

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

In re: : Chapter 11
: :
MOTORS LIQUIDATION COMPANY, *et al.*, :
: Case No. 09-50026 (MG)
: (Jointly Administered)
Debtor. :
MOTORS LIQUIDATION COMPANY :
AVOIDANCE ACTION TRUST, by and :
through the Wilmington Trust Company, solely : Adv. Pro. No. 09-00504 (MG)
in its capacity as Trust Administrator and :
Trustee, :
Plaintiff, :
-against- :
JPMORGAN CHASE BANK, N.A., :
individually and as Administrative Agent for :
various lenders party to the Term Loan :
Agreement described herein, *et al.*, :
Defendants. :

**STIPULATION AND [PROPOSED] ORDER FURTHER EXTENDING TIME
TO FILE CORPORATE DISCLOSURE STATEMENTS
PURSUANT TO FED. R. BANKR. P. 7007.1 AND LBR 7007.1-1**

It is hereby stipulated and agreed, by and between the undersigned parties, that the time for Defendants, Highland Credit Opportunities CDO, Ltd. (“HCDO”) and Highland Floating Rate Fund (“HFRF”, and together with HCDO, collectively, “Defendants”), to file their respective corporate disclosure statements pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 7007.1-1, is hereby further extended to and including February 17, 2016.

February 3, 2016

Respectfully submitted,

COLE SCHOTZ P.C.

By: /s/ Jill B. Bienstock

Jill B. Bienstock
1325 Avenue of the Americas
19th Floor
New York, New York 10019
(212) 752-8000 Telephone
(212) 752-8393 Facsimile
jbienstock@coleschotz.com

-and-

Michael D. Warner
301 Commerce Street, Suite 1700
Fort Worth, Texas 76102
(817) 810-5250 Telephone
(817) 810-5255 Facsimile
mwarner@coleschotz.com

-and-

Gary H. Leibowitz
300 E. Lombard Street
Suite 1450
Baltimore, Maryland 21202
(410) 230-0660 Telephone
(410) 230-0667 Facsimile
gleibowitz@coleschotz.com

*Attorneys for Highland Credit Opportunities
CDO, Ltd. and Highland Floating Rate Fund*

BINDER SCHWARTZ LLP

By: /s/ Eric B Fisher

Eric B. Fisher
efisher@binderschwartz.com
Lindsay A. Bush
lbush@binderschwartz.com
28 W. 44th Street, Suite 700
New York, New York 10036
(212) 510-7008 Telephone

Attorneys for Plaintiff