

**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)
OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF MOTORS LIQUIDATION COMPANY f/k/a GENERAL MOTORS CORPORATION,	:	Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (REG)
vs.	:	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	:	
Defendants.	:	

**JOINT STIPULATION REQUESTING  
MODIFICATION OF  
STIPULATED SCHEDULING ORDER**

Plaintiff the Official Committee of Unsecured Creditors of Motors Liquidation Company f/k/a General Motors Corporation (the “Committee”) and Defendant JPMorgan Chase Bank, N.A. (“JPMCB”), by and through their undersigned attorneys, hereby stipulate and jointly request the following modifications to the Stipulated Scheduling Order entered by this Court on October 6, 2009 (the “Order”):

WHEREAS, pursuant to the Court's Order, since October 2009, the Committee and JPMCB have diligently engaged in discovery, including but not limited to the production of thousands of pages of documents;

WHEREAS, the Committee and JPMCB have agreed and scheduled multiple depositions and expect to complete all depositions in February 2010;

WHEREAS, the Committee and JPMCB have conferred and agreed to jointly request that the current deadline for making a dispositive motion be extended;

NOW, therefore, the parties stipulate and agree as follows:

1. The deadline for the Committee and/or JPMCB to make a dispositive motion be extended from February 1, 2010 to March 15, 2010;
2. The deadline for filing opposition to any dispositive motion made by the Committee and/or JPMCB be extended from March 1, 2010 to April 15, 2010;
3. The deadline for filing replies to any dispositive motion made by the Committee and/or JPMCB be extended from March 17, 2010 to April 30, 2010;
4. The Committee shall have until thirty (30) days after the date of entry of the Court's decision on any dispositive motion made under this modified Stipulated Scheduling Order to serve the summons and complaint upon other defendants; and
5. All other provisions of the Order are unchanged.

STIPULATED AND AGREED:

Dated: New York, New York  
January 19, 2010

BUTZEL LONG

By: /s/ Eric B. Fisher

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Eric B. Fisher

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Attorneys for Defendant  
Official Committee of Unsecured Creditors of  
Motors Liquidation Company f/k/a General  
Motors Corporation

Dated: New York, New York  
January 19, 2010

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

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Attorneys for Defendant  
JPMorgan Chase Bank, N.A.

SO ORDERED:

s/ Robert E. Gerber 1/20/2009  
UNITED STATES BANKRUPTCY JUDGE