Declaration of Tim Hoyland in Support of Debtors' Application for Entry of Order Authorizing Employment and Retention of Oliver Wyman, Inc. and Oliver Wyman Services Limited as Strategic Advisor [Docket No. 370-B]
7	Declaration of Matthew Cunningham in Support of Debtors' Application for Entry of Order Authorizing Employment and Retention of Oliver Wyman, Inc. and Oliver Wyman Services Limited as Strategic Advisor [Docket No. 453-A]
8	Long Term Incentive Plan (English translation)

Date: July 14, 2020

New York, New York

/s/ Evan R. Fleck

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- and -

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