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*Counsel for Dr. Steven Groman, Robin DeLuco,  
Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus  
Sullivan, Katelyn Saxson, Amy C. Clinton, and  
Allison C. Clinton, each individually and as a  
class representative on behalf of all similarly  
situated persons*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re:	:
	:
MOTORS LIQUIDATION COMPANY,	:
	:
Debtor.	:
-----X	
STEVEN GROMAN, ROBIN DELUCO	:
ELIZABETH Y. GRUMET, ABC FLOORING,	:
INC., MARCUS SULLIVAN, KATELYN	:
SAXSON, AMY C. CLINTON, AND ALLISON	:
C. CLINTON, on behalf of themselves, and all	:
others similarly situated,	:
	:
Plaintiffs,	:
-v-	:
	:
GENERAL MOTORS LLC,	:
	:
Defendant.	:
-----X	

Chapter 11  
Case No. 09-50026 (REG)  
  
Adv. Pro. No. 14-01929 (REG)  
  
**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE  
OF PAPERS**

**PLEASE TAKE NOTICE** that, pursuant to Rule 9019(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “**Bankruptcy Code**”), the undersigned hereby appear in the above-captioned adversary proceeding (the “**Adversary Proceeding**”) as counsel for Dr. Steven Groman, Robin DeLuco, Elizabeth Y. Grumet, ABC Flooring, Inc., Marcus Sullivan, Katelyn Saxson, Amy C. Clinton, and Allison C. Clinton, each individually and as a class representative on behalf of all similarly situated persons (collectively, the “**Plaintiffs**”), Plaintiffs in this Adversary Proceeding, and, pursuant to Bankruptcy Rules 2002, 3017(a) and 9007, hereby request that all notices given or required to be given and all papers and pleadings served or required to be served in the Adversary Proceeding whether sent by the Clerk of the Court, the Debtors or their successors, or any creditor, committee, or party in interest, be given to and served upon the persons set forth below, and that such names and addresses be added to any master mailing list:

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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices, papers and pleadings referenced in the above-referenced Bankruptcy Rules but also, without limitation, orders on and notices of any motion, application, petition, pleading, or complaint, whether formal or

informal, written or oral, transmitted or conveyed by mail, telephone, telecopy, facsimile, email, or otherwise in this Adversary Proceeding.

**PLEASE TAKE FURTHER NOTICE** that neither this request for notice nor any subsequent appearance, pleading, proof of claim, or other writing or conduct shall constitute a waiver of any: (a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b) rights to trial by jury in any proceeding as to any and all matters so triable; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (d) other rights, claims, actions, defenses, setoffs, recoupments, or other matters under any agreement, law or equity.

Dated: New York, New York  
May 22, 2014

**GOLENBOCK EISEMAN ASSOR  
BELL & PESKOE LLP**

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