

BECKER, GLYNN, MUFFLY, CHASSIN & HOSINSKI LLP
299 Park Avenue, 16th Floor
New York, New York 10171
Phone: (212) 888-3033
Fax: (212) 888-0255
Jordan E. Stern
jstern@beckerglynn.com

Attorneys for Wells Cap Mgmt – 13923601

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

In re:	Chapter 11
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	Case No. 09-50026 (MG)
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,	
Plaintiff,	Adv. Pro. No. 09-00504 (MG)
v.	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	
Defendants.	

**MOTION OF WELLS CAP MGMT – 13923601 FOR JUDGMENT ON THE
PLEADINGS AND JOINDER IN ARGUMENTS**

Defendant Wells Cap Mgmt – 13923601 (“Wells Cap”), by its counsel, Becker, Glynn, Muffly, Chassin & Hosinski LLP, hereby moves for judgment on the pleadings pursuant to the stipulation and order of this Court entered January 4, 2016, and Fed. R. Civ. P. 12(c), made applicable to this adversary proceeding by Fed. R. Bankr. P. 7012(b), and hereby joins in the arguments made in the following motions to dismiss:

1. *Point II*, Certain Term Loan Investor Defendants' Joint Motion to Dismiss Plaintiff's Amended Complaint (ECF No. 226), as set forth in the Memorandum of Law in Support of Certain Term Loan Investor Defendants' Joint Motion To Dismiss Plaintiff's Amended Complaint (ECF No. 226-1);
2. *Point I*, Motion of Ad Hoc Group of Term Lenders (1) To Vacate Certain Prior Orders of the Court; and (2) To Dismiss the Adversary Proceeding (ECF No. 262); and
3. *Point I*, Motion of Term Loan Lenders for Judgment on the Pleadings (ECF No. 377).

Wells Cap adopts and incorporates by reference the arguments with respect to service-extension issues set forth in the above motions, as if set forth fully herein.

WHEREFORE, Wells Cap respectfully requests that the Court grant judgment on the pleadings in its favor, dismiss the adversary proceeding as against Wells Cap with prejudice, and grant such other and further relief as may be just and proper.

Dated: January 27, 2016
New York, New York

Respectfully submitted,

BECKER, GLYNN, MUFFLY,
CHASSIN & HOSINSKI LLP

By: /s/ Jordan E. Stern

Jordan E. Stern
299 Park Avenue, 16th Floor
New York, New York 10171
Phone: (212) 888-3033
Fax: (212) 888-0255
jstern@beckerglynn.com

*Attorneys for Wells Cap Mgmt –
13923601*

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2016, in accordance with applicable law, a copy of the foregoing Motion of Wells Cap Mgmt – 13923601 for Judgment on the Pleadings and Joinder in Arguments was filed electronically. Notice of this filing was sent by email to all parties by operation of the Court’s electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court’s CM/ECF System.

/s/ Jordan E. Stern

Jordan E. Stern