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Attorneys for the parties identified below

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, et al.,

Debtors.

MOTORS LIQUIDATION COMPANY

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

Plaintiff,

VS.

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

Defendants.

Chapter 11 Case

Case No. 09-50026 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appear in the abovecaptioned adversary proceeding as counsel for the Royal Bank of Scotland PLC, Carbonado LLC, Marathon CLO I Ltd., Marathon CLO II Ltd., Marathon Financing I, B.V., and Goldman Sachs – ABS Loans 2007 Ltd. and request, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, and Sections 102(1) and 1109(b) of the United States Bankruptcy Code, that all notices given or required to be given in connection with the captioned proceeding, and all papers served or required to be served in connection therewith, be given and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed in this proceeding whether such notice is formal or informal, written or oral, and whether transmitted by hand delivery, United States Mail, electronic mail, expedited delivery service, telephone, telex, telecopy or otherwise.

Dated: New York, New York November 16, 2015

By: /s/ Elliot Moskowitz
Elliot Moskowitz

Marc J. Tobak

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Attorneys for the Royal Bank of Scotland PLC, Carbonado LLC, Marathon CLO I Ltd., Marathon CLO II Ltd., Marathon Financing I, B.V., and Goldman Sachs – ABS Loans 2007 Ltd.