

DRINKER BIDDLE & REATH LLP
Kristin K. Going
1177 Avenue of the Americas
41st Floor
New York, NY 10036-2714
Tel: (212) 248-3273
Fax: (212) 248-3141
E-mail: kristin.going@dbr.com

*Attorney for Wilmington Trust Company, as Trust Administrator and Trustee for the Motors
Liquidation Company GUC Trust*

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*, f/k/a
General Motors Corp., *et al.*

Debtors.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

MOTORS LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST, by and through
Wilmington Trust Company, solely in its capacity as
Trust Administrator and Trustee

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

Adversary Proceeding

Case No. 09-00504 (MG)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that Drinker Biddle & Reath LLP hereby appears (this
“Notice of Appearance”) in the above-captioned adversary proceeding as counsel to
Wilmington Trust Company (“WTC”), as trust administrator and trustee of the Motors
Liquidation Company GUC Trust. Pursuant to sections 102(1), 342, and 1109(b) of Title 11
of the United States Code, 11 U.S.C. §§ 101 – 1532, and Rules 2002, 9007, and 9010 of the

Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), counsel requests that their names be added to the mailing list maintained by the Clerk in the above-captioned adversary proceeding and that any and all notices and pleadings given or required to be given in the above-captioned adversary proceeding, and any and all papers served or required to be served in the above-captioned adversary proceeding be given and served upon counsel at the addresses and numbers set forth below:

Drinker Biddle & Reath LLP
1177 Avenue of the Americas
41st Floor
New York, New York 10036-2714
Attn: Kristin K. Going, Esq.
Clay J. Pierce, Esq.
Marita S. Erbeck, Esq.
E-mail: Kristin.Going@dbr.com; Clay.Pierce@dbr.com;
Marita.Erbeck@dbr.com;
Telephone: (212) 248-3140 (Main)
Facsimile: (212) 248-3141

PLEASE TAKE FURTHER NOTICE, that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any and all orders, notices, applications, motions, petitions, pleadings, requests, objections, complaints, demands, other filings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile, e-mail, or otherwise, which relate in any way to the above-captioned case or which affect or seek to affect in any way, the rights or interests of WTC.

PLEASE TAKE FURTHER NOTICE, that this Notice of Appearance shall not be deemed or construed to be a waiver of WTC’s right (i) to have final orders in non-core matters entered only after *de novo* review by a United States District Judge, (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, (iii) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to any other rights, claims, actions,

