

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

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| In re: | : | Chapter 11 Case |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , | : | Case No. 09-50026 (REG) |
| | : | (Jointly Administered) |
| Debtors. | : | |
| : | | |
| : | | Adversary Proceeding |
| MOTORS LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee, | : | Case No. 09-00504 (REG) |
| | : | |
| Plaintiff, | : | |
| 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. | : | |

**STIPULATION AND [PROPOSED] ORDER REGARDING EXTENSION
OF THE DEADLINE FOR JPMORGAN CHASE BANK, N.A. TO
ANSWER OR OTHERWISE RESPOND TO CROSS-CLAIMS**

WHEREAS, on November 16, 2015, certain Defendants (the “Cross-Claimants”) filed cross-claims against JPMorgan Chase Bank, N.A. (“JPMCB”) at docket nos. 222 and 241 (the “Cross-Claims”);

WHEREAS Rule 7012(a) of the Federal Rules of Bankruptcy Procedure provides that “[a] party served with a pleading stating a cross-claim shall serve an answer thereto within 21 days after service”;

WHEREAS JPMCB and the Cross-Claimants, as well as other parties in this action, are conferring regarding a schedule for further filings in this action, including in relation to the Cross-Claims;

IT IS HEREBY STIPULATED [AND ORDERED] that the time by which JPMCB must move, answer or otherwise respond to the Cross-Claims is hereby extended to January 20, 2016.

STIPULATED AND AGREED:

Dated: New York, New York By: /s/ Harold S. Novikoff
Dec. 4, 2015

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*Attorneys for Term Loan Lenders listed in Appendix A to
Dkt. No. 241*

SO ORDERED:

UNITED STATES BANKRUPTCY JUDGE