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*Attorneys for Certain Term Loan Investor Defendants*¹

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,

Debtors.

Chapter 11 Case

Case No. 09-50026 (REG)

(Jointly Administered)

MOTORS LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST, by and
through the Wilmington Trust Company, solely
in its capacity as Trust Administrator and
Trustee,

Plaintiff,

-against-

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

Defendants.

Adversary Proceeding

Case No. 09-00504 (REG)

¹ Many of the names the plaintiff alleged for the defendants in the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* (the “**Amended Complaint**”) (ECF No. 91) include inaccuracies and therefore some of the defendants use names in this *Amended Notice of Appearance and Request for Notices and Service of Papers* (the “**Notice**”) that differ from the name used by plaintiff in the Amended Complaint. To the extent there is a difference, this Notice is filed on behalf of the correct party defendant.

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

PLEASE TAKE NOTICE that the law firm of **Hahn & Hessen LLP** hereby appears in the above-captioned adversary proceeding as counsel for the parties listed on the list annexed hereto and requests, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and sections 102(1), 342 and 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), that all notices given or required to be given in connection with this proceeding, and all papers served or required to be served in connection therewith, be given and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed in this proceeding whether such notice is formal or informal, written or oral, and whether transmitted by hand delivery, United States Mail, electronic mail, expedited delivery service, telephone, telex, telecopy or otherwise.

Dated: New York, New York
November 16, 2015

HAHN & HESSEN LLP

By: /s/ Mark T. Power

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A Member of the Firm

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Counsel to Bechtel Trust & Thrift Plan & Master Trust for Certain Tax Qualified Bechtel Retirement Plans; GoldenTree Loan Opportunities III, Ltd.; GoldenTree Loan Opportunities IV, Ltd.; Arch Reinsurance Ltd.; Coca-Cola Company Retirement & Master Trust; Caterpillar Master Retirement Trust; J.C. Penney Corporation, Inc. Pension Plan Trust; Stichting Pensioenfonds Hoogovens; Stichting Bewaarder Syntrus Achmea Global High Yield Pool f/k/a Stichting Bewaarder Interpolis Pensioenen Global High Yield Pool; DDJ High Yield Fund; Stichting Pensioenfonds Metaal en Techniek²; Shinnecock CLO II, Ltd.; Kynikos Opportunity Fund II LP; Kynikos Opportunity Fund International Limited; Kynikos Opportunity Fund LP; Debello Investors LLC; Wexford Catalyst Investors LLC; Wexford Spectrum Investors LLC; St. Luke's Health System Corporation, as successor to St. Luke's Episcopal Health System Foundation; Master Trust Pursuant to the Retirement Plans of APL LTD and Subsidiaries; Employees' Retirement System of Baltimore County; Board of Pensions of the Presbyterian Church (U.S.A.); Building Trades United Pension Trust Fund; Carpenters Pension Fund of Illinois; The Children's Hospital of Philadelphia Foundation; Connecticut General Life Insurance Company In Respect of Its Separate Account 4828CP; Retirement Board of the Park Employees' and Retirement Board Employees' Annuity and Benefit Fund of Chicago; Cummins Inc. and Affiliates Collective Investment Trust; The Duchossois Group Inc. Pension Trust; Emerson Electric Co. Retirement Master Trust; Inter-Local Pension Fund of the Graphic Communications Conference of the International Brotherhood of Teamsters; Taxable Fixed Income Managers: Portfolio 1 [Series] f/k/a Goldman Sachs GMS Core Plus Fixed Income Portfolio; Halliburton Company Employee

² Solely with respect to assets managed by DDJ Capital Management, LLC.

Benefit Master Trust; Health Care Foundation of Greater Kansas City; Eighth District Electrical Pension Fund; ILWU/PMA Pension Plan Trust; State of Indiana Major Moves Construction Fund; Indiana Public Retirement System; Indiana State Police Pension Trust; Kraft Foods Global, Inc. & Kraft Foods Master Retirement Trust; Board of Fire and Police Pension Commissioners of the City of Los Angeles; Louisiana Carpenters Regional Council Pension Trust; Municipal Employees' Retirement System of Michigan; City of Milwaukee Employes' Retirement System; Montana Board of Investments; Mather Foundation; Reams – Prudential Retirement Insurance & Annuity Company, on behalf of Separate Account SA-18; Purdue University; The Rotary Foundation; Columbus Unconstrained Bond Fund (formerly Reams Unconstrained Bond Fund); Santa Barbara County Employees' Retirement System; Sonoma County Employees' Retirement Association; Scout Core Plus Bond Fund (formerly Frontegra Columbus Core Plus Bond Fund); Seattle City Employees' Retirement System; Indiana University; University of Kentucky; Ventura County Employees' Retirement Association; Bill & Melinda Gates Foundation Trust; and Vulcan Ventures, Inc.

LIST OF TERM LOAN INVESTOR DEFENDANTS

<u>Correct Name of Entity</u>	<u>Entity as Identified in the First Amended Complaint</u>
Bechtel Trust & Thrift Plan & Master Trust for Certain Tax Qualified Bechtel Retirement Plans	<ul style="list-style-type: none"> • Bechtel Trust & Thrift Plan Becon Trust & Thrift Plan • Logan Circle – Bechtel Corporation³
GoldenTree Loan Opportunities III, Ltd.	Goldentree Loan Opportunities III, Ltd.
GoldenTree Loan Opportunities IV, Ltd.	Goldentree Loan Opportunities IV, Ltd.
Arch Reinsurance Ltd.	Arch Reinsurance Ltd.
Coca-Cola Company Retirement & Master Trust	<ul style="list-style-type: none"> • Coca Cola Co Ret & MSTR Tr • The Assets Management Committee of the Coca-Cola Company Master Retirement Trust
Caterpillar Master Retirement Trust	DDJ Cap – Caterpillar Master Retirement Trust
J.C. Penney Corporation, Inc. Pension Plan Trust	DDJ – JC Penny Pension Plan Trust
Stichting Pensioenfond Hoogovens	DDJ – Stichting Pensioenfond Hoogovens
Stichting Bewaarder Syntrus Achmea Global High Yield Pool f/k/a Stichting Bewaarder Interpolis Pensioenen Global High Yield Pool	DDJ Cap MGMT – Stichting Bewaarder Interpolis Pensioenen
DDJ High Yield Fund	DDJ High Yield Fund
Stichting Pensioenfond Metaal en Techniek	Stichting Pensionfond Me ⁴
Shinnecock CLO II, Ltd.	Shinnecock CLO II Ltd.
Kynikos Opportunity Fund II LP	Kynikos Opportunity Fund II LP
Kynikos Opportunity Fund International Limited	Kynikos Opportunity Fund International Ltd.
Kynikos Opportunity Fund LP	Kynikos Opportunity Fund LP
Debello Investors LLC	Debello Investors LLC
Wexford Catalyst Investors LLC	Wexford Catalyst Investors
Wexford Spectrum Investors LLC	Wexford Spectrum Investors LLC

³ Solely with respect to the term debt held by Bechtel Trust & Thrift Plan & Master Trust for Certain Tax Qualified Bechtel Retirement Plans.

⁴ Solely with respect to assets managed by DDJ Capital Management, LLC.

St. Luke's Health System Corporation, as successor to St. Luke's Episcopal Health System Foundation	<ul style="list-style-type: none"> • Pimco – St. Luke Episcopal Health System Foundation • Reams – St. Luke Episcopal Health System Foundation
Master Trust Pursuant to the Retirement Plans of APL LTD and Subsidiaries	<ul style="list-style-type: none"> • Reams – American President Lines Ltd. • Reams – Master Trust Pursuant to the Retirement Plans of APL Ltd. & Subsidiaries
Employees' Retirement System of Baltimore County	<ul style="list-style-type: none"> • Reams – Baltimore County Retirement • Reams – Employees' Retirement System of Baltimore County
Board of Pensions of the Presbyterian Church (U.S.A.)	Reams – Board of Pen Presbyterian Church
Building Trades United Pension Trust Fund	Reams – Building Trades United Pension Trust
Carpenters Pension Fund of Illinois	<ul style="list-style-type: none"> • Reams – Carpenters Pension Fund of Illinois • Reams – Carpenters Pension Fund of Illinois Pension Plan
The Children's Hospital of Philadelphia Foundation	<ul style="list-style-type: none"> • Reams Children's Hospital Fund • Reams – Children's Hospital Philadelphia • The Children's Hospital Foundation
Connecticut General Life Insurance Company In Respect of Its Separate Account 4828CP	Reams – Connecticut General Life Insurance Company
Retirement Board of the Park Employees' and Retirement Board Employees' Annuity and Benefit Fund of Chicago	<ul style="list-style-type: none"> • Reams – Chicago Park District • Reams – Retirement Board of the Park Employees Annuity & Benefit Fund
Cummins Inc. and Affiliates Collective Investment Trust	Reams – Cummins Inc. & Affiliates Collective Investment Trust
The Duchossois Group Inc. Pension Trust	<ul style="list-style-type: none"> • Reams – Duchossois Ind. Inc. • The Duchossois Group Inc.
Emerson Electric Co. Retirement Master Trust	<ul style="list-style-type: none"> • Reams – Emerson Electric • Reams – Emerson Electric Company Retirement Master Trust
Inter-Local Pension Fund of the Graphic	Reams – Inter Local Pension Fund of the

Communications Conference of the International Brotherhood of Teamsters	Graphic Comm. International Brotherhood of Teamsters
Taxable Fixed Income Managers: Portfolio 1 [Series] f/k/a Goldman Sachs GMS Core Plus Fixed Income Portfolio	Reams – Goldman Core Plus Fixed
Halliburton Company Employee Benefit Master Trust	<ul style="list-style-type: none"> • Reams – Halliburton Company • Reams – Halliburton Company Employee Benefit Master Trust
Health Care Foundation of Greater Kansas City	<ul style="list-style-type: none"> • Health Care Foundation of Greater Kansas City • Reams – Health Care Foundation of Greater Kansas City
Eighth District Electrical Pension Fund	Reams – Eight District Electrical Pension Fund
ILWU/PMA Pension Plan Trust	<ul style="list-style-type: none"> • Reams – ILWU/PMA • Reams – ILWU/PMA Pension Plan
State of Indiana Major Moves Construction Fund	<ul style="list-style-type: none"> • Reams – St. Indiana Major Moves • Reams – State of Indiana Major Moves Construction Fund • State of Indiana Major Moves
Indiana Public Retirement System	Reams Indiana State Teachers Retirement Fund
Indiana State Police Pension Trust	<ul style="list-style-type: none"> • Reams – Indiana State Police • Reams Indiana State Police Pension Fund • Reams Indiana State Police Pension Trust
Kraft Foods Global, Inc. & Kraft Foods Master Retirement Trust	<ul style="list-style-type: none"> • Kraft Foods Global Inc. • Reams Kraft Foods Global Inc. • Reams – Kraft Foods Master Retirement Trust
Board of Fire and Police Pension Commissioners of the City of Los Angeles	<ul style="list-style-type: none"> • Reams Board of Fire & Police Pension Commissioners of the City of Los Angeles • Reams – LA Fire & Police
Louisiana Carpenters Regional Council Pension Trust	<ul style="list-style-type: none"> • Louisiana Carpenters Regional Council Pension Trust Fund

	<ul style="list-style-type: none"> • Reams Louisiana Carpenters Regional Council Pension Trust Fund
Municipal Employees' Retirement System of Michigan	Reams Municipal Employee Retirement System of Michigan
City of Milwaukee Employees' Retirement System	<ul style="list-style-type: none"> • City of Milwaukee Employees Retirement System • City of Milwaukee Retirement System • Reams City of Milwaukee Retirement System • Reams – Employees' Retirement System of the City of Milwaukee
Montana Board of Investments	<ul style="list-style-type: none"> • Montana Board of Investments • Reams Montana Board of Investments
Mather Foundation	<ul style="list-style-type: none"> • Reams – The Mather Foundation Core Plus • The Mather Foundation
Reams – Prudential Retirement Insurance & Annuity Company, on behalf of Separate Account SA-18	Reams – Prudential Retirement Insurance & Annuity Company
Purdue University	Reams – Trustees of Purdue University
The Rotary Foundation	<ul style="list-style-type: none"> • Reams – Rotary International Foundation • Reams – The Rotary Foundation
Columbus Unconstrained Bond Fund (formerly Reams Unconstrained Bond Fund)	<ul style="list-style-type: none"> • Reams – Columbus Extended Market Fund LLC • Reams Unconstrained Bond Fund LLC
Santa Barbara County Employees' Retirement System	<ul style="list-style-type: none"> • Reams – Santa Barbara County • Reams – Santa Barbara County Employees' Retirement System • Santa Barbara County
Sonoma County Employees' Retirement Association	Reams – Sonoma County Employees Retirement Association
Scout Core Plus Bond Fund (formerly Frontegra Columbus Core Plus Bond Fund)	Reams – Frontegra Columbus Core Plus Fund
Seattle City Employees' Retirement System	<ul style="list-style-type: none"> • Reams – Seattle City Employee's Retirement System • Seattle City Employees' Retirement

	System
Indiana University	<ul style="list-style-type: none"> • Indiana University • Reams – Indiana University • Reams Trustees of Indiana University
University of Kentucky	Reams – University of Kentucky
Ventura County Employees’ Retirement Association	Reams – Ventura County Employees’ Retirement Association
Bill & Melinda Gates Foundation Trust	<ul style="list-style-type: none"> • Oaktree – Bill & Melinda Gates Foundation Trust • Reams – Bill & Melinda Gates Foundation Trust • Wells – 14945000 • Wells Capital Management 18866500
Vulcan Ventures, Inc.	Vulcan Ventures Inc.