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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, et al.,

Debtors.

OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF MOTORS LIQUIDATION COMPANY f/k/a GENERAL MOTORS CORPORATION,

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various lenders party to the Term Loan Agreement described herein, *et al.*,

Defendants.

Chapter 11 Case

Case No. 09-50062 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE

I, Edward F. Haber, request admission, pro hac vice, before the Honorable Robert E.

Gerber, to represent the Employees' Retirement System of the City of Montgomery ("Montgomery"), a defendant in the above-captioned adversary proceeding.

I certify that I am a member in good standing of the bar in the Commonwealth of Massachusetts, the United States District Court for the District of Massachusetts, the United States Court of Appeals for the First Circuit, and the United States Supreme Court.

I have electronically submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: August 12, 2015

Boston, MA

Respectfully submitted,

/s/ Edward F. Haber_

Edward F. Haber Shapiro Haber & Urmy LLP Seaport East Two Seaport Lane Boston, MA 02210 ehaber@shulaw.com (617) 439-3939 09-00504-reg Doc 150-1 Filed 08/12/15 Entered 08/12/15 14:36:02 Proposed Order Pg 1 of 2

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, et al.,

Debtors.

OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF MOTORS LIQUIDATION COMPANY f/k/a GENERAL MOTORS CORPORATION,

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various lenders party to the Term Loan Agreement described herein, *et al.*,

Defendants.

Chapter 11 Case

Case No. 09-50062 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

[PROPOSED] ORDER GRANTING MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE

Upon the motion of Edward F. Haber, to be admitted, *pro hac vice*, to represent the Employees' Retirement System of the City of Montgomery ("Montgomery"), a defendant in the aboved-captioned adversary proceeding, and upon the movant's certification that he is a member in good standing of the bar in the Commonwealth of Massachusetts, the United States District Court for the District of Massachusetts, the United States Court of Appeals for the First Circuit, and the United States Supreme Court.], it is hereby

ORDERED, that Edward F. Haber is admitted to practice, *pro hac vice*, in the abovecaptioned adversary proceeding to represent Montgomery in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid. Dated: _____, 2015 New York, New York SO ORDERED

Honorable Robert E. Gerber United States Bankruptcy Judge