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*Counsel for Kynikos Opportunity Fund LP and
Kynikos Opportunity Fund II LP*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

MOTORS LIQUIDATION COMPANY, et al.,

Debtors,

Official Committee of Unsecured Creditors of
MOTORS LIQUIDATION COMPANY, f/k/a
General Motors Corporation,

Plaintiff,

v.

JPMorgan Chase Bank, N.A., et al.,

Defendants.

Chapter 7

Case No. 09-50026 (REG)

Adv. Pro. No. 09-504 (REG)

**NOTICE OF APPEARANCE AND DEMAND FOR NOTICES
AND PAPERS OF ARNOLD & PORTER LLP
AS ATTORNEYS FOR KYNIKOS OPPORTUNITY FUND LP
AND KYNIKOS OPPORTUNITY FUND II LP**

PLEASE TAKE NOTICE that Kynikos Opportunity Fund LP and Kynikos Opportunity Fund II LP hereby appear in the case by their counsel, Arnold & Porter LLP; such counsel hereby enters their appearance pursuant to Section 1109(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 9010(b); and such counsel hereby requests, pursuant, *inter alia*, to Federal Rules of Bankruptcy Procedure 2002, 3017 and 9007 and Sections 342 and 1109(b) of

the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case by given to and served upon:

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PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, plan of reorganization, disclosure statement, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile, or otherwise filed or made in or with regard to the above-referenced case and any adversary proceedings or contested matters therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Kynikos Opportunity Fund LP and Kynikos Opportunity Fund II LP's rights (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceedings related to this case, (3) to have the District Court withdraw the

reference in any matter subject to mandatory or discretionary withdrawal, or (4) to contend that jurisdiction or venue in this Court is improper or inappropriate.

Dated: August 24, 2015
New York, New York

Respectfully submitted,

ARNOLD & PORTER LLP

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