

BINDER &
SCHWARTZ

Eric B. Fisher
Binder & Schwartz LLP
366 Madison Avenue 6th Floor
New York, NY 10017

(T) 212.933.4551
(F) 212.510.7299
efisher@binderschwartz.com

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By Federal Express, 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 (the "AAT"), with the concurrence of JPMorgan Chase Bank, N.A. ("JPMorgan"), the Defendants Steering Committee, and the Motors Liquidation Company GUC Trust (the "GUC Trust") with respect to the above-referenced action.

In our April 12, 2019 update, we advised the Court that the final settlement agreement was in the process of being signed by all necessary parties. As the Court is aware, there are hundreds of term lender defendants named in the action, and the settlement agreement contemplates that almost all of the more than 400 of them represented by counsel on the Defendants Steering Committee will sign the settlement agreement. The settlement agreement has now been signed on behalf of the AAT, JPMorgan, Simpson Thacher & Bartlett LLP and the GUC Trust; and we are advised that signature pages have been obtained from the substantial majority of other required signatories, and that the remainder are in process. We have further been advised that the Defendants Steering Committee is following up to obtain all remaining required signatures. As soon as the signature process is completed, the AAT will be ready to file a motion to seek the Court's approval of the settlement.

We propose to provide a further update to the Court or file the motion seeking approval of the settlement agreement on or before May 10, 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)