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*Counsel for Canadian Imperial Bank of Commerce*

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*

Debtors.

OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF MOTORS LIQUIDATION  
COMPANY f/k/a GENERAL MOTORS  
CORPORATION,

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A., individually and  
as Administrative Agent for Various lenders party to  
the Term Loan Agreement described herein, *et al.*,

Defendants.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

**NOTICE OF APPEARANCE OF COUNSEL AND REQUEST FOR SERVICE OF  
NOTICES, PLEADINGS AND OTHER DOCUMENTS**

**PLEASE TAKE NOTICE** that the undersigned hereby appears as counsel for **CANADIAN IMPERIAL BANK OF COMMERCE** (“Claimant”), a creditor and party in interest, and under, *inter alia*, Bankruptcy Rules 2002 and 9007 and Section 1109(b) of the Bankruptcy Code, 11 U.S.C. § 1109(b), requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon:

Oscar N. Pinkas, Esq.  
Dentons US LLP  
1221 Avenue of the Americas  
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and

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**PLEASE TAKE FURTHER NOTICE** that under Section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any order, notice, application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interests of any creditor or party in interest in this case, including Claimant with respect to, *inter alia*, the following: (a) the debtor; or (b) property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the

possession, custody, or control of others that the debtor may seek to use or claim; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by Claimant.

**PLEASE TAKE FURTHER NOTICE** that Claimant intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive: (1) Claimant's right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) Claimant's right to trial by jury in any proceeding so triable in this case; (3) Claimant's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Claimant is or may be entitled, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Claimant expressly reserves.

Dated: New York, New York  
July 13, 2015

DENTONS US LLP

By: /s/ Oscar N. Pinkas

Oscar N. Pinkas, Esq.  
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*Counsel for Canadian Imperial Bank of Commerce*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing *Notice Of Appearance, Request For Service Of Papers, And Reservation Of Rights* was served via CM/ECF filing and by mail to the persons listed below, via First-Class United States Mail with sufficient postage prepaid, and addressed as follows:

Eric B. Fisher  
Barry Seidel  
Dickstein Shapiro LLP  
1633 Broadway  
New York, NY 10019

This 13<sup>th</sup> day of July, 2015.

*/s/ Oscar N. Pinkas*  
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Oscar N. Pinkas, Esq.