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December 16, 2015

BY HAND AND VIA EMAIL

The Honorable Robert E. Gerber
(gerber.chambers@nysb.uscourts.gov)
United States Bankruptcy Judge
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, New York 10004

Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank, N.A.,*
Adv. Pro. No. 09-00504 (REG)

Dear Judge Gerber:

The undersigned are counsel to over 200 defendants in the above-captioned adversary proceeding. Pursuant to Federal Rule of Bankruptcy Procedure 7007.1, the defendants are required to file corporate ownership statements (the “Statements”).

On November 16, 2015, counsel for several groups of defendants, including certain of the undersigned counsel, sent Your Honor a letter and proposed form of order seeking an extension until December 16, 2015 to file such Statements. Your Honor entered a modified version of that order on November 18, 2015 [Docket No. 259], granting counsel’s request. Since November 16, the undersigned counsel have been working diligently with their clients, endeavoring to collect and analyze the information necessary to comply fully with Rule 7007.1. For many clients, however, such information is not readily accessible. For example, investment funds often do not have direct access to the names of their investors because that information is controlled by a trustee or other intermediary, which itself may not always know if an entity owns 10% or more of the interests in the defendant.

The difficulty of compiling the pertinent information has been compounded by the dozens of clients for which it must be obtained and the logistical challenges presented thereby. While the undersigned counsel have already filed Statements on behalf of some of their clients and expect to be able to file additional Statements on December 16, the undersigned counsel respectfully ask for a brief extension of time to gather the requisite information for other clients.

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Accordingly, the undersigned counsel respectfully request an extension until January 20, 2016, for all defendants to file the remainder of the Statements. Under the latest scheduling order entered by Your Honor, January 20 is the date by which the plaintiff must file any opposition to the *Nonparties' Motion to Quash Process and Service of Process* [Docket No. 239] and the *Motion of Nonparty First Trust Advisors L.P. to Quash Process and Service of Process* [Docket No. 270]. In addition, the parties are currently preparing a stipulation that would further extend this briefing schedule by, for example, making certain motions for judgment on the pleadings due January 20, 2016 and any responses to such motions and the previously filed motions to dismiss due at a later date. The undersigned counsel thus do not expect that Your Honor will be called upon to make any substantive rulings in this case before that date.

Attached for Your Honor's consideration is a proposed form of Order Extending Defendants' Time To File Bankruptcy Rule 7007.1 Statements until January 20, 2016. Also attached to this email for your clerk's convenience is the form of order in MS Word format. Assuming the attached form of order is acceptable, the defendants represented by the undersigned counsel respectfully request that Your Honor enter the proposed order.

Because Rule 7007.1 is designed for the Court's recusal purposes, it is the undersigned counsel's belief that the rule's requirements are procedural in nature and that the rule does not affect any other parties. Accordingly, the attached form of order is being submitted by letter. Counsel for the plaintiff has informed the undersigned counsel that it consents to entry of the attached form of order.

We are available at Your Honor's convenience should Your Honor have any questions regarding the foregoing.

Very truly yours,

JONES DAY

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Enclosure

Cc (with encl.; via email): Eric B. Fisher, Esq., Dickstein Shapiro LLP
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**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)
_____)	
MOTORS LIQUIDATION COMPANY)	
AVOIDANCE ACTION TRUST, by and through)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as)	
Trust Administrator and Trustee,)	Case No. 09-00504 (REG)
Plaintiff,)	
vs.)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	
_____)	

**ORDER EXTENDING DEFENDANTS' TIME TO FILE
BANKRUPTCY RULE 7007.1 STATEMENTS**

After considering the request (the “**Request**”) of certain defendants in the above-captioned action to extend the time by which all defendants in this adversary proceeding (collectively, the “**Defendants**”) must file a disclosure statement under Federal Rule of Bankruptcy Procedure 7007.1 (the “**Statement**”); and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, that the Request is GRANTED; and it is further

ORDERED, that each Defendant who has not already filed its Statement shall have until January 20, 2016 (or such earlier time as the Court may hereafter direct by separate order) to file its Statement; and it is further

ORDERED, that this Order is without prejudice to a Defendant's right to seek further extensions of the time to file its Statement, and the Plaintiff's right to oppose that request or seek an earlier filing; and it is further

ORDERED, that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the entry of this order.

Dated: _____, 2015

HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE