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*Attorneys for Continental Casualty Company*

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

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In re:

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

Debtors.

Chapter 11

Case No. 09-50026 (REG)  
(Jointly Administered)

-----X  
MOTORS LIQUIDATION COMPANY AVOIDANCE  
ACTION TRUST, by and through the Wilmington Trust  
Company, solely in its capacity as Trust Administrator and  
Trustee,

Plaintiff,

Adversary Proceeding  
Case No. 09-00504 (REG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

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**NOTICE OF APPEARANCE**

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

**PLEASE TAKE NOTICE** that the undersigned counsel, William P. Lalor of Elenius Frost & Walsh, a member of this Court in good standing, respectfully enters his appearance as counsel of record for Defendant Continental Casualty Company (“Continental”).

**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:

ELENIUS FROST & WALSH  
125 BROAD STEET, 7<sup>TH</sup> FLOOR  
New York, NY 10004  
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[william.lalor@CNA.com](mailto:william.lalor@CNA.com)  
(212) 440-2516

**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 Continental.

Any and all defenses and/or arguments available to Continental are hereby expressly preserved.

New York, New York  
December 11, 2015

ELENIUS FROST & WALSH

*s/ William P. Lalor*

William P. Lalor

ELENIUS FROST & WALSH

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