

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

In re:	:	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
Debtors.	:	(Jointly Administered)
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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,	:	Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (REG)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for various lenders party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

NOTICE OF APPEARANCE

To the Clerk of this Court and all parties of record:

PLEASE TAKE NOTICE that the undersigned counsel, Joseph C. Wylie II of K&L Gates LLP, admitted to practice, *pro hac vice*, in the above referenced adversary proceeding on April 18, 2016, hereby respectfully enters his appearance as counsel of record for Defendants Sanford C. Bernstein Fund Inc. - Intermediate Duration Portfolio, Sanford C. Bernstein Fund Inc. II - Intermediate Duration Institutional Portfolio (named in the Amended Complaint as “Sanford Bernstein II Interim DU”), and Ivy Funds, on behalf of its series, Ivy High Income Fund (named in the Amended Complaint as “Ivy Fund Inc.-High Income Fund” and “Ivy Funds-Ivy High Income Fund”).

NOTICE IS FURTHER GIVEN, that pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, it is requested that all notices given or required to be given in this adversary proceeding, including but not limited to all papers filed and served in this adversary proceeding, be given to and served upon:

K&L GATES LLP
70 West Madison Street, Suite 3100
Chicago, Illinois 60602
Attn: Joseph C. Wylie II
joseph.wylie@klgates.com
(312) 807-4439

NOTICE IS FURTHER GIVEN, that the foregoing request includes not only notices and papers referred to in Rule 2002 of the Federal Rules of Bankruptcy Procedure, but also includes, without limitation, orders and notices of applications, motions, petitions, pleadings, requests, complaints or demands, whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, or otherwise.

The filing of this appearance shall not waive any defenses or arguments that may be available to Defendants Sanford C. Bernstein Fund Inc. - Intermediate Duration Portfolio, Sanford C. Bernstein Fund Inc. II - Intermediate Duration Institutional Portfolio, and Ivy Funds, on behalf of its series, Ivy High Income Fund.

Any and all defenses and/or arguments available to Defendants Sanford C. Bernstein Fund Inc. - Intermediate Duration Portfolio, Sanford C. Bernstein Fund Inc. II - Intermediate Duration Institutional Portfolio, and Ivy Funds, on behalf of its series, Ivy High Income Fund are hereby expressly preserved.

Dated: Chicago, Illinois
April 19, 2016

Respectfully submitted,

/s/ Joseph C. Wylie II
Joseph C. Wylie II
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*Attorneys for Sanford C. Bernstein
Fund Inc. - Intermediate Duration
Portfolio, Sanford C. Bernstein Fund
Inc. II - Intermediate Duration
Institutional Portfolio, and Ivy
Funds, on behalf of its series, Ivy
High Income Fund*