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*Attorneys for the Ad Hoc Group of Term  
Lenders*

*Attorneys for Plaintiff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X
<i>In re:</i>	:
	:
MOTORS LIQUIDATION COMPANY, et al.,	:
	:
Chapter 11	:
	:
Debtors.	:
	:
Case No. 09-50026 (REG)	:
	:
(Jointly Administered)	:
	:
-----	X

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	:
	:
-against-	:
	:
No. 09-00504 (REG)	:
	:
JP MORGAN CHASE BANK, N.A. et al.,	:
	:
Defendants.	:
	:
-----	X

**STIPULATION AND [PROPOSED] 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 the Ad Hoc Group of Term Lenders<sup>1</sup> must move, answer, or otherwise 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] in the above-captioned adversary proceeding is hereby extended to and including November 20, 2015.

Dated: New York, New York  
November 11, 2015

DICKSTEIN SHAPIRO LLP

By: /s/ Evan J. Zucker  
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*Attorneys for the Ad Hoc Group of Term  
Lenders*

**SO ORDERED**

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

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

<sup>1</sup> A full list of the Ad Hoc Group of Term Lenders is set forth on Schedule A hereto.

**SCHEDULE A**

*Blackrock California State Teachers Retirement System*  
*Blackrock Corporate High Yield Fund, Inc.*  
*Blackrock Corporate High Yield Fund III, Inc.*  
*BlackRock Corporate High Yield Fund IV, Inc.*  
*Blackrock Corporate High Yield Fund V, Inc.*  
*Corporate High Yield Fund V, Inc.*  
*Blackrock Corporate High Yield Fund VI, Inc.*  
*Blackrock Debt Strategies Fund, Inc.*  
*Blackrock Diversified Income Strategies Fund, Inc.*  
*BlackRock Diversified Income Strategies Portfolio, Inc.*  
*Blackrock Employees' Retirement Fund of the City of Dallas*  
*Blackrock Floating Rate Income Strategies Fund Inc.*  
*Blackrock Funds High Yield Bond Portfolio*  
*BlackRock High Yield Portfolio of BlackRock Series Fund, Inc.*  
*Blackrock Funds II - High Yield Bond Portfolio*  
*BlackRock Funds II, High Yield Bond Portfolio*  
*Blackrock Global Investment Series: Income Strategies Portfolio*  
*BGIS Income Strategies Portfolio*  
*Blackrock GSAM Goldman Core Plus Fixed Income Fund*  
*Blackrock High Income Fund of Blackrock Bond Fund Inc.*  
*BlackRock High Income Fund*  
*Blackrock High Income Shares*  
*Blackrock-Lockheed Martin Corp Master Retirement Trust*  
*Lockheed Martin High Yield Portfolio*  
*Blackrock High Yield Trust*  
*Blackrock Managed Account Series High Income Portfolio*  
*Managed Account Series: High Income Portfolio*  
*Blackrock Met Investors Series Trust High Yield Portfolio*  
*Blackrock Multi Strategy Sub-Trust C*  
*Blackrock Senior High Income Fund Inc.*  
*Blackrock Senior Income Series II*  
*Blackrock Senior Income Series IV*  
*Blackrock Strategic Bond Trust*  
*R3 Capital Partners Master LP*  
*R3 Capital Partners Master - Cayman Trading Portfolio*  
*The Galaxite Master Unit Trust*  
*Galaxite - Citi Prime Brokerage Account*  
*Fundamental Core PLUS Portfolio*  
*LGT Multi Manager Bond High Yield*  
*NEXCOM High Yield*  
*MIST BlackRock High Yield Portfolio*  
*ULTRA-HY*  
*PNC Pension High Yield Portfolio*  
*Employees Retirement Fund of the City of Dallas*  
*California State Teachers' Retirement System*

*Missouri State Employees Retirement System (MOSERS)*  
*MOSERS Credit Opportunities- Bank Loan Portfolio*  
*Fortress Credit Investments I Ltd.*  
*Fortress Credit Investments II Ltd.*  
*Drawbridge Special Opportunities Fund LP*  
*Drawbridge Special Opportunities Fund Ltd.*  
*Taconic Capital Partners 1 5 LP*  
*Taconic Capital Partners 1.5 LP*  
*Taconic Market Dislocation Fund II LP*  
*Taconic Market Dislocation Master Fund II LP*  
*Taconic Opportunity Fund LP*  
*Solus Core Opportunities Master Fund Ltd.*  
*Solus Core Opportunities Master Fund*  
*Sola Ltd.*  
*Ultra Master Ltd*  
*Mason Capital L.P.*  
*Mason Capital Ltd.*  
*Thrivent Financial for Lutherans*  
*Thrivent High Yield Fund*  
*Thrivent High Yield Portfolio*  
*Thrivent Income Fund*  
*Thrivent Series Fund, Inc. - Income Portfolio*  
*Delaware LVIP Delaware Bond Fund*  
*LVIP Delaware Bond Fund, a series of Lincoln Variable Insurance Products Trust*  
*L3-Lincoln Variable Insurance Products Trust - Managed Fund*  
*LVIP Delaware Foundation® Conservative Allocation Fund, a series of Lincoln Variable*  
*Insurance Products Trust (and the successor to LVIP Delaware Managed Fund)*  
*Lincoln National Life Insurance Company Separate Account 12*  
*The Lincoln National Life Insurance Company Separate Account 12*  
*Lincoln National Life WSA20*  
*The Lincoln National Life Insurance Company Separate Account 20*  
*PIMCO 1464-Freescale Semiconductor Inc*  
*Freescale Semiconductor Inc. , Retirement Savings*  
*Freescale Semiconductor, Inc.*  
*PIMCO 1641-Sierra Pacific Resources*  
*NV Energy, Inc. Master Defined Benefit Trust*  
*PIMCO Fairway Loan Funding Company*  
*Fairway Loan Funding Company - CDO*  
*PIMCO2244 - Virginia Retirement System*  
*Virginia Retirement System*  
*PIMCO2496-FLTG RT INC FD*  
*PIMCO Income Strategy Fund (PFL)*  
*PIMCO2497-FLTG RT STRT FD*  
*PIMCO Income Strategy Fund II (PFN)*  
*PIMCO2603 - Red River HYPI LP*  
*Red River HYPI, L.P.*

*PIMCO3813 - PIMCO Cayman Bank Loan Fund*  
*PIMCO Cayman Bank Loan Fund (USD)*  
*PIMCO400-Stocks Plus Sub Fund B LLC*  
*PIMCO StockPLUS LP Fund B*  
*PIMCO6819 Portola CLO LTD.*  
*PIMCO700-FD TOT RTN FD*  
*PIMCO Total Return Fund*  
*PIMCO706-Private High Yield Portfolio*  
*PAPS High Yield Portfolio*  
*Mayport Clo Ltd.*  
*Mayport CLO, Ltd.*  
*Global Investment Grade Credit Fund*  
*GIS Global Investment Grade Credit Fund*  
*Portola CLO Ltd.*  
*Golden Knight II CLO, Ltd.*  
*Lord Abbett Inv Trst-LA Hi Yld*  
*Lord Abbett Investment Trust - Lord Abbett High Yield Fund*  
*Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund*  
*Lord Abbett & Co - Teachers Re*  
*Lord Abbett managed account for Teachers' Retirement System of Oklahoma*  
*Mackay 8067 - Fire & Police Employee Retirement System of the City of Baltimore*  
*Fire & Police Employees' Retirement System of the City of Baltimore*  
*Putnam 29x-Funds Trust Floating Rate Income Fund*  
*Delaware Delchester Fund*  
*Delaware Delchester Fund, a series of Delaware Group Income Funds*  
*Delaware Diversified Income Fund*  
*Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds*  
*Delaware Diversified Income Trust*  
*Delaware Enhanced Global Dividend & Income Fund*  
*Delaware Extended Duration Bond Fund*  
*Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds*  
*Delaware Group Equity V Inc. Dividend Income Fund,*  
*Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V*  
*Delaware Group Government Fund Core Plus Fund*  
*Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund*  
*Delaware Group Inc. Fund Inc. Corporate Bond Fund*  
*Delaware Corporate Bond Fund, a series of Delaware Group Income Funds*  
*Delaware Group Income Funds - Delaware High Yield Opportunities Fund*  
*Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds*  
*Delaware Investments Dividend & Income Fund Inc.*  
*Delaware Investments Global Dividend & Income Fund*  
*Delaware Investments Global Dividend and Income Fund, Inc.*  
*Delaware Optimum Fixed Income Fund*  
*Optimum Fixed Income Fund, a series of Optimum Fund Trust*  
*Delaware Pooled Trust - Core Plus Fixed Income Portfolio*  
*The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust*

*Delaware Pooled Trust - High Yield Bond Portfolio*  
*The High-Yield Bond Portfolio, a series of Delaware Pooled Trust*  
*Delaware VIP Trust Diversified Income Series*  
*Delaware VIP Diversified Income Series, a series of Delaware VIP Trust*  
*Delaware VIP Trust High Yield Series*  
*Delaware VIP High-Yield Series, a series of Delaware VIP Trust*  
*Mackay New York Life Insurance Company (Guaranteed Products)*  
*New York Life Insurance Company Guaranteed Products,*  
*New York Life Insurance Company (Guaranteed Products)*  
*New York Life Insurance GP - Portable Alpha*  
*Arnhold-Houston Police Officers' Pension System*  
*Mackay-Houston Police Officers Pension System*  
*Plumbers & Pipefitters National Pension Fund*  
*Russell Strategic Bond Fund*  
*Russell Investment Company Russell Strategic Bond Fund*  
*Logan Circle - Russell Inst Funds LLC - Russell Core Bond*  
*Russell Inst Funds LLC Russell Core Bond Fund*  
*Logan Circle - Russell Investment Company PLC*  
*Russell Investment Company PLC The Global Strategic Yield Fund*  
*Russell Investment Company PLC The Global Strategic Yield Fund on behalf of DDJ – Multi-*  
*Style, Multi-Manager Funds PLC – Global Strategic Fund*  
*Logan Circle - Russell Multi-Managed Bond Fund*  
*Russell Trust Company Russell Multi-Managed Bond Fund*  
*Logan Circle - Russell Strategic Bond Fund*  
*Russell Investment Company Russell Strategic Bond Fund*  
*Russell Inst Funds LLC - Russell Core Bond Fund*  
*WAMCO 3073 - John Hancock Trust Floating Rate Income Trust*  
*John Hancock Trust Floating Rate Income Trust*  
*WAMCO 3074 - John Hancock Fund II Floating Rate Income Fund*  
*John Hancock II - Floating Rate Income Fund*  
*Wells Capital Management 16959700*  
*JHVIT U.S. High Yield Bond Trust*  
*Wells Capital Management 16959701*  
*JHF II U.S. High Yield Bond Fund*  
*Lehman Brothers First Trust Income Opportunity Fund*  
*Lehman-Neuberger Berman-High Income Bond Fund*  
*Lehman Brothers High Income Bond Fund*  
*Neuberger Berman High Yield Strategies Fund Inc.*  
*Neuberger Berman High Yield Strategies Fund*  
*Neuberger Berman Income Funds - Neuberger Berman High Income Bond Fund*  
*Neuberger Berman High Income Bond Fund*  
*Neuberger Berman Income Opportunity Fund, Inc.*  
*Guggenheim Portfolio Company X, LLC*  
*Security Investors - Security Income Fund - High Yield Series*  
*Guggenheim High Yield Fund*  
*Security Investors-Security Income Fund-High Yield Series*

*Commonwealth Virginia and the Virginia Retirement System*  
*Virginia Retirement System*  
*WAMCO 3023 - Virginia Retirement Systems Bank Loan Portfolio*  
*WAMCO 176 - Virginia Supplemental Retirement System*  
*Cap Fund, LP*  
*BBT Master Fund, L.P.*  
*BBT Fund, L.P.*  
*SRI Fund, L.P.*  
*Wells Capital Management 16017000*