

**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 (MG)
(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,

Adversary Proceeding

Plaintiff,

Case No. 09-00504 (MG)

against

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

Defendants.

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DECLARATION OF ANGELA FERRANTE

I, Angela Ferrante, being duly sworn, depose and state:

1. I am a Senior Vice President of Operations of the Garden City Group, LLC (“GCG”), the Court-approved claims and noticing agent for the debtors and debtors-in-possession (the “Debtors”) in the above-captioned proceeding. I have personal knowledge of all of the matters set forth herein and would competently testify to all such matters if called upon to do so.

2. For over thirty years, GCG has provided legal administrative services for class action, mass tort and bankruptcy cases, and has expertise in effecting timely and accurate service of process in complex bankruptcy matters. GCG was retained by Motors Liquidation Company General Unsecured Creditors Trust to serve as the claims and noticing agent in accordance with the Motors Liquidation Company GUC Trust Agreement. GCG was also retained by the Motors

Liquidation Company Avoidance Action Trust to serve the defendants in this Adversary Proceeding.

3. On May, 5, 2015, counsel for the Motors Liquidation Company Avoidance Action Trust at the time, Dickstein Shapiro, LLP (“Dickstein Shapiro”), provided GCG with a spreadsheet containing mailing data (the “Data”), including mailing data for GMAM Investments Funds Trust, which GCG used to serve defendants in this Adversary Proceeding. GCG formatted the Data and uploaded it into GCG’s proprietary database. Additionally, on May 5, 2015, Dickstein Shapiro provided GCG with written instructions for service and the method of service, for each defendant in this Adversary Proceeding, including GMAM Investment Funds Trust.

4. In accordance with the instructions received from Dickstein Shapiro, on May 27, 2015, GCG caused true and correct copies of the Stipulation and Order (Adv. Pro. Dkt. 90), First Amended Adversary Complaint (Adv. Pro. Dkt. 91) and Amended Summons and Notice (Adv. Pro. Dkt. 92) to be served by First Class Mail upon GMAM Investment Funds Trust, Attn President, Managing or General Agent, One Lincoln Street, 1st Floor, Boston, MA 02111. (hereafter the “**Lincoln Street Address**”).

5. GCG monitored and tracked mail returned as undeliverable in connection with the documents referenced in paragraph 4. GCG updated Dickstein Shapiro with an undeliverable report with respect to the May 27, 2015 mailing on June 11, 2015, June 26, 2015 and July 27, 2016, and at the direction of Dickstein Shapiro, GCG made additional service attempts on certain defendants to additional addresses.

6. GCG did not receive any notification that its service by First Class Mail upon GMAM Investment Funds Trust to the Lincoln Street Address was returned as undeliverable.

7. GCG followed its standard procedures regarding quality control and review in connection with service of the defendants in this Adversary Proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: October 19, 2016

A handwritten signature in cursive script, appearing to read "Angela Ferrante", written in black ink.

Angela Ferrante