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Hearing Date and Time: To be determined by the Court  
Objections Due (per Scheduling Order): January 20, 2016  
Reply Due (per Scheduling Order): February 15, 2016

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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.*,

Chapter 11

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

Debtors.

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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 MOTION TO DISMISS**

PLEASE TAKE NOTICE that a hearing to consider the relief requested in  
*Defendant Continental Casualty Company's Motion to Dismiss Plaintiff's Amended  
Complaint* (the "Continental Motion to Dismiss") shall be held before the Honorable

United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom to be determined, One Bowling Green, New York, New York 10004 (the “Court”) on a date and at a time to be determined by the Court.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Continental Motion to Dismiss and the relief requested therein shall be made in writing, shall state with particularity the grounds therefor, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Court’s case filing system, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), with a hard copy delivered directly to Chambers, in accordance with the customary practices of the Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 on attorneys for Continental Casualty Company at Elenius Frost & Walsh, 125 Broad St., 7th Floor, New York New York 10004 (Attn: William P. Lalor) and David Christian Attorneys LLC, 3515 W. 75th St., Suite 208, Prairie Village, Kansas 66208 (Attn: David Christian), so as to be received no later than January 20, 2016.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Continental Motion to Dismiss may be granted without a hearing if no objection is timely filed and served as set forth above.

New York, New York  
December 11, 2015

ELENIUS FROST & WALSH

*s/ William P. Lalor*

William P. Lalor

ELENIUS FROST & WALSH

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and

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