

HEARING DATE AND TIME: September 22, 2015 at 9:45 a.m. (Eastern Time)
Evidentiary Hearing Requested

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GUC Trust Administrator*

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

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In re	: Chapter 11 Case No.
	:
MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al.	: 09-50026 (REG)
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**NOTICE OF RESCHEDULED HEARING WITH RESPECT
TO PLAINTIFFS' REQUEST FOR A STAY PENDING APPEAL**

PLEASE TAKE NOTICE that on June 3, 2015, Wilmington Trust Company, solely in its capacity as trust administrator and trustee (in such capacity, the "GUC Trust Administrator"), of the Motors Liquidation Company GUC Trust (the "GUC Trust"), formed by the above-captioned debtors in connection with the Debtors' Second Amended Joint Chapter 11 Plan dated March 18, 2011, filed a motion (the "Motion") for an order, pursuant to sections 105(a) and 1142(b) of title 11 of the United States Code and section 13.13 of the Amended and Restated Motors Liquidation Company GUC Trust Agreement dated June 11, 2012 (as amended, the "GUC Trust Agreement"), authorizing the GUC Trust Administrator to (A) (i) exercise and/or liquidate the GUC Trust's holdings of certain warrants issued by General Motors Company ("New GM"), (ii) liquidate the GUC Trust's holdings of common stock issued by New GM, and (B) make corresponding

amendments to the GUC Trust Agreement [Docket No. 13186].

PLEASE TAKE FURTHER NOTICE that on June 24, 2015, the Ignition Switch Plaintiffs, Certain Non-Ignition Switch Plaintiffs, and the Ignition Switch Pre-Closing Accident Plaintiffs (collectively, "**Plaintiffs**") filed responses to the Motion affirmatively requesting a stay of interim distributions by the GUC Trust pending resolution of certain Plaintiffs' appeal of this Court's equitable mootness holdings in the *Decision on Motion to Enforce Sale Order* (the "**Stay Requests**") [Docket Nos. 13246, 13248].

PLEASE TAKE FURTHER NOTICE that on June 26, 2015, the GUC Trust Administrator and certain unaffiliated holders of beneficial units of the GUC Trust filed replies to the Stay Requests (the "**Stay Request Replies**") [Docket Nos. 13256, 13257].

PLEASE TAKE FURTHER NOTICE that on July 2, 2015, following a hearing, the Court entered an order approving the Motion, and adjourned the hearing on the Stay Requests and the Stay Request Replies, which hearing was originally scheduled for August 12, 2015 [Docket No. 13314].

PLEASE TAKE FURTHER NOTICE that the hearing on Stay Requests and Stay Request Replies has been further rescheduled for **September 22, 2015, at 9:45 a.m.**, and will proceed as an evidentiary hearing.

Dated: New York, New York
August 4, 2015

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Matthew J. Williams

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