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

**MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

I, Craig A. Lavoie, 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 certify that I am a member in good standing of the bar of the State of California and all of its Courts, and the bars of the U.S. District Courts for the Northern and Southern Districts of California.

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/ Craig A. Lavoie

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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 CRAIG A. LAVOIE**

Upon the motion of Craig A. Lavoie dated March 30, 2016, for admission *pro hac vice* in this proceeding; it is hereby

**ORDERED**, that Craig A. Lavoie 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