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February 18, 2016

VIA EMAIL AND HAND

The Honorable Martin Glenn
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Motors Liquidation Company Avoidance Action
Trust v. JPMorgan Chase Bank, N.A., et al., Adv.
Pro. No. 09-00504 (MG)

Dear Judge Glenn:

Jones Day and Munger, Tolles & Olson LLP are co-counsel to well over 100 defendants representing approximately \$600 million of the principal of the Term Loan outstanding on June 30, 2009 (collectively, the “Term Loan Lenders”). John Spiegel of Munger Tolles and I are co-lead counsel on this case for our respective firms. I am writing in response to today’s letter from Marc Wolinsky seeking an adjournment of the case management conference from March 3, 2016, to one of six dates—March 22, 23, 24, 29, 30, or 31. *See* ECF No. 416.

The Term Loan Lenders have no objection to the adjournment of the case management conference. However, due to obligations with respect to other cases, Mr. Spiegel and I are available only on the first two of the dates suggested by Mr. Wolinsky—March 22 or 23. Should the Court have the flexibility to do so, I respectfully request that it schedule the case management conference for one of those dates.

Very truly yours,

/s/ Bruce S. Bennett

Bruce S. Bennett

cc: Counsel of Record (by email)