

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

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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

Adversary Proceeding

Plaintiff,

Case No. 09-00504 (MG)

against

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

Defendants.

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APPLICATION FOR CERTIFICATE OF DEFAULT

**TO: VITO GENNA, CLERK OF COURT
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

Please enter the default of Defendants in **Exhibit A**, pursuant to Rule 55 of the Federal Rules of Civil Procedure, made applicable hereto by Rule 7055 of the Federal Rules of Bankruptcy Procedure, and pursuant to Local Bankruptcy Rule 7055-1, for failure to plead or otherwise defend the above-captioned action, as fully appears from the court file herein and from the Declaration of Eric B. Fisher, Esq., dated April 20, 2016 and filed simultaneously herewith.

Dated: New York, New York
April 20, 2016

BINDER & SCHWARTZ LLP

/s/ Eric Fisher

Eric B. Fisher

Neil S. Binder

Lindsay A. Bush

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*Attorneys for the Motors Liquidation
Company Avoidance Action Trust*

EXHIBIT A

GMAM Investment Funds Trust
Classic Cayman B D Ltd.
Lehman Principal Investors Fund, Inc. - High Yield Fund
Genesis CLO 2007-2 Ltd.
APG Fixed Income Credits Pool
Foothill CLO I, Ltd.
SFR Ltd.
OW Funding Ltd.
Primus CLO I Ltd.
Avenue CLO V, Ltd.
Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust
RBC Dexia Investor Services Trust as Trustee for GM Canada Foreign Trust
Illinois Municipal Retirement Fund
Genesis CLO 2007-1 Ltd.
Muzinich & Company Ireland Ltd. for the Account of Extra Yield S Loan Fund
Stichting Depository APG Fixed Income Credits Pool
Raytheon MPT-Logan Floating Rate Portfolio
WAMCO – 3131 – Raytheon Master Pension Master Trust
Gracie Credit Opportunities Master Fund LP
Silverado CLO 2006-1 Ltd.
Four Corners CLO III Ltd.
Four Corners CLO II Ltd.
Gulf Stream – Sextant CLO 2007-1 Ltd.
Reams – Laboratory Corp. of America Holdings
MacKay 1028-Arkansas Public Employee Retirement System
Senior Income Trust
Reichhold
Primus CLO II Ltd.
Gulf Stream Compass CLO 2003-1 Ltd.
Gulf Stream – Compass CLO 2007 Ltd.
Reams – Parkview Memorial Health
OCM-WM Pool High Yield Fixed Interest Trust
Reams – Reichhold, Inc.
Oaktree - Employees Retirement Fund of the City of Dallas
Jasper Funding
High Yield Variable Account
Lehman GMAM Investment Funds Trust
Meritage Fund Ltd.
Spiret IV Loan Trust 2003 B
Raytheon MPT-Logan Mid Grade Portfolio
Logan Circle – Sunoco Inc. Master Retirement Trust
Double Black Diamond Offshore Ltd.