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Counsel for Martin Ponce and Kimi L. Hurst, each individually and as a class representative on behalf of all similarly situated persons

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

-----X		
In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

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

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the

United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), the undersigned hereby appear as counsel for Martin Ponce and Kimi L. Hurst, each individually and as a class representative on behalf of all similarly situated persons, and hereby request, pursuant to Bankruptcy Rules 2002, 3017(a) and 9007, that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, or other documents, filed or entered in these Chapter 11 cases (including all papers filed and served in all adversary proceedings in these Chapter 11 Cases, including Adversary Proceeding No. 14-01929), whether sent by the Clerk of the Court, the Debtors or their successors, or any creditor, committee, or any party in interest, be given to and served upon the persons set forth below, and that such names and addresses be added to any master mailing list:

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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code provisions specified above, but also includes all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, 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 affect or seek to affect in any way the rights or interests of the parties specified herein or any other party-in-interest in this proceeding; or require or prohibit, or seek to require or prohibit, any act, delivery of any property, payment or other conduct the parties specified herein or any other party-in-interest.

PLEASE TAKE FURTHER NOTICE that the foregoing simply constitutes a demand and request for service and does not constitute consent to the jurisdiction of the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall constitute a waiver of any (a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b) right to trial by jury in any proceeding as to any and all matters so triable; (c) right to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (d) other rights, claims, actions, defenses, setoffs, recoupments, or other matters under any agreement, law or

equity. All such rights hereby are reserved and preserved without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these Chapter 11 Cases.

Dated: New York, New York
June 19, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that on June 19, 2014, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing, using the CM/ECF system, on all registered ECF users appearing in the case.

/s/ Gregory K. Arenson
Gregory K. Arenson