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[additional counsel listed on signature page]

*The Term Loan Lenders are listed in Appendix A to the Answer [Dkt. 241]

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

In re:)	Chapter 11 Case
)	
MOTORS LIQUIDATION COMPANY, et al.,)	Case No. 09-50026 (REG)
)	
Debtors.)	(Jointly Administered)
)	
MOTORS LIQUIDATION COMPANY AVOIDANCE ACTION TRUST,)	Adv. Proc. No. 09-00504 (REG)
)	
Plaintiff,)	
)	
vs.)	
)	
JPMORGAN CHASE BANK, M.A., et al.,)	
)	
Defendants.)	
)	
)	

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Bradley R. Schneider, request admission, *pro hac vice*, before the Honorable Martin Glenn, to represent defendants, The Term Loan Lenders, in the above-referenced adversary proceeding. A complete list of represented defendants is listed in Appendix A to the Answer at Dkt. 241.

I am a member in good standing of the bar in the State of California and all of its Courts, the bars for the U.S. District Courts of the Central and Northern Districts of California and the U.S. Court of Appeals for the Ninth Circuit.

I have electronically submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: March 30, 2016

Respectfully submitted,

/s/ Bradley R. Schneider

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*[*complete list of represented defendants listed in Appendix A to the Answer at Dkt. 241]*

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

In re:)	Case No. 09-50026 (REG)
MOTORS LIQUIDATION COMPANY, et)	
al.,)	Chapter 11 Case
Debtors.)	(Jointly Administered)
MOTORS LIQUIDATION COMPANY)	
AVOIDANCE ACTION TRUST,)	Adv. Proc. No. 09-00504 (REG)
Plaintiff,)	
vs.)	
JPMORGAN CHASE BANK, M.A., et al.,)	
Defendants.)	
)	
)	

**[PROPOSED] ORDER AUTHORIZING ADMISSION *PRO HAC VICE*
OF BRADLEY R. SCHNEIDER**

Upon the motion of Bradley R. Schneider dated March 30, 2016, for admission *pro hac vice* in this proceeding; it is hereby

ORDERED, that Bradley R. Schneider is admitted to practice, *pro hac vice* in the above referenced proceeding, in the United States Bankruptcy Court, Southern District of New York, subject to payment of the filing fee.

Dated: _____, 2016
New York, New York

Honorable Martin Glenn
United States Bankruptcy Judge