

**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)      |
| Debtor.                                      | : | (Jointly Administered)      |
| <hr/>  |   |                             |
| MOTORS LIQUIDATION COMPANY                   | : |                             |
| AVOIDANCE ACTION TRUST, by and               | : |                             |
| through the Wilmington Trust Company, solely | : |                             |
| in its capacity as Trust Administrator and   | : | Adv. Pro. No. 09-00504 (MG) |
| Trustee,                                     | : |                             |
|  | : |                             |
| Plaintiff,                                   | : |                             |
|  | : |                             |
| -against-                                    | : |                             |
|  | : |                             |
| 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.                                  | : |                             |
| <hr/>  |   |                             |

**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 March 23, 2016.

March 2, 2016

Respectfully submitted,

**COLE SCHOTZ P.C.**

By: /s/ Jill B. Bienstock

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CDO, Ltd. and Highland Floating Rate Fund*

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