

DRINKER BIDDLE & REATH LLP
Clay J. Pierce
1177 Avenue of the Americas
41st Floor
New York, NY 10036-2714
Tel: (212) 248-3186
Fax: (212) 248-3141
E-mail: Clay.Pierce@dbr.com

*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**

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

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that Clay J. Pierce of Drinker Biddle & Reath LLP hereby appears (this “Notice of Appearance”) in the above-captioned Chapter 11 cases as counsel to Wilmington Trust Company (“WTC”), as trust administrator and trustee of the Motors Liquidation Company GUC Trust, and, 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, 7005, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), requests that his name be added to the mailing list maintained by the Clerk in the above-captioned Chapter 11 cases and that any and all notices and pleadings given or required to be given in the above-captioned Chapter 11 cases, and any and all papers served or required to be served in the above-captioned Chapter 11 cases be given and served upon counsel at the addresses and numbers set forth below:

Drinker Biddle & Reath LLP
1177 Avenue of the Americas
41st Floor

New York, New York 10036-2714
Attn: Clay J. Pierce, Esq.
E-mail: Clay.Pierce@dbr.com;

Telephone: (212) 248-3140 (Main)
Facsimile: (212) 248-3141

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 with respect to the above-captioned Debtors, or any related entity, or property or proceeds in which the Debtors may claim an interest.

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, setoffs, or recoupments to which WTC is or may be entitled, in equity or in law, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: New York, New York
June 19, 2018

DRINKER BIDDLE & REATH LLP

By: /s/ Clay J. Pierce
Clay J. Pierce
1177 Avenue of the Americas
41st Floor

New York, NY 10036-2714
Tel: (212) 248-3140 (Main)
Fax: (212) 248-3141
E-mail: Clay.Pierce@dbr.com

*Attorney for Wilmington Trust Company, as Trust
Administrator and Trustee for the Motors Liquidation
Company GUC Trust*