

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

----- x

| | |
|--|--|
| In re: | Chapter 11 |
| MOTORS LIQUIDATION COMPANY, f/k/a GENERAL MOTORS CORPORATION, <i>et al.</i> , | Case No. 09-50026 (MG) (Jointly Administered) |
| Debtors. | |

----- x

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

----- x

**STIPULATION AND ORDER AMENDING THE
SEPTEMBER 14, 2018 SCHEDULING ORDER (ECF NO. 1080)**

WHEREAS, on September 14, 2018, the Court entered a *Stipulation and order Amending and Superseding Certain Prior Orders Regarding Discovery and Scheduling* (ECF No. 1080) (the “September 14, 2018 Scheduling Order”), setting forth the schedule for ongoing proceedings on Motion Issues, Initial Discovery and Trial Issues, and Final Discovery and Trial Issues (all capitalized terms not defined herein have the meanings defined in the September 14, 2018 Scheduling Order);

WHEREAS, pursuant to the September 14, 2018 Scheduling Order, the Plaintiff and the members of the Defendants’ Steering Committee have been diligently working to obtain the necessary document discovery related to Initial Discovery and Trial Issues from third-parties but

will not be able to complete document discovery on or before October 31, 2018, as set forth in the September 14, 2018 Scheduling Order because of delays in third-party productions;

WHEREAS, good cause exists for amending the document and fact discovery deadlines and the expert witness disclosure deadline related to Initial Discovery and Trial Issues because doing so will permit all parties opportunity to complete discovery, without otherwise impacting the September 14, 2018 Scheduling Order;

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the September 14, 2018 Scheduling Order is amended, with respect only to the document and fact discovery deadlines and the expert witness disclosure deadline related to Initial Discovery and Trial Issues, as follows:

| | |
|--------------------------|--|
| November 30, 2018 | Deadline for document discovery related to Initial Discovery and Trial Issues |
| December 21, 2018 | Deadline for fact discovery related to Initial Discovery and Trial Issues; Deadline to disclose expert witnesses and topics that will be the subject of expert testimony |

Except as set out herein, the Court's September 14, 2018 Scheduling Order remains in full force and effect.

Dated: New York, New York
October 10, 2018

New York, New York
October 10, 2018

BINDER & SCHWARTZ LLP

WACHTELL, LIPTON, ROSEN & KATZ

By: /s/ Eric B. Fisher
Eric B. Fisher
Neil S. Binder
Lindsay A. Bush
Lauren K. Handelsman
366 Madison Avenue, 6th Floor
New York, New York 10017
Telephone: (212) 510-7008
Facsimile: (212) 510-7299
Email: efisher@binderschwartz.com

By: /s/ Marc Wolinsky
Harold S. Novikoff
Marc Wolinsky
Amy R. Wolf
51 West 52nd Street
New York, New York 10019
Telephone: (212) 403-1000
Email: MWolinsky@wlrk.com

*Attorneys for Plaintiff Motors Liquidation
Company Avoidance Action Trust*

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy
John M. Callagy
Nicholas J. Panarella
Martin A. Krolewski
101 Park Avenue
New York, New York 10178
Telephone: (212) 808-7800
Email: jcallagy@kelleydrye.com

JONES DAY

By: /s/ C. Lee Wilson
C. Lee Wilson
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3885
Email: clwilson@jonesday.com

Attorneys for Defendant JPMorgan Chase Bank, N.A.

**KASOWITZ BENSON TORRES & FRIEDMAN
LLP**

By: /s/ Andrew K. Glenn

Andrew K. Glenn
Joshua N. Paul
Michelle G. Bernstein
Frank S. DiCarlo
1633 Broadway
New York, New York 10019
(212) 506-1700
Email: aglenn@kasowitz.com
Email: jpaul@kasowitz.com
Email: mgenet@kasowitz.com
Email: fdicarlo@kasowitz.com

*Attorneys for the Ad Hoc Group of Term Lenders
listed in Appendix A to Dkt. No. 670*

HAHN & HESSEN LLP

By: /s/ Mark T. Power

Mark T. Power
Alison M. Ladd
488 Madison Avenue
New York, New York 10022
Telephone: (212) 478-7200
Email: mpower@hahnessen.com
Email: aladd@hahnessen.com

*Attorneys for Certain Term Loan Investor Defendants
identified on Exhibit 1 to Dkt. No. 788*

DAVIS POLK & WARDWELL LLP

By: /s/ Elliot Moskowitz
Elliot Moskowitz
Marc J. Tobak
M. Nick Sage
450 Lexington Avenue
New York, New York 10017
Email: elliot.moskowitz@davispolk.com
Email: marc.tobak@davispolk.com
Email: m.nick.sage@davispolk.com

*Attorneys for Certain Term Loan Lender
Defendants identified on Exhibit 1 to Dkt. No. 788*

IT IS SO ORDERED.

Dated: October 11, 2018
New York, New York

 /s/ Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge