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Hearing Date and Time: TBD

Objection Deadline: March 4, 2016

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Attorneys for Defendant Alticor Inc.

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

In re: :
: :
MOTORS LIQUIDATION COMPANY, *et al.*, :
: :
Debtors. :
:

Chapter 11
Case No.: 09-50026 (REG)
Jointly Administered

MOTORS LIQUIDATION COMPANY :
AVOIDANCE ACTION TRUST, by and :
through the Wilmington Trust Company, solely :
in its capacity as Trust Administrator and :
Trustee, :
:

Adv. Pro. No. 09-00504 (REG)

Plaintiff, :
:

-against- :
:

JPMORGAN CHASE BANK, N.A., *et al.*, :
: :
Defendants. :
:

**NOTICE OF HEARING ON MOTION AND JOINDER OF ALTICOR INC. FOR AN
ORDER PURSUANT TO RULE 12(C) OF THE FEDERAL RULES OF CIVIL
PROCEDURE MADE APPLICABLE TO THIS ADVERSARY PROCEEDING BY
RULE 7012(C) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
ENTERING JUDGMENT IN FAVOR OF ALTICOR INC. AND DISMISSING
THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that a hearing to consider the relief requested in the Motion and Joinder of Alticor Inc. for an Order Pursuant to Rule 12(c) of the Federal Rules of Civil Procedure Made Applicable to this Adversary Proceeding by Rule 7012(c) of the Federal Rules of Bankruptcy Procedure Entering Judgment in Favor of Alticor and Dismissing the Amended Complaint (“Motion and Joinder”), filed by Alticor Inc. (“Alticor”) on January 27, 2016, shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 501, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), **on a date to be determined by the Bankruptcy Court.**

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Motion and Joinder must be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest on a CD-ROM in text-searchable portable document format (PDF), with a hard copy delivered directly to Chambers, in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on the Alticor’s attorneys, Warner Norcross & Judd LLP, 900 Fifth Third Center, 111 Lyon Street, NW, Grand Rapids, MI 49503-2487 (Attn: Gordon J. Toering) and Stark & Stark, P.C. (Attn: Joseph H. Lemkin), P.O. Box 5315, Princeton,

NJ 08543-5315, so as to be received no later than **March 4, 2016** (the “Objection Deadline”), as outlined in the Stipulated Scheduling Order (Dkt. No. 341).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion and Joinder, Alticor may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order submitted with the Motion and Joinder, which order may be signed and entered with no further notice or opportunity to be heard.

Dated: January 27, 2016

/s/ Gordon J. Toering
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Attorneys for Defendant Alticor Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on January 27, 2016 a copy of the foregoing *Notice of Hearing on Motion and Joinder of Alticor Inc. for an Order Pursuant to Rule 12(c) of the*

Federal Rules of Civil Procedure Made Applicable to this Adversary Proceeding by Rule 7012(c) of the Federal Rules of Bankruptcy Procedure Entering Judgment in Favor of Alticor and Dismissing the Amended Complaint was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to registered users in the case and was served via United States Post Office First Class Mail upon the following counsel at the addresses set forth below:

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