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Bruce R. Zirinsky, Esq.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-			
n	re:		
	11.		

MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al.,

Debtor.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears in this case as attorneys for Green Hunt Wedlake, Inc., as bankruptcy trustee appointed on October 9, 2009, by the Supreme Court of Nova Scotia in Bankruptcy and Insolvency in the Matter of the Bankruptcy of General Motors Nova Scotia Finance Company pending under the Bankruptcy and Insolvency Act (Canada), Court No. 34181, Estate No. 51-125147, Hfx. No. 318069 (the "Trustee") with respect to the Trustee's amended proof of claim filed against Motors Liquidation Company, et al., f/k/a General Motors Corporation, and requests as provided in 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b) (the "Bankruptcy Rules") that all notices given or required to be given, and all papers served or required to be served, be given to and served upon:

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PLEASE TAKE FURTHER NOTICE that pursuant to 11 U.S.C. § 1109(b),

this request includes not only the notices and papers referred to in the Bankruptcy Rules

specified above, but also includes, without limitation, orders and notices of any

application, motion, petition, pleading, request, complaint or demand, whether formal or

informal, whether written or oral, whether transmitted or conveyed by mail, courier

service, hand-delivery, telephone, facsimile transmission, telegraph, telex, email, Internet,

or otherwise filed or made with regard to the above-captioned case, or that affects or

seeks to affect in any way any rights or interests of any party in interest in this case.

PLEASE TAKE FURTHER NOTICE that demand is also made that the

undersigned be added to the notice list for notice of all contested matters, adversary

proceedings, and other proceedings in the referenced chapter 11 cases.

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 the Trustee's: (i) right to have final orders in non-core matters entered only after de

novo review by a district judge; (ii) right to trial by jury in any proceeding so triable

herein or in any case, controversy or proceeding related hereto; (iii) right to have the

reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which it is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly

are reserved.

Dated: New York, New York

December 3, 2009

GREENBERG TRAURIG, LLP

By: <u>/s/ Bruce R. Zirinsky</u> Bruce R. Zirinsky 200 Park Avenue New York, New York 10166 (212) 801-9200 (Tel) (212) 801-6400 (Fax) Zirinskyb@gtlaw.com

Attorneys for Green Hunt Wedlake, Inc., as Trustee

CERTIFICATE OF SERVICE

The undersigned, an attorney admitted to practice before this Court, hereby

certifies that a true and correct copy of the pre-fixed Notice of Appearance

and Request for Service of Papers was served on December 3, 2009, by regular mail

upon the parties listed on the attached Exhibit A, and by electronic mail upon the parties

listed on the attached Exhibit B.

Dated:

New York, New York

December 3, 2009

/s/ Michele Angell

Michele Angell

EXHIBIT A

CORE MASTER SERVICE LIST

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Exhibit B

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