

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

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In re:

Chapter 11

MOTORS LIQUIDATION COMPANY, f/k/a/  
GENERAL MOTORS CORPORATION, *et al.*,

Case No. 09-50026 (MG)  
(Jointly Administered)

Debtors.

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MOTOR LIQUIDATION COMPANY AVOIDANCE  
ACTION TRUST, by and through the Wilmington Trust  
Company, solely in its capacity as Trust Administrators  
And Trustee,

Plaintiff,

Adversary Proceeding  
Case No. 09-00504 (MG)

against

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

Defendants.

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**MOTION TO WITHDRAW APPEARANCE**

Pursuant to Local Rule 2090-1(e) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, Bruce R. Grace hereby respectfully moves for entry of an order withdrawing his appearance as attorney of record for Immigon Portfolioabbau ag (formerly known as Österreichische Volksbanken Aktiengesellschaft) (“Immigon”) in the above-captioned adversary proceeding. Good cause exists to grant this motion—to wit:

1. Movant has left Lewis Baach Kaufmann Middlemiss PLLC.
2. Immigon will continue to be represented by Jack B. Gordon of Lewis Baach Kaufmann Middlemiss PLLC, and
3. Movant’s withdrawal will not result in prejudice or delay to any party.

Dated: April 12, 2019

Respectfully submitted,

/s/ Bruce R. Grace  
Bruce R. Grace  
LEWIS BAACH KAUFMANN  
MIDDLEMISS PLLC  
1101 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005  
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Attorney for Immigon Portfolioabbau ag

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**[PROPOSED] ORDER GRANTING  
MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

Upon the Motion to Withdraw Appearance filed by Bruce R. Grace, and for good cause  
shown, it is hereby

ORDERED, that Movant's motion is GRANTED.

Dated: \_\_\_\_\_, 2019  
New York, New York

\_\_\_\_\_  
Honorable Martin Glenn  
United States Bankruptcy Judge

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the below date, a copy of the foregoing Motion to Withdraw Appearance was filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: April 12, 2019

/s/ Bruce R. Grace  
Bruce R. Grace