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ELENIUS FROST & WALSH
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Tel: 312-822-2365

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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**MOTION OF JAMES GITZLAFF
FOR ADMISSION TO PRACTICE *PRO HAC VICE***

I, James Gitzlaff, request admission, *pro hac vice*, before the Honorable Robert E.

Gerber, to represent Defendant Continental Casualty Company (“Continental”) in the above-

referenced bankruptcy proceeding and adversary proceeding (Nos. 09-bk-50026 (REG) and 09-ap-00504 (REG)).

1. The name, address, telephone number, and e-mail address of Movant are as follows:

James Gitzlaff
ELENIUS FROST & WALSH
333 South Wabash Avenue, 25th Floor
Chicago, IL 60604
312-822-2365
James.gitzlaff@cna.com

2. I certify that I am a member in good standing of the bar in the State of Illinois and various United States District Courts.

3. Movant's practice is concentrated in the areas of bankruptcy, business restructuring, and commercial litigation.

4. Movant has read, is familiar with, and will abide by the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

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

WHEREFORE, Movant respectfully requests the entry of an order authorizing special admission for the limited purpose of appearing in the above-captioned bankruptcy case and related adversary proceedings.

Signed, August 22, 2016

*Co-Counsel for Continental
Casualty Company*

s/ James Gitzlaff
James Gitzlaff
ELENIUS FROST & WALSH
333 South Wabash Avenue, 25th Floor
Chicago, IL 60604
312-822-2365
James.gitzlaff@cna.com

CERTIFICATE OF SERVICE

I, James Gitzlaff, hereby certify that on August 22, 2016, I caused a copy of the foregoing proposed Application for Admission Pro Hac Vice to be served via electronic service by the court's CM/ECF system on all counsel of record.

New York, New York, this 22nd day of August, 2016

s/ James Gitzlaff
James Gitzlaff

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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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**ORDER GRANTING ADMISSION FOR JAMES GITZLAFF TO PRACTICE
PRO HAC VICE**

Upon the motion of James Gitzlaff, to be admitted *Pro Hac Vice* to represent Continental Casualty Company, a Defendant in the above-captioned bankruptcy and adversary proceeding

(Nos. 09-bk-50026 (REG) and 09-ap-00504 (REG)), and upon the movant's certification that the movant is a member of good standing of the bar in the State of Illinois, and various United States District Courts, it is hereby

ORDERED that James Gitzlaff, Esq. is admitted to practice *Pro Hac Vice* in the above-captioned bankruptcy and adversary proceeding in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

Dated: _____

United States Bankruptcy Judge

CERTIFICATE OF SERVICE

I, James Gitzlaff, hereby certify that on August 22, 2016, I caused a copy of the foregoing proposed Order for Admission Pro Hac Vice to be served via electronic service by the court's CM/ECF system on all counsel of record.

New York, New York, this 22nd day of August, 2016

/s/ James Gitzlaff
James Gitzlaff