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July 31, 2018

**By Hand, ECF, and Email**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

Re: *Motors Liquidation Company Avoidance  
Action Trust v. JPMorgan Chase Bank,  
N.A.*, Case No. 09-00504 (MG)

Dear Judge Glenn:

We jointly submit this letter on behalf of our client, JPMorgan Chase Bank, N.A., the other members of Defendants Steering Committee, and plaintiff, the Motors Liquidation Company Avoidance Action Trust.

The Honorable Martin Glenn  
July 31, 2018  
Page 2

In the parties' July 3, 2018 "Updated Joint Status Report" (Dkt. No. 1055), the parties reported that they would endeavor to submit to the Court, on or before July 31, 2018, the following: (a) a proposed joint pre-trial order, (b) pre-motion letters, and (c) a stipulation "memorializ[ing] the agreement that [the Parties] have been able to reach to date, applying the principles in the Court's Memorandum Opinion Regarding Fixture Classification and Valuation," with respect to both fixture classification and valuation.

The parties have reached agreement on a joint pre-trial order, which will be filed today, along with both sides' pre-motion letters.

The parties are, however, continuing to negotiate the stipulation memorializing agreements reached to date and require additional time to finalize that stipulation. The parties will file the stipulation memorializing agreements reached to date, or provide the Court with a further update, on or before August 7, 2018.

The parties are available to answer any questions that the Court may have.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Wolinsky", with a small flourish at the end.

Marc Wolinsky

cc: Counsel of Record (by ECF and email)