

**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 BTG PACTUAL**

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

1. BTG Pactual Chile S.A. Administradora General De Fondos (“BTG Pactual”) dismisses, without prejudice, the cross-claims it asserted against JPMorgan Chase Bank, N.A. (“JPMCB”) contained in ECF No. 913 dated March 31, 2017 (“BTG Pactual Cross-Claims”).

2. BTG Pactual and JPMCB expressly reserve and preserve any and all rights and defenses each had with respect to the BTG Pactual Cross-Claims as of March 31, 2017, and if BTG Pactual refiles cross-claims on or before January 31, 2018 the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 31, 2017.

Dated: New York, New York
October 24, 2017

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

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Dated: New York, New York
October 24, 2017

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*Attorney for Defendant and Cross-Claimant
BTG Pactual Chile S.A. Administradora
General De Fondos*

/s/

MARTIN GLENN

United States Bankruptcy Judge

IT IS SO ORDERED.

Dated: October ____, 2017
New York, New York