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Counsel to Defendant Bechtel Trust & Thrift Plan

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

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In re:

Chapter 11

MOTORS LIQUIDATION COMPANY, *et al.*,

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered)

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

Plaintiff,

Adversary Proceeding
Case No.: 09-00504 (REG)

v.

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

Defendants.

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**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the law firm of **Hahn & Hessen LLP** hereby appears
as counsel in this case on behalf of Bechtel Trust & Thrift Plan, and, if appropriate, its affiliates, a
named-defendant in this adversary proceeding, and that pursuant to Rules 2002, 9007 and 9010(b)

of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and sections 102(1), 342 and 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), all notices given or required to be given in this proceeding and all papers served or required to be served in this proceeding, be served upon the following:

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Dated: New York, New York
July 27, 2015

HAHN & HESSEN LLP

By: /s/ Mark T. Power

Mark T. Power
A Member of the Firm

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