

**BLANK ROME LLP**

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,  
  
Debtors.

MOTORS LIQUIDATION COMPANY AVOIDANCE  
ACTION TRUST, by and through the Wilmington Trust  
Company, solely in its capacity as Trust Administrator and  
Trustee,

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A., individually and as  
Administrative Agent for various lenders party to the Term  
Loan Agreement described herein, *et al.*,

Defendants.

Chapter 11 Case

Case No. 09-50026 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

**Related Docket No.: 226**

**JOINDER OF PNC BANK, NATIONAL ASSOCIATION IN MOTION TO DISMISS**

PNC Bank, National Association, as successor by merger to National City Bank (“PNC”) joins in the *Certain Term Loan Investor Defendants’ Joint Motion to Dismiss Plaintiff’s Amended Complaint* [ECF No. 226] and accompanying *Memorandum of Law* [ECF No. 226-1], and adopts same as if set forth fully herein.

WHEREFORE, PNC respectfully requests that the Court dismiss this adversary proceeding with prejudice as against PNC and grant such other and further relief to PNC as is just and equitable.

Dated: November 16, 2015

**BLANK ROME LLP**

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-and-

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of November, 2015, a copy of the foregoing Joinder was served via the Court's CM/ECF system on all subscribed parties.

/s/ Stanley Tarr