

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

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In re: MOTORS LIQUIDATION COMPANY,
et al.,
Debtors.

Case No: 09-50026
Chapter 11

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MOTORS LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST,

Adversary Proceeding No.: 09-00504

Plaintiff,

v.

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

Defendants.
-----x

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Matthew A. Alvis, request admission, *pro hac vice*, before the Honorable Martin Glenn, to represent Defendants Sanford C. Bernstein Fund Inc. - Intermediate Duration Portfolio, Sanford C. Bernstein Fund Inc. II - Intermediate Duration Institutional Portfolio (named in the Amended Complaint as "Sanford Bernstein II Interm DU"), and Ivy Funds, on behalf of its series, Ivy High Income Fund (named in the Amended Complaint as "Ivy Fund Inc.-High Income Fund" and "Ivy Funds-Ivy High Income Fund") in the above-referenced adversary proceeding.

I certify that I am a member in good standing of the bar in the State of Illinois and the bar of the U.S. District Court for the Northern District of Illinois.

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

Dated: April 19, 2016

/s/ Matthew A. Alvis

Matthew A. Alvis
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*Attorneys for Sanford C. Bernstein
Fund Inc. - Intermediate Duration
Portfolio, Sanford C. Bernstein Fund
Inc. II - Intermediate Duration
Institutional Portfolio, and Ivy
Funds, on behalf of its series, Ivy
High Income Fund*

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Defendants.

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[PROPOSED] ORDER GRANTING ADMISSION TO PRACTICE, *PRO HAC VICE*

Upon the motion of Matthew A. Alvis dated April 19, 2016, to be admitted, *pro hac vice*,
in the above referenced adversary proceeding, it is hereby

ORDERED, that Matthew A. Alvis is admitted to practice, *pro hac vice*, in the above
referenced adversary proceeding, in the United States Bankruptcy Court for the Southern District
of New York, subject to payment of the filing fee.

Dated: _____, 2016

_____, New York

/s/ _____
HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE