

DAVIS POLK & WARDWELL 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)
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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 that to the best of their knowledge, each of Marathon CLO I Ltd., Marathon CLO II Ltd. and Marathon Financing I, B.V. are managed by

Marathon Asset Management, LP. The general partner of Marathon Asset Management, LP is Marathon Asset Management GP, LLC. Marathon Asset Management GP, LLC has no parent company and no publicly traded company owns 10% or more of its equity interests.

Dated: December 16, 2015
New York, New York

Respectfully submitted,

/s/ Elliot Moskowitz

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*Attorneys for Marathon CLO I Ltd., Marathon
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