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March 22, 2019

By Hand, ECF, and Email

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

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

Dear Judge Glenn:

We write on behalf of plaintiff, the Motors Liquidation Company Avoidance Action Trust, with the concurrence of JPMorgan, the Defendants Steering Committee, and the Motors Liquidation Company GUC Trust.

Since we last reported to the Court on March 4, 2019 about the parties' settlement in principle, the parties have continued to work together on the draft settlement agreement to fully resolve both plaintiff's claims and the cross-claims in the above-captioned action. Although the settlement agreement is still in the process of being negotiated and revised, the parties have continued to make progress. When the definitive settlement agreement is finalized, we plan to file a motion seeking the Court's approval of the settlement. We had all hoped to be in a position to finalize the settlement and have an approval motion on file with the Court before today's update to the Court was due. However, there are a limited number of outstanding issues that the parties continue to work through. We propose to provide a further update to the Court or file the settlement approval motion on or before April 3, 2019.

We are available to answer any questions the Court may have.

Respectfully,

/s/ Eric B. Fisher
Eric B. Fisher

cc: Counsel of Record (by ECF and email)