

Barry N. Seidel  
Eric B. Fisher  
Evan J. Zucker  
DICKSTEIN SHAPIRO LLP  
1633 Broadway  
New York, New York 10019-6708  
Telephone: (212) 277-6500  
Facsimile: (212) 277-6501

Jeffrey Rhodes (*admitted pro hac vice*)  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street, NW  
Washington, D.C. 20006  
Telephone: (202) 420-3150

*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.*,

Chapter 11

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

Debtors.

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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)

against

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

Defendants.

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

WHEREAS, **Employees' Retirement System of the City of Montgomery** (“**Defendant**”), a defendant in the above-captioned adversary proceeding has requested additional time to respond to the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Docket No. 91] (the “**Amended Complaint**”); and

WHEREAS, the Defendant plans to answer the Amended Complaint; it is therefore

STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the time by which Defendant must answer the Amended Complaint is hereby extended to and including November 30, 2015.

Dated: New York, New York  
November 11, 2015

Boston, Massachusetts  
November 11, 2015

**DICKSTEIN SHAPIRO LLP**

**SHAPIRO HABER & URMY LLP**

/s/ Evan J. Zucker

/s/ Edward F. Haber

Barry N. Seidel, Esq.  
Eric B. Fisher, Esq.  
Evan J. Zucker Esq.  
DICKSTEIN SHAPIRO LLP  
1633 Broadway  
New York, New York 10019  
Tel: 212-277-6500  
Fax: 212-277-6501

Edward F. Haber  
Shapiro Haber & Urmy LLP  
Seaport East  
Two Seaport Lane  
Boston, MA 02210  
Phone: (617) 439-3939  
Fax: (617) 439-0134

*Attorneys for Plaintiff*

*Attorneys for Employees' Retirement  
System of the City of Montgomery*

**SO ORDERED**

Dated: New York, New York  
November \_\_\_\_, 2015

\_\_\_\_\_  
United States Bankruptcy Judge