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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**

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:
In re: :
:
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, : Adversary Proceeding
Plaintiff, :
:
-against- : No. 09-00504 (REG)
:
JP MORGAN 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 the Ad Hoc Group of Term Lenders¹ 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

KASOWITZ, BENSON, TORRES
& FRIEDMAN 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 17, 2015

s/ Robert E. Gerber
United States Bankruptcy Judge

¹ 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