

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

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In re:

Chapter 11

**MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, et al.,**

**Case No. 09-50026 (MG)
(Jointly Administered)**

Debtors.

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AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss
COUNTY OF NASSAU)

I, Alison Moodie, being duly sworn, depose and state:

1. I am a Senior Case Manager with Epiq Class Action & Claims Solutions, Inc.,¹ the claims and noticing agent for the debtors and debtors-in-possession (the “Debtors”) in the above-captioned proceeding. Our business address is 1985 Marcus Avenue, Suite 200, Lake Success, New York 11042.

2. On December 18, 2019, at the direction of Drinker Biddle & Reath LLP, attorneys for the Motors Liquidation Company GUC Trust Administrator, I caused a true and correct copy of the following document to be served by e-mail on the Depository Trust Company’s LENSNOTICE system to legalandtaxnotices@dtcc.com:

¹ Epiq Class Action and Claims Solutions, Inc. acquired Garden City Group, LLC on June 15, 2018.

- **Notice to Holders of Motors Liquidation Company GUC Trust Units (CUSIP No. 62010U101)** [Annexed hereto as Exhibit A].

/s/ Alison Moodie
Alison Moodie

Sworn to before me this 27th day of
December, 2019

/s/ Susana V. Topino
Susana V. Topino
Notary Public, State of New York
License No. 01TO6168161
Qualified in Queens County
Commission Expires June 11, 2023

EXHIBIT A

**ALL DEPOSITORIES, NOMINEES, BROKERS AND OTHERS:
PLEASE FACILITATE THE TRANSMISSION OF THIS NOTICE
TO ALL BENEFICIAL OWNERS.**

**NOTICE
TO HOLDERS OF**

**MOTORS LIQUIDATION COMPANY
GUC TRUST UNITS (CUSIP NO. 62010U101)¹**

December 18, 2019

Reference is made to (i) the Second Amended Joint Chapter 11 Plan dated as of March 18, 2011 of Motors Liquidation Company and certain of its affiliates, which was confirmed by an order of the Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) entered on March 29, 2011 (as so confirmed, the “Plan”) and which became effective on March 31, 2011, and (ii) the Second Amended and Restated Motors Liquidation Company GUC Trust Agreement dated as of July 30, 2015 (the “GUC Trust Agreement”).² The above-described units representing contingent beneficial interests in the GUC Trust (the “Trust Units”) were issued pursuant to the terms of the Plan and the GUC Trust Agreement. Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.

The Plan provides for the establishment of the Motors Liquidation Company GUC Trust (the “GUC Trust”) to implement the Plan, including by distributing GUC Trust Distributable Assets (as defined in the GUC Trust Agreement) and resolving outstanding Disputed General Unsecured Claims.

Wilmington Trust Company, as trust administrator and trustee of the GUC Trust (in such capacity, the “GUC Trust Administrator”), hereby informs you that, on December 18, 2019, the GUC Trust Administrator filed a motion (the “Motion”) with the Bankruptcy Court seeking authority to, among other things, reallocate and use certain GUC Trust Distributable Assets for the purposes of funding projected costs, fees and expenses of the GUC Trust. A copy of the Motion is available on the website maintained by the GUC Trust: www.mlcgustrust.com.

The Motion is currently scheduled to be heard by the Bankruptcy Court on **January 7, 2020 at 11:00 a.m. (Eastern)**, with an objection deadline of **December 31, 2019 at 4:00 p.m. (Eastern)**.³

¹ The CUSIP number appearing herein has been included solely for the convenience of the holders of the Trust Units. Wilmington Trust Company assumes no responsibility for the selection or use of such number and makes no representations as to the correctness of the CUSIP number appearing herein.

² Information on the bankruptcy proceedings, including a copy of the Plan, can be found at: <http://www.motorsliquidationdocket.com/>. Information can also be found on the website maintained by the trust administrator and trustee of the Motors Liquidation Company GUC Trust at <https://www.mlcgustrust.com/>.

³ Please note the times and dates set forth herein are subject to change without further notice.

Wilmington Trust Company has prepared this communication in its capacity as GUC Trust Administrator, based upon information supplied to it without independent investigation. You should not rely on Wilmington Trust Company as your sole source of information. Wilmington Trust Company makes no recommendations and gives no investment or legal advice herein, and holders of Trust Units are urged to consult with their own advisors concerning the Trust Units, the Plan and the Motion.

Should any holder of Trust Units have any questions regarding this notice, please contact Wilmington Trust Company as follows:

Wilmington Trust Company
Rodney Square North
1110 North Market Street
Wilmington, Delaware, 19890-1615
Phone No.: (866) 521-0079
Fax No.: (302) 636-4140

Wilmington Trust Company may conclude that a specific response to particular inquiries from individual holders of Trust Units is not consistent with its duties to provide equal and full dissemination to all holders of Trust Units.

Very Truly Yours,

Wilmington Trust Company,
solely in its capacity as GUC Trust Administrator