

KING & SPALDING LLP
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*Attorney for GMAM Investment Funds Trust, Lehman GMAM Investment Funds Trust,
 Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust, and
 RBC Dexia Investor Services Trust as Trustee for GM
 Canada Foreign Trust, by and through State Street Trust Company
 of Canada, as the final trustee on behalf of the GM Canada Foreign Trust*

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

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<i>In re:</i>	: Chapter 11
	: :
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (MG)
	: f/k/a General Motors Corp., <i>et al.</i>
	: :
Debtors.	: (Jointly Administered)
	: :
-----X	
MOTORS LIQUIDATION COMPANY AVOIDANCE	: :
ACTION TRUST, by and through the Wilmington Trust	: :
Company, solely in its capacity as Trust Administrator	: Adversary Proceeding
and Trustee,	: No. 09-00504 (MG)
	: :
Plaintiff,	: :
-against-	: :
	: :
JPMORGAN CHASE BANK, N.A. <i>et al.</i> ,	: :
	: :
Defendants.	: :
	: :
-----X	

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that on behalf of: (i) Defendants GMAM Investment Funds Trust (“**GIFT Trust**”), Lehman GMAM Investment Funds Trust (“**Lehman GIFT**”), and Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust (“**Pens Inv Comm**”), by and through General Motors Investment Management Corporation; and

(ii) Defendant RBC Dexia Investor Services Trust as Trustee for GM Canada Foreign Trust (“**RBC Dexia Trustee**”; together with GIFT Trust, Lehman GIFT, Pens Inv Comm, collectively, the “**Defendants**”), by and through State Street Trust Company of Canada, as the final trustee on behalf of the GM Canada Foreign Trust, King & Spalding LLP, hereby appears in this matter pursuant to Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, and requests that all notices given or required to be given in the above-captioned proceeding, and all papers served or required to be served in the above-captioned proceeding, be given and served upon the following person at the address set forth below:

King & Spalding LLP
1185 Avenue of the Americas
New York, New York 10036
Attn: Arthur J. Steinberg, Esq.
Telephone: (212) 556 – 2100
E-mail: asteinberg@kslaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed in the above-captioned proceeding whether such notice is formal or informal, written or oral, and whether transmitted by hand delivery, United States Mail, electronic mail, expedited delivery service, telephone, telex, telecopy or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit shall constitute a waiver of the Defendants’ substantive or procedural rights, including without limitation:

- (1) the right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Judge;
- (2) the right to trial by jury in any proceeding as to any and all matters so triable, whether or not such matters are designated as legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution;
- (3) the right to seek abstention or remand of any matter or proceeding subject to mandatory or discretionary abstention or remand, and to have the District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal;
- (4) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice;
- (5) right to receipt of service of process in all actions, causes, claims or proceedings arising in, arising under or related to this proceeding to be served directly on the Defendants as required by law;
- (6) right to contest service of process;
- (7) rights, remedies and claims against other entities or any objection that may be made to the jurisdiction and venue of the Court or venue of this case; or
- (8) any other rights, claims, actions, defenses, setoffs or recoupments to which the Defendants are or may be entitled under any agreements, or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by the Defendants without exception.

Dated: New York, New York
August 10, 2016

KING & SPALDING LLP

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