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Attorneys for Plaintiff

**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.*,

Debtors.

Chapter 11 Case
Case No. 09-50026 (REG)
(Jointly Administered)

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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,

Plaintiff,

Adversary Proceeding
Case No. 09-00504 (REG)

vs.

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

Defendants.
-----x

**STIPULATION AND ORDER EXTENDING TIME TO
RESPOND TO FIRST AMENDED ADVERSARY COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the time by which **Alticor Inc.** must move, answer or otherwise respond to the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, 2) Avoidance and Recovery of Postpetition Transfer, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Docket No. 91] in the above-captioned adversary proceeding is hereby extended to and including November 30, 2015.

Dated: November 4, 2015

Dated: November 4, 2015

/s/ Evan J. Zucker

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Attorneys for Alticor Inc.

SO ORDERED

Dated: New York, New York
November __, 2015

Honorable Robert E. Gerber
United States Bankruptcy Judge