Joshua D. Liston

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UNITED STATES BANKRUPTCY COURT

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Counsel for BTG Pactual Chile S.A. Administradora General De Fondos

SOUTHERN DISTRICT OF NEW YORK Chapter 11 In re: MOTORS LIQUIDATION COMPANY, et al., Case No.: 09-50026 (MG) f/k/a General Motors Corp., et al. Debtors. (Jointly Administered) 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. et al, Defendants.

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE AND SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Beys Liston & Mobargha LLP hereby enters its appearance as counsel for Defendant BTG Pactual Chile S.A. Administradora General de Fondos (formerly known as Celfin Capital S.A. Adm. General de Fondos para Ultra Fondo de Inversion), in the

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above-captioned jointly administered Chapter 11 cases and adversary proceeding number 09-00504 (MG) (the "Adversary Proceeding").

PLEASE TAKE FURTHER NOTICE that Beys Liston & Mobargha LLP requests that all notices given or required to be given and all papers served in the Adversary Proceeding be delivered to and served upon the following:

Joshua D. Liston, Esq. BEYS LISTON & MOBARGHA LLP 825 Third Avenue, 2nd Floor New York, New York 10022 Tel: (646) 755-3601

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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan or reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that is filed or given in connection with these cases and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Notice and Papers, nor any later appearance, pleading, or claim or suit shall constitute (1) a waiver of any available rights or remedies, or (2) a consent to the jurisdiction of this court on any matters relative to jurisdiction, venue, right to trial by jury, right to trial by an Article III court and any and all such similar matters.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance is not and shall not be construed as a waiver of the above-named party's jurisdictional, substantive or

procedural rights and remedies in connection with the above-captioned proceedings, all of which are hereby expressly reserved.

Dated: New York, New York March 31, 2017

Respectfully submitted,

Joshua D. Liston

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