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*Attorney for Balintulo Plaintiffs*

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

**In re**

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

**Chapter 11**

**Case No. 09-50026 (REG)**

**Jointly Administered**

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

**PLEASE TAKE NOTICE** that the undersigned appears as counsel to the named-plaintiffs in the matter *Balintulo et al., v. Daimler AG, et al.*, No. 02-MDL-1499 (S.D.N.Y.) Sakwe Balintulo, Dennis Vincent Frederick Brutus, Mark Fransch, Elsie Gishi, Lesiba Kekana, Archington Madondo, Mpho Alfre Masemola, Michael Mbele, Mamosadi Catherine Mlangeni, Reuben Mphela, Thulani Nunu, Thandiwe Shezi, and Thobili Sikani (collectively “*Balintulo Plaintiffs*”), creditors and parties-in-interest in the above captioned matter under Chapter 11 of title 11 of the United States Code and requests, pursuant to all applicable rules of the Federal Rules of Bankruptcy Procedure, that any and all notice given or required to be given, and all papers served or required to be served in the above captioned Chapter 11 matter be given to and served upon:

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This request includes, without limitation, all notices (including those required under all applicable Bankruptcy Rules or ordered by the Court) applications, motions, petitions, orders, pleadings, requests, lists, schedules, statements, complaints and demands, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, facsimile, telecopy, electronic file transfer, telegraph, telex or otherwise.

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 (i) the right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) the right to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related in this case; (iii) adjudication and trial by jury of the above referenced personal injury claims of the *Balintulo* Plaintiffs in the District Court; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, and recoupments to which *Balintulo* Plaintiffs are 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: June 22, 2010  
New York, New York

/s/ Steig Olson  
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