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Attorneys for Defendant Alticor Inc.

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

| | | |
|--|---|------------------------------|
| In re: | : | Chapter 11 |
| | : | |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , | : | Case No.: 09-50026 (REG) |
| | : | |
| Debtors. | : | Jointly Administered |
| | : | |
| MOTORS LIQUIDATION COMPANY | : | |
| AVOIDANCE ACTION TRUST, by and | : | |
| Through the Wilmington Trust Company, solely | : | |
| in its capacity as Trust Administrator and | : | |
| Trustee, | : | |
| | : | Adv. Pro. No. 09-00504 (REG) |
| Plaintiff, | : | |
| | : | |
| -against- | : | |
| | : | |
| JPMORGAN CHASE BANK, N.A., <i>et al.</i> , | : | |
| | : | |
| Defendants. | : | |
| | : | |

JOINDER OF ALTICOR INC. IN MOTIONS TO DISMISS

Defendant Alticor Inc. (“Alticor”), by its undersigned counsel, hereby joins in the following motions to dismiss:

1. *Certain Term Loan Investor Defendants’ Joint Motion to Dismiss Plaintiff’s Amended Complaint* [Dkt. No. 226] and accompanying *Memorandum of Law* [Dkt. No. 226-1]; and

2. *Motion of Ad Hoc Group of Term Lenders (1) to Vacate Certain Prior Orders of the Court; and (2) To Dismiss the Adversary Proceeding* [Dkt. No. 262].

Alticor adopts the arguments set forth in the above pleadings as if the same were set forth fully herein. Alticor’s joinder applies regardless of whether such motions to dismiss are settled, withdrawn or otherwise resolved.

WHEREFORE, Alticor Inc. respectfully requests that the Court dismiss this adversary proceeding with prejudice as against Alticor and grant Alticor such other and further relief as it deems just and proper.

Dated: November 25, 2015

WARNER NORCROSS & JUDD LLP

By: /s/ Gordon J. Toering

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