

**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 (MG)
Debtors.)	(Jointly Administered)
_____)	
MOTORS LIQUIDATION COMPANY)	
AVOIDANCE ACTION TRUST, by and through)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as)	
Trust Administrator and Trustee,)	Case No. 09-00504 (MG)
Plaintiff,)	
vs.)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	
_____)	

**STIPULATION AND [PROPOSED] ORDER DISMISSING CROSS-CLAIMS
AGAINST JPMORGAN CHASE BANK, N.A. BY IMMIGON PORTFOLIOABBAU AG**

IT IS HEREBY STIPULATED AND AGREED, by and among undersigned counsel, as follows:

1. Immigon Portfolioabbau ag (formerly known as Österreichische Volksbanken Aktiengesellschaft) (“Immigon”) dismisses, without prejudice, the cross-claims it asserted against defendant JPMorgan Chase Bank, N.A. (“JPMCB”) contained in ECF No. 857 dated March 2, 2017 (“Immigon Cross-Claims”).

2. Immigon and JPMCB expressly reserve and preserve any and all rights and defenses each had with respect to the Immigon Cross-Claims as of March 2, 2017, and if Immigon refiles cross-claims on or before December 31, 2017 the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 2, 2017.

Dated: New York, New York
August 22, 2017

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Dated: New York, New York
August 22, 2017

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/s/
MARTIN GLENN
United States Bankruptcy Judge

IT IS SO ORDERED.

Dated: August ____, 2017
New York, New York