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

In re:)	Chapter 11
)	
MOTORS LIQUIDATION COMPANY, <i>et</i>)	Case No. 09-50026 (REG)
<i>al.</i> ,)	
)	
Debtors.)	(Jointly Administered)
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OFFICIAL COMMITTEE OF)	
UNSECURED CREDITORS OF)	
MOTORS LIQUIDATION COMPANY)	
f/k/a GENERAL MOTORS)	
CORPORATION,)	
)	
Plaintiff,)	
)	
vs.)	Adversary Proceeding No. 09-00504 (REG)
)	
JPMORGAN CHASE BANK, N.A.,)	
individually and as Administrative Agent)	
for various lenders party to the Term Loan)	
Agreement described herein, <i>et al.</i> ,)	
)	
Defendants.)	

**MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

Indiana University (“IU”) respectfully requests the entry of an Order extending the time in which IU may respond to the *First Amended Adversary Complaint For (1) Avoidance of Unperfected Lien, (2) Avoidance And Recovery Of Postpetition Transfers, (3) Avoidance And*

Recovery Of Preferential Payments, And (4) Disallowance Of Claims By Defendants (the "Complaint") filed by the Official Committee Of Unsecured Creditors Of Motors Liquidation Company f/k/a General Motors Corporation (the "Plaintiff"). In support of its motion, IU states:

1. Plaintiff filed its Complaint on May 20, 2015. The clerk issued the *Amended Summons And Notice Of Pretrial Conference In An Adversary Proceeding* ("Summons") on May 26, 2015. Plaintiff served the Summons and Complaint on May 27, 2015.

2. If properly served, IU's deadline to respond to the Complaint is June 25, 2015, which date has not yet passed.

3. IU reasonably requires additional time within which to further investigate the Complaint and file an appropriate response thereto.

4. IU therefore respectfully requests a thirty (30) day extension of time to answer or otherwise respond to the Complaint, up to and including July 25, 2015.

WHEREFORE, IU respectfully requests the entry of an Order extending the time in which IU may answer or otherwise respond to the Complaint, up to and including July 25, 2015, and all other appropriate relief.

Dated: June 24, 2015

FAEGRE BAKER DANIELS LLP

/s/ Michael M. Krauss

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2015, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

/s/ Michael M. Krauss