

DAVIS POLK & WARDWELL LLP

Elliot Moskowitz
Marc J. Tobak
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800

Counsel to Bank of America, N.A., Merrill Lynch Capital Services, Inc., Baltic Funding, LLC, and Diamond Springs Trading LLC

**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)
<hr/>		
MOTORS LIQUIDATION COMPANY	:	Adversary Proceeding
AVOIDANCE ACTION TRUST, by and through the	:	Case No. 09-00504 (REG)
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, <i>et al.</i> ,	:	
Defendants.	:	

RULE 7.1 STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Rule 7007.1 of the Federal Rules of Bankruptcy Procedure and S.D.N.Y. Local Bankruptcy Rule 7007.1-1, the undersigned counsel certifies as follows:

- i. Bank of America, N.A. is a wholly-owned indirect subsidiary of Bank of America Corporation. Bank of America, N.A.'s parent company is BANA Holding Corporation, which is owned by BAC North America Holding Company, which is owned by NB Holdings Corporation, which in turn is owned by Bank of America Corporation. Bank of America Corporation is a publicly-held company whose shares are traded on the New York Stock Exchange. It has no parent company and no publicly-held company owns more than 10% of Bank of America Corporation's shares.
- ii. Merrill Lynch Capital Services, Inc., is 100% owned by NB Holdings Corporation. NB Holdings Corporation is 100% owned by Bank of America Corporation. Bank of America Corporation is a publicly-held company whose shares are traded on the New York Stock Exchange. It has no parent company and no publicly-held company owns more than 10% of Bank of America Corporation's shares.
- iii. Baltic Funding LLC is a limited liability company. Its sole member is Pinehurst Trading, Inc., an indirect wholly-owned subsidiary of Bank of America Corporation. Bank of America Corporation is a publicly-held company whose shares are traded on the New York Stock Exchange. It has no parent company and no publicly-held company owns more than 10% of Bank of America Corporation's shares.
- iv. Diamond Springs Trading LLC is a limited liability company. Its sole member is Pinehurst Trading, Inc., an indirect wholly-owned subsidiary of Bank of America Corporation. Bank of America Corporation is a publicly-held company whose

shares are traded on the New York Stock Exchange. It has no parent company
and no publicly-held company owns more than 10% of Bank of America

Corporation's shares.

Dated: December 16, 2015
New York, New York

Respectfully submitted,

/s/ Elliot Moskowitz

Elliot Moskowitz
Marc J. Tobak
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
(212) 450-4000

*Attorneys for Bank of America, N.A., Merrill
Lynch Capital Services, Inc., Baltic Funding LLC,
and Diamond Springs Trading LLC*