GOULSTON & STORRS, P.C. 400 Atlantic Avenue Boston, MA 02110 (617) 482-1776 Douglas B. Rosner (DR-5690) Gregory O. Kaden (GK-9610) Counsel to 767 Fifth Partners LLC and BP/CGCenter I LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: : Chapter 11

MOTORS LIQUIDATION COMPANY, et al. : Case No. 09-50026 (REG)

(Jointly Administered)

Debtors. :

MOTION PURSUANT TO RULE 2090-1(b) OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK FOR ADMISSION TO PRACTICE PRO HAC VICE

I, Gregory O. Kaden, a member in good standing of the bar of the Commonwealth of Massachusetts and, *inter alia*, the United States District Court for the District of Massachusetts, request admission, *pro hac vice*, before the Honorable Robert E. Gerber in the above captioned chapter 11 cases. My address is Goulston & Storrs, P.C., 400 Atlantic Avenue, Boston, MA 02110-3333; email address is gkaden@goulstonstorrs.com; and telephone number is (617) 482-1776.

I agree to pay the fee of \$25 upon approval by this Court admitting me to practice *pro hac vice*.

Dated: New York, New York

July 29, 2009

Respectfully submitted,

/s/ Gregory O. Kaden

Gregory O. Kaden (GK-9610) GOULSTON & STORRS, P.C.

400 Atlantic Avenue

Boston, Massachusetts 02110-3333

Tel: (617) 482-1776 gkaden@goulstonstorrs.com

ORDER

ORDERED, that Gregory O. Kaden, Esq. is admitted to practice, pro hac vice, in

the above-captioned Case in the United States Bankruptcy Court, Southern District of

New York, subject to payment of the filing fee.

Dated: New York, New York

July ___, 2009

United States Bankruptcy Judge

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GOULSTON & STORRS, P.C. 400 Atlantic Avenue Boston, MA 02110 (617) 482-1776 Douglas B. Rosner (DR-5690) Gregory O. Kaden (GK-9610) Counsel to 767 Fifth Partners LLC and BP/CGCenter I LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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Debtors. :

CERTIFICATE OF SERVICE

I, Gregory O. Kaden, hereby certify that on this 29th day of July, I caused to be served a copy of the *Motion Pursuant to Rule 2090-1(b) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York for Admission to Practice Pro Hac Vice* on the parties set forth on the attached Service List via ECF

/s/ Gregory O. Kaden

Gregory O. Kaden, Esq. (GK-9610) GOULSTON & STORRS, P.C. 400 Atlantic Avenue Boston, MA 02110-3333

Tel: (617) 482-1776 Fax: (617) 574-4112

Service List

Stephen Karotkin, Esq. Weil Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 Counsel to the Debtors	Office of the United States Trustee 33 Whitehall Street, 21 st Floor New York, NY 10004
Gordon Z. Novod, Esq. Kramer Levin Naftalis & Frankel LLP 1177 Avenue of the Americas New York, NY 10036 Counsel to the Official Committee of Unsecured Creditors	