

HEARING DATE AND TIME: January 24, 2019 at 2:00 P.M. (Eastern Time)

OBJECTION DEADLINE: January 17, 2019 at 4:00 P.M. (Eastern Time)

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GUC Trust Administrator*

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

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<b>In re</b>	: Chapter 11 Case No.
	: 09-50026 (MG)
<b>MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al.</b>	: (Jointly Administered)
	: Debtors.
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**NOTICE OF RE-SCHEDULED HEARING ON AND DEADLINE TO OBJECT TO  
MOTION OF WILMINGTON TRUST COMPANY, AS GUC TRUST  
ADMINISTRATOR, FOR AN ORDER (A) GRANTING AUTHORITY TO  
REALLOCATE AND USE DISTRIBUTABLE CASH FOR THE  
PURPOSES OF FUNDING ADMINISTRATIVE AND REPORTING  
FEES, COSTS AND EXPENSES OF THE GUC TRUST AND  
(B) EXTENDING THE DURATION OF THE GUC TRUST**

PLEASE TAKE NOTICE that on December 19, 2018, Wilmington Trust Company, solely in its capacity as trust administrator and trustee (in such capacity, the “GUC Trust Administrator”), of the Motors Liquidation Company GUC Trust (the “GUC Trust”), formed by the above-captioned debtors (collectively, the “Debtors”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan dated March 18, 2011, filed a motion (the “Motion”) for an order, pursuant to sections 105(a) and 1142(b) of title 11 of the United States Code, Rule 9006(b) of the Federal Rules of Bankruptcy Procedure, and sections 4.1 and 6.1 the

Second Amended and Restated Motors Liquidation Company GUC Trust Agreement dated as of July 30, 2015, (A) authorizing the reallocation and use of Distributable Cash (as defined in the Motion) to fund anticipated administrative and reporting fees, costs and expenses of the GUC Trust, and (B) extending the duration of the GUC Trust for an additional 24 months or through and including March 31, 2021, all as more fully described in the Motion. Pursuant to a notice filed the same day, the Motion was originally scheduled to be heard on January 22, 2019 at 2:00 p.m. (Eastern Standard Time).

**PLEASE TAKE FURTHER NOTICE** that, at the request of the Bankruptcy Court, the hearing on the Motion has been re-scheduled to **January 24, 2019 at 2:00 p.m. (Eastern Standard Time)**, or as soon thereafter as counsel may be heard, with said hearing to be held before the Honorable Judge Martin Glenn, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to this Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Drinker Biddle & Reath LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator, 1177 Avenue of the Americas, 41st Floor, New York, New York 10166 (Attn: Kristin K. Going, Esq. & Marita S. Erbeck, Esq.); (ii) FTI Consulting, as the GUC Trust Monitor, 3 Times

Square, 11th Floor New York, NY 10036 (Attn: Conor Tully); (iii) Paul, Weiss, Rifkind, Wharton & Garrison LLP, attorneys for the United States Department of the Treasury, 1285 Avenue of the Americas, New York, NY (Attn: Douglas R. Davis, Esq. and Lauren Shumejda, Esq.); (iv) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Erik Rosenfeld); (v) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); and (vi) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, New York 10014 (Attn: William K. Harrington, Esq.), so as to be received no later than **January 17, 2019 at 4:00 p.m. (Eastern Time)** (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that if no objections are timely filed and served with respect to the Motion, Wilmington Trust Company, acting in its capacity as GUC Trust Administrator may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
December 28, 2018

DRINKER BIDDLE & REATH LLP

By: /s/ Kristin K. Going  
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