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Counsel for State of Indiana Major Moves

**UNITED STATES BANKRUPTCY COURT**

**SOUTHERN DISTRICT OF NEW YORK**

|   |   |                          |
|---|---|--------------------------|
| In re:                                    | ) | Chapter 11               |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> | ) | Case No.: 09-50026 (REG) |
|   | ) | (Jointly Administered)   |
| Debtor.                                   | ) |                          |
| MOTORS LIQUIDATION COMPANY                | ) |                          |
| AVOIDANCE ACTION TRUST,                   | ) |                          |
|   | ) |                          |
| Plaintiff.                                | ) | Adversary Proceeding     |
|   | ) | Case No.: 09-00504 (REG) |
| -against-                                 | ) |                          |
| JPMORGAN CHASE BANK, N.A. <i>et al.</i>   | ) |                          |
|   | ) |                          |
| Defendants                                | ) |                          |
|   | ) |                          |

**APPEARANCE**

PLEASE ENTER THE APPEARANCE of Gregory F. Zoeller, Attorney General of the State of Indiana, and Heather M. Crockett, Deputy Attorney General, as attorneys for the State of Indiana Major Moves (“IMM”) in the above captioned adversary proceeding and requests, in accordance with Rule 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of the United States Bankruptcy Code, that all notices given or required to be given in connection with the above captioned adversary proceeding, and all papers served or required to be served in connection therewith, be given and served upon:

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Please take further notice that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed within the above captioned adversary proceeding, whether such notice is formal or informal, written or oral, and whether transmitted by hand deliver, United States Mail, electronic mail, expedited delivery service, telephone, telex, telecopy or otherwise.

This notice of appearance and request for notice and service of papers is not, and may not be deemed or construed to be, a waiver of any of IMM's substantive or procedural rights, including without limitation: (1) IMM's right to have final orders in non-core matters entered only after a de novo review by a District Judge; (2) IMM's right to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (3) IMM Defendant's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; (4) IMM's right to have any claims constitutionally required to be determined by the District Court to be determined therein; (5) IMM's right to have any matter heard by an arbitrator; or (6) any other rights, claims, actions, defenses, set-offs, or recoupments to which IMM is or may be entitled in law or in equity or under any agreement, all of which IMM expressly reserves.

Date: June 25, 2015

By: /s/ Heather M. Crockett  
Heather M. Crockett  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2015, a copy of the foregoing Appearance was filed electronically. Notice of this filing will be sent through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

/s/ Heather M. Crockett  
Heather M. Crockett  
Deputy Attorney General