

**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 <i>f/k/a</i> 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
SECOND 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”), as modified by the Joint Stipulation Requesting Modification of Stipulated Scheduling Order entered by this Court on January 20, 2010 (the “Modified Order”):

WHEREAS, on March 8, 2010, the Committee requested a pre-motion conference with the Court pursuant to Local Bankruptcy Rule 7056-1(a);

WHEREAS, the pre-motion conference with the Court is scheduled for March 16, 2010 at 4:00 p.m.;

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 March 15, 2010 to March 22, 2010;
2. The deadline for filing opposition to any dispositive motion made by the Committee and/or JPMCB be extended from April 15, 2010 to April 22, 2010;
3. The deadline for filing replies to any dispositive motion made by the Committee and/or JPMCB be extended from April 30, 2010 to May 7, 2010; and
4. All other provisions of the Order and the Modified Order are unchanged.

STIPULATED AND AGREED:

Dated: New York, New York
March 10, 2010

BUTZEL LONG,
a professional corporation

By: /s/ Barry N. Seidel

Barry N. Seidel (BS 1945)
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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
March 10, 2010

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

John M. Callagy (JC 8166)
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Attorneys for Defendant
JPMorgan Chase Bank, N.A.

SO ORDERED:

s/ Robert E. Gerber 3/15/2010
UNITED STATES BANKRUPTCY JUDGE