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*Attorney for Term Loan Lenders**

[*additional counsel listed on signature page*]

*The Term Loan Lenders are listed in Appendix A to the Answer, ECF No. 241.

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

In re:)	Chapter 11 Case
)	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,)	Case No. 09-50026 (MG)
)	
Debtors.)	(Jointly Administered)
)	
MOTORS LIQUIDATION COMPANY)	Adv. Proc. No. 09-00504 (MG)
AVOIDANCE ACTION TRUST,)	
)	
Plaintiff,)	
)	
v.)	
)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
)	
Defendants.)	
)	
)	
)	

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Nicholas D. Fram, 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, Central, Eastern, and Southern Districts of California and the Eastern District of New York.

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

Dated: October 7, 2016

Respectfully submitted,

/s/ Nicholas D. Fram

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Attorneys for Term Loan Lenders for certain purposes

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

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)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	
)	
)	

**[PROPOSED] ORDER AUTHORIZING ADMISSION *PRO HAC VICE*
OF NICHOLAS D. FRAM**

Upon the motion of Nicholas D. Fram dated October 7, 2016, for admission *pro hac vice* in this proceeding, it is hereby

ORDERED, that Nicholas D. Fram 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