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DAVID CHRISTIAN ATTORNEYS LLC
David Christian (pro hac vice pending)
3515 W. 75th St., Suite 208
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Tel: 913-674-8215

Attorneys for Continental Casualty Company

**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.

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MOTORS LIQUIDATION COMPANY AVOIDANCE
ACTION TRUST, by and through the Wilmington Trust
Company, solely in its capacity as Trust Administrator and
Trustee,

Plaintiff,

Adversary Proceeding
Case No. 09-00504 (REG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

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**MOTION OF DAVID CHRISTIAN
FOR ADMISSION TO PRACTICE *PRO HAC VICE***

I, David Christian, request admission, *pro hac vice*, before the Honorable Robert E.
Gerber, to represent Defendant Continental Casualty Company (“Continental”) in the above-

referenced bankruptcy proceeding and adversary proceeding (Nos. 09-bk-50026 (REG) and 09-ap-00504 (REG)).

1. The name, address, telephone number, and e-mail address of Movant are as follows:

David Christian
DAVID CHRISTIAN ATTORNEYS LLC
3515 W. 75th St., Suite 208
Prairie Village, KS 66208
913-674-8215
dchristian@dca.law

2. I certify that I am a member in good standing of the bar in the State of Kansas, Missouri, Illinois, and various United States District Courts.

3. Movant's practice is concentrated in the areas of bankruptcy, business restructuring, and commercial litigation.

4. Movant has read, is familiar with, and will abide by the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

5. I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

WHEREFORE, Movant respectfully requests the entry of an order authorizing special admission for the limited purpose of appearing in the above-captioned bankruptcy case and related adversary proceedings.

Signed, December 11, 2015

*Co-Counsel for Continental
Casualty Company*

/s/ David Christian

David Christian
DAVID CHRISTIAN ATTORNEYS LLC
3515 W. 75th St. Suite 208
Prairie Village, KS 66208
913-674-8215
dchristian@dca.law

CERTIFICATE OF SERVICE

I, David Christian, hereby certify that on December 11, 2015, I caused a copy of the foregoing proposed Application for Admission Pro Hac Vice to be served via electronic service by the court's CM/ECF system on all counsel of record.

New York, New York, this 11th day of December, 2015

/s/ David Christian
David Christian

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ACTION TRUST, by and through the Wilmington Trust
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Plaintiff,

Adversary Proceeding
Case No. 09-00504 (REG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

-----X

**ORDER GRANTING ADMISSION FOR DAVID CHRISTIAN TO PRACTICE
PRO HAC VICE**

Upon the motion of David Christian, to be admitted *Pro Hac Vice* to represent Continental Casualty Company, a Defendant in the above-captioned bankruptcy and adversary

proceeding (Nos. 09-bk-50026 (REG) and 09-ap-00504 (REG)), and upon the movant's certification that the movant is a member of good standing of the bar in the State of Kansas, Missouri, Illinois, and various United States District Courts, it is hereby

ORDERED that David Christian, Esq. is admitted to practice *Pro Hac Vice* in the above-captioned bankruptcy and adversary proceeding in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

Dated: _____

United States Bankruptcy Judge

CERTIFICATE OF SERVICE

I, David Christian, hereby certify that on December 11, 2015, I caused a copy of the foregoing proposed Order for Admission Pro Hac Vice to be served via electronic service by the court's CM/ECF system on all counsel of record.

New York, New York, this 11th day of December, 2015

/s/ David Christian
David Christian