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Attorneys for Defendant J.P. Morgan Whitefriars Inc.

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

In re:	:	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
Debtors.	:	(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,	:	Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (REG)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for various lenders party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

RULE 7007.1 STATEMENT

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy and to enable Bankruptcy Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for J.P. Morgan Whitefriars Inc. (“Whitefriars”), a private non-governmental party, by its attorneys Kelley Drye & Warren LLP and Wachtell, Lipton, Rosen & Katz, certifies that

Whitefriars is a wholly-owned subsidiary of J.P. Morgan Overseas Capital Corporation, a privately held company, which is a wholly-owned subsidiary of J.P. Morgan International Finance Limited, a privately held company, which is a wholly-owned subsidiary of Bank One International Holdings Corporation, a privately held company, which is a wholly-owned subsidiary of J.P. Morgan International, Inc. , a privately held company, which is a wholly-owned subsidiary of JPMorgan Chase Bank, N.A., a privately held company, which is a wholly-owned subsidiary of JPMorgan Chase & Co., a publicly held corporation, and that no other person or entity owns 10% or more of Whitefriars' stock.

Dated: New York, New York
November 16, 2015

Respectfully submitted,

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

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-and-

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