

**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 EXTENDING TIME TO FILE CROSS-CLAIMS AGAINST
JPMORGAN CHASE BANK, N.A. BY IMMIGON PORTFOLIOABBAU AG**

This Stipulation is entered into by and between defendant Immigon Portfolioabbau ag (formerly known as Österreichische Volksbanken Aktiengesellschaft) (“Immigon”) and defendant JPMorgan Chase Bank, N.A. (“JPMCB”).

WHEREAS, on March 2, 2017, Immigon filed cross-claims against JPMCB (ECF No. 857) (“Immigon Cross-Claims”).

WHEREAS, on September 7, 2017, the Court so ordered the stipulation between Immigon and JPMCB whereby Immigon dismissed, without prejudice, the Immigon Cross-Claims and Immigon and JPMCB agreed that if Immigon refiled cross-claims on or before

December 31, 2017, the refiled cross-claims would be treated as if such cross-claims were filed on March 2, 2017 (ECF No. 1012).

WHEREAS, on March 29, 2018, the Court so ordered a stipulation whereby Immigon and JPMCB agreed to further extend the deadline for Immigon to refile cross-claims to April 2, 2018, on the terms set forth therein (ECF No. 1049).

WHEREAS, on March 30, 2018, Immigon and JPMCB filed a stipulation further extending the deadline for Immigon to refile cross-claims to December 31, 2018, on the terms set forth therein (ECF No. 1050).

WHEREAS, Immigon and JPMCB wish to further extend the deadline for Immigon to refile cross-claims.

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

1. Immigon and JPMCB expressly reserve and preserve any and all rights and defenses each had with respect to the Immigon Cross-Claims as of March 2, 2017.
2. If Immigon refiles cross-claims on or before October 31, 2019, the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 2, 2017.
3. Immigon and JPMCB may stipulate between and among themselves to further extensions of the deadline for Immigon to refile cross-claims on the same terms set out herein without the need for a court order.

Dated: December 27, 2018

Dated: December 27, 2018

WACHTELL, LIPTON, ROSEN & KATZ

**LEWIS BAACH KAUFMANN
MIDDLEMISS PLLC**

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

By: /s/ Bruce R. Grace

Bruce R. Grace
1899 Pennsylvania Avenue, NW, Ste 600
Washington, DC 20006
Telephone: (202) 833-8900
Email: Bruce.Grace@lbkmlaw.com

and

*Attorney for Defendant and Cross-Claimant
Immigon Portfolioabbau ag*

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

and

JONES DAY

By: /s/ C. Lee Wilson

C. Lee Wilson
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3886
Email: clwilson@jonesday.com

*Attorneys for Defendant and Cross-Claim
Defendant JPMorgan Chase Bank, N.A.*