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John J. Zefutie, Jr.

*Counsel for Non-Party Elio Motors, Inc.*

**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.*,

Debtors.

Chapter 11

Case No. 09-50026 (MG)  
(Jointly Administered)

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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,

-against-

JP MORGAN CHASE BANK, N.A., *et al.*,

Defendants.

Adversary Proceeding

Case No. 09-00504 (MG)

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**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that John J. Zefutie, Jr. of Duane Morris, LLP hereby appears in the above-referenced cases as counsel for Non-Party Elio Motors, Inc., and pursuant to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), including Bankruptcy Rules

2002, 3017, 9007, and 9010, request that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned as follows:

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**PLEASE TAKE FURTHER NOTICE** that, pursuant to § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed to be a waiver of any of the rights of Non-Party Elio Motors, Inc., including, without limitation (i) the right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Non-Party Elio Motors, Inc. is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: April 14, 2017

Respectfully submitted,  
**DUANE MORRIS LLP**

By: John J. Zefutie, Jr.  
John J. Zefutie, Jr.

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