Susheel Kirpalani James C. Tecce Julia M. Beskin QUINN EMANUEL URQUHART & SULLIVAN LLP 51 Madison Avenue New York, NY 10010

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al.,

Chapter 11 Case No. 09-50026 (MG) (Jointly Administered)

Debtors.

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Susheel Kirpalani, James C. Tecce, and Julia Beskin of Quinn Emanuel Urquhart & Sullivan, LLP, with offices located at 51 Madison Avenue, 22nd Floor, New York, New York 10010, hereby appear on behalf of General Motors LLC ("New GM") in the above-captioned chapter 11 cases and request that all notices given or required to be given in the above-captioned cases and all papers served in the above-captioned cases (including, but not limited to, all papers filed and served in all adversary proceedings, contested matters, and other proceedings in the above-captioned cases, and all notices mailed only to parties in interest who filed with the Court a request that all notices be mailed to them) be given to and served upon the following attorneys:

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PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any pleading, claim or suit shall waive (1) the right to have final orders in non-core matters entered only after <u>de novo</u> review by a judge of a United States District Court (a "<u>District Court</u>"), (2) the right to trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases, (3) the right to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs or recoupments to which New GM may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that the identified attorneys from Quinn Emanuel consent to e-mail service.

Dated: New York, New York September 12, 2017

Respectfully submitted,

By: /s/ JAMES C. TECCE

Susheel Kirpalani James C. Tecce Julia M. Beskin

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