

DRINKER BIDDLE & REATH LLP

1177 Avenue of the Americas
41st Floor
New York, New York 10036-2714
Telephone: (212) 248-3140
Facsimile: (212) 248-3141
E-mail: kristin.going@dbr.com
marita.erbeck@dbr.com
Kristin K. Going
Marita S. Erbeck

*Attorneys for Wilmington Trust Company,
as Motors Liquidation Company
GUC Trust Administrator and Trustee*

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

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

**DESIGNATION BY APPELLEE WILMINGTON TRUST COMPANY,
AS MOTORS LIQUIDATION COMPANY GUC TRUST ADMINISTRATOR
AND TRUSTEE, OF ADDITIONAL ITEMS TO BE INCLUDED
IN THE RECORD ON APPEAL**

Pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure, Wilmington Trust Company, as Motors Liquidation Company GUC Trust Administrator and Trustee (“Appellee”), by its undersigned counsel, respectfully submits the following counter-designation of additional items for inclusion in the record on appeal in connection with the appeal by Celestine and Lawrence Elliott (“Appellants”) of the United States Bankruptcy Court for the Southern District of New York’s (the “Bankruptcy Court”) *Memorandum Opinion and Order*

Denying Motion to Permit Filing of Late Claim, entered May 28, 2019 [ECF No. 14516] (the “Memorandum Opinion”).

**COUNTER-DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED
IN THE RECORD ON APPEAL**¹

Appellee hereby designates the following items, all of which appear on the docket in the Bankruptcy Case, to be included in the record on appeal in addition to the items designated by Appellants:

Item No.	ECF No.	Date	Description
1	3940	09/02/09	Debtors’ Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof
2	3997	09/09/09	Objection of the Ad Hoc Committee of Asbestos Personal Injury Claimants to Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3), Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof
3	14395	12/21/18	Transcript of Case Management Conference Before The Honorable Martin Glenn, United States Bankruptcy Court Judge

RESERVATION OF RIGHTS

Appellee expressly reserves, and does not waive, the right to amend, supplement, or otherwise modify the foregoing designations, and/or to object to or move to strike any item

¹ For the avoidance of doubt, the items designated herein for the record on appeal shall include all exhibits, submissions, appendices, and/or other related documents filed with each item and, with respect to hearing transcripts or other transcripts of proceedings designated herein, any and all documents admitted into evidence at such hearing or other proceeding.

designated for inclusion in the record on appeal by any other party. This filing is made expressly subject to, and without waiver of any and all rights, remedies, challenges, and objections.

Dated: New York, New York
July 9, 2019

DRINKER BIDDLE & REATH LLP

By: /s/ Kristin K. Going
Kristin K. Going
Marita S. Erbeck
1177 Avenue of the Americas
41st Floor
New York, NY 10036-2714
Tel: (212) 248-3140
E-mail: kristin.going@dbr.com
marita.erbeck@dbr.com

*Attorneys for Wilmington Trust Company,
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