

MOORE & VAN ALLEN PLLC  
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*Attorneys for Phoenix CLO II, Ltd. f/k/a Avenue  
CLO V, Ltd.*

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*

Debtors.

MOTORS LIQUIDATION COMPANY  
AVOIDANCE ACTION TRUST,

Plaintiff

- against -

JP MORGAN CHASE BANK, N.A. *et al.*

Debtors.

Chapter 11

Case No. 09-50026 (MG)

Jointly Administered

Chapter 11

Case No. 09-50026 (REG)

Adversary Proceeding

Jointly Administered

Case No: 09-00504 (MG)

**NOTICE OF APPEARANCE PURSUANT TO  
BANKRUPTCY RULE 9010 AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE THAT Moore & Van Allen PLLC hereby appears as counsel for Phoenix CLO II, Ltd. f/k/a Avenue CLO V, Ltd. Pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Moore & Van Allen PLLC requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given and served upon the undersigned at the following office address:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any orders and notices of any application, order, notice, motion, petition, pleading, request, disclosure statement, plan, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronically, telephone, facsimile or otherwise.

PLEASE TAKE FURTHER NOTICE that this appearance is with reservation of, and shall not constitute any waiver of, any right or ability of Phoenix CLO II, Ltd., to challenge in this action personal jurisdiction over it and sufficiency of any service of process upon it.

Dated: Charlotte, North Carolina

February 13, 2017

/s/ Zachary H. Smith  
Zachary H. Smith (NY Bar No. 4229951)  
Douglas R. Ghidina (NC Bar No. 14109)  
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CLO V, Ltd.*