

George F. Sanderson III  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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	)	
In re:	)	Chapter 11
	)	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	)	Case No. 09-50026 (REG)
	)	
Debtors.	)	
	)	
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**NOTICE OF APPEARANCE AND  
REQUEST FOR NOTICES**

**PLEASE TAKE NOTICE** that Crymes Landfill PRP Group hereby enters its appearance by and through its counsel, Ellis & Winters LLP, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and that such party in interest hereby requests, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b) of the Bankruptcy Code, that the names of the undersigned representatives be added to the mailing list maintained by the Clerk in the above-captioned cases, and that the Clerk and all other parties-in-interest in these cases provide all notices and all papers served on any party, filed with the Court or delivered to the Office of the United States Trustee in the above-captioned cases, as listed directly below:

George F. Sanderson III (george.sanderson@elliswinters.com)  
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Counsel further requests that the Debtors' Noticing Agent add this Notice of Appearance to the Master Service List.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes all of the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, cash-flow reports, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these cases and any proceeding therein, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex, or otherwise filed or given with regard to the above referenced cases and the proceedings therein, all of which shall be sent to all of the attorneys listed above.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive any right of Crymes Landfill PRP Group (i) to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) to rights, claims, actions, defenses, setoffs, recoupments, or remedies to which Crymes Landfill

PRP Group is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies are expressly reserved hereby.

Dated: Raleigh, North Carolina  
October 15, 2009

/s/ George F. Sanderson III  
George F. Sanderson III  
ELLIS & WINTERS, LLP  
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Raleigh, North Carolina 27615  
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george.sanderson@elliswinters.com  
*Attorneys for Crymes Landfill PRP Group*

**CERTIFICATE OF SERVICE**

I, George F. Sanderson III of ELLIS & WINTERS LLP, hereby certify:

That I am, and at all times hereinafter-mentioned was, more than eighteen (18) years of age;

That on the 15th day of October, 2009, copies of the foregoing Notice of Appearance and Request for Notices were served by CM/ECF upon all parties receiving notices via the Court's CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: Raleigh, North Carolina  
October 15, 2009

/s/ George F. Sanderson III  
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