

Hearing Date: TBD  
Objection Deadline: March 4, 2016  
Reply Deadline: March 30, 2016

**DAVIS POLK & WARDWELL LLP**

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*Attorneys for Moving Term Loan Lenders as listed on the signature page*

**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 (MG)
Debtors.	:	(Jointly Administered)
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MOTORS LIQUIDATION COMPANY	:	Adversary Proceeding
AVOIDANCE ACTION TRUST, by and through the	:	
Wilmington Trust Company, solely in its capacity as	:	Case No. 09-00504 (MG)
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.	:	

**NOTICE OF HEARING ON THE MOVING TERM LOAN LENDERS' MOTION  
FOR JUDGMENT ON THE PLEADINGS**

PLEASE TAKE NOTICE that a hearing to consider the relief requested in the Moving Term Loan Lenders' Motion for Judgment on the Pleadings<sup>1</sup> (the "**Motion**"), shall be held before the Honorable United States Bankruptcy Judge Martin Glenn, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 501, One Bowling Green, New York, New York (10004) (the "**Court**") on a date and time to be determined by the Court.

PLEASE TAKE NOTICE that objections, if any, to the Motion and the relief requested therein shall be made in writing, shall state with particularity the grounds therefor, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Court's case 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 Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 on Davis Polk & Wardwell LLP, attorneys for the Moving Term Loan Defendants, 450 Lexington Avenue, New York, New York 10017 (Attn: Elliot Moskowitz), so as to be received no later than March 4, 2016.

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<sup>1</sup> The Moving Term Loan Lenders are listed in the signature block on Page 3. Nonparty Global Fund Trust Company, solely in its capacity as the former trustee of MacKay Short Duration Alpha Fund, has previously moved to dismiss the above-captioned case against MacKay Short Duration Alpha Fund on the ground that MacKay Short Duration Alpha Fund lacks capacity to be sued. That motion has not yet been fully briefed. To preserve its rights in the event that the Court denies that motion to dismiss and rules that MacKay Short Duration Alpha Fund may be sued, MacKay Short Duration Alpha Fund joins this motion for judgment on the pleadings.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Motion may be granted without a hearing if no objection is timely filed and served as set forth above.

Dated: New York, New York  
January 27, 2016

Respectfully submitted,

By: /s/ Elliot Moskowitz  
Elliot Moskowitz  
Marc J. Tobak

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*Attorneys for Arrowgrass Master Fund Ltd.; Bank of America, N.A.; Merrill Lynch Capital Services, Inc.; Baltic Funding LLC; Diamond Springs Trading LLC; Barclays Bank PLC; Grand Central Asset Trust, WAM Series; Grand Central Asset Trust, SIL Series; Citibank, N.A.; Citigroup Financial Products Inc.; Loan Funding XI LLC; Bismarck CBNA Loan Funding LLC; Deutsche Bank AG; Deutsche Bank AG Cayman Island Branch; TRS SVCO LLC; Goldman Sachs – ABS Loans 2007 LTD; Goldman Sachs Lending Partners LLC; Marathon CLO I Ltd.; Marathon CLO II Ltd.; Marathon Financing I, B.V.; Morgan Stanley Senior Funding Inc.; The Royal Bank of Scotland PLC; Carbonado LLC; and MacKay Short Duration Alpha Fund*