

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

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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MOTORS LIQUIDATION COMPANY AVOIDANCE
ACTION TRUST, by and through the Wilmington Trust
Company, solely in its capacity as Trust Administrator and
Trustee,

Adversary Proceeding

Plaintiff,

Case No. 09-00504 (MG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.
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AUGUST 30, 2018 JOINT STATUS REPORT

In the July 31, 2018 “Stipulation and [Proposed] Order Amending and Superseding Certain Prior Orders Regarding Discovery and Scheduling” (Dkt. No. 1059) (the “**Stipulation and Proposed Order**”), the undersigned parties to the Adversary Proceeding (the “**Parties**”) agreed to file monthly reports on the status of mediation efforts on or before the last business day of each month, beginning August 30, 2018. While the Stipulation and Proposed Order was not entered by the Court, consistent with their undertaking, the Parties have conferred among themselves and jointly submit this status report.

STATUS OF MEDIATION EFFORTS

On August 29, 2018, the Parties participated in a mediation session with Marc Isserles of JAMS concerning a category of disputed assets that Plaintiff has classified as “portable” assets.

The mediation resolved a limited number of the disputes, which will be memorialized in a supplement to the Stipulation and Order Regarding Fixture Classification and Valuation (Dkt. No. 1073).

The Parties are currently preparing for the next mediation session to be held on September 27, 2018, also with Marc Isserles of JAMS. The next mediation session will address certain discrete valuation disputes as well as the collateral status and valuation of disputed assets that Plaintiff has asserted are not fixtures because, according to Plaintiff, they are intangible. Defendants dispute Plaintiff's characterization of these assets.

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

Dated: New York, New York
August 30, 2018

New York, New York
August 30, 2018

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