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*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.

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

Plaintiff,

v.

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

Defendants.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (MG)

(AMENDED)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that McDermott Will & Emery 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 her name 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 address and number set forth below:

MCDERMOTT WILL & EMERY LLP
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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, defenses, setoffs, or recoupments to which WTC is or may be entitled, under agreement, in equity or in law, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: New York, New York
July 19, 2019

MCDERMOTT WILL & EMERY LLP

By: /s/ Kristin K. Going

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