

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

In re:	:	Chapter 11 Case
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	:	
MOTORS LIQUIDATION COMPANY AVOIDANCE	:	Adversary Proceeding
ACTION TRUST, by and through the Wilmington Trust	:	
Company, solely in its capacity as Trust Administrator and	:	Case No. 09-00504 (REG)
Trustee,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JPMORGAN CHASE BANK, N.A., individually and as	:	
Administrative Agent for various lenders party to the Term	:	
Loan Agreement described herein, <i>et al.</i> ,	:	
	:	
Defendants.	:	

NOTICE OF APPEARANCE

To the Clerk of this Court and all parties of record:

PLEASE TAKE NOTICE that the undersigned counsel, Robert T. Honeywell of K&L Gates LLP, a member of this Court in good standing, respectfully enters his appearance as counsel of record for Defendant Ivy Funds, on behalf of its Series, Ivy High Income Fund.¹

NOTICE IS FURTHER GIVEN, that pursuant Rule 2002 to the Federal Rules of Bankruptcy Procedure, it is requested that all notices given or required to be given in this adversary proceeding, including but not limited to all papers filed and served in this adversary proceeding, be given to and served upon:

¹ Named in the First Amended Adversary Complaint in the Adversary Proceeding as “Ivy Fund Inc.-High Income Fund” and “Ivy Funds-Ivy High Income Fund”.

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599 Lexington Avenue
New York, NY 10022
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(212) 536-3900

NOTICE IS FURTHER GIVEN, that the foregoing request includes not only notices and papers referred to in Rule 2002 of the Federal Rules of Bankruptcy Procedure, but also includes, without limitation, orders and notices of applications, motions, petitions, pleadings, requests, complaints or demands, whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, or otherwise.

The filing of this appearance shall not waive any defenses or arguments that may be available to the Defendant Ivy Funds, on behalf of its Series, Ivy High Income Fund.

Any and all defenses and/or arguments available to the Defendant Ivy Funds, on behalf of its Series, Ivy High Income Fund are hereby expressly preserved.

Dated: New York, New York
November 16, 2015

Respectfully submitted,

K&L GATES LLP

By: /s/ Robert T. Honeywell
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*Counsel for Defendant Ivy Funds,
on behalf of its Series, Ivy High Income Fund*