

Jeffrey Rhodes
DICKSTEIN SHAPIRO LLP
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*Attorney for the Motors
Liquidation Company Avoidance
Action Trust, by and through Wilmington
Trust Company, solely in its capacity as
Trust Administrator and Trustee*

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

-----X
In re:

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

Chapter 11

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

Debtors.

-----X

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Jeffrey Rhodes, a member in good standing of the bars of the District of Columbia and the State of Maryland and the bars of the United States Supreme Court, the United States Courts of Appeals for the Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Eighth Circuit and the District of Columbia Circuit, and the United States District Courts for the District of Maryland and the District of Columbia, request admission, *pro hac vice*, before the Honorable Robert Gerber, to represent the Motors Liquidation Company Avoidance Action Trust by and through the Wilmington Trust Company, solely in its capacity as trust administrator and trustee, in the above-captioned bankruptcy case, and in all proceedings arising in, arising under, and related to the above-captioned bankruptcy case.

My address is Dickstein Shapiro LLP, 1825 Eye Street, N.W., Washington, D.C.
20006-5403. My email address is rhodesj@dicksteinshapiro.com. My telephone number is
(202) 420-3150.

The filing fee of \$200.00 has been submitted with this motion for *pro hac vice*
admission.

Dated: Washington, DC
May 11, 2015

DICKSTEIN SHAPIRO LLP

/s/ Jeffrey Rhodes
Jeffrey Rhodes
1825 Eye Street, NW
Washington, DC 20006
Telephone (202) 420-3150
Email: RhodesJ@DicksteinShapiro.com

EXHIBIT A

PROPOSED ORDER

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

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In re:

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

Chapter 11

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

Debtors.
-----x

ORDER GRANTING ADMISSION TO PRACTICE, *Pro Hac Vice*

Jeffrey Rhodes, a member in good standing of the bars of the District of Columbia and the State of Maryland and the bars of the United States Supreme Court, the United States Courts of Appeals for the Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Eighth Circuit and the District of Columbia Circuit, and the United States District Courts for the District of Maryland and the District of Columbia, having requested admission, *pro hac vice*, to represent the Motors Liquidation Company Avoidance Action Trust by and through the Wilmington Trust Company, solely in its capacity as trust administrator and trustee in the above-captioned bankruptcy case; it is hereby

ORDERED, that Jeffrey Rhodes, Esq., is admitted to practice, *pro hac vice*, in the above-captioned bankruptcy case, and in all proceedings arising in, arising under, and related to the above-captioned bankruptcy case in the United States Bankruptcy Court, Southern District of New York, provided that the filing fee has been paid.

Dated: New York, New York
May __, 2015

Honorable Robert Gerber
United States Bankruptcy Judge