

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

In re: MOTOR LIQUIDATION COMPANY, <i>et al.</i> , Debtors.	Chapter 11 Case No. 09-50026 (MG) (Jointly Administered)
MOTOR LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee, Plaintiff, vs. JP MORGAN CHASE BANK, N.A., <i>et al.</i> Defendants.	Adversary Proceeding Case No. 09-00504 (MG)

**STIPULATION AND ORDER EXTENDING TIME TO
RESPOND TO FIRST AMENDED ADVERSARY COMPLAINT**

It is hereby stipulated and agreed, by and between the undersigned parties, that the time by which defendant Foothill CLO I, Ltd. must answer the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Adv. Proc. Docket No. 91] in the above-captioned adversary proceeding is hereby extended to and including May 18, 2016.

Dated: New York, New York
May 4, 2016

Respectfully submitted,

HAHN & HESSEN LLP

By: /s/ Mark T. Power
Mark T. Power
(mpower@hahnessen.com)
Alison M. Ladd
(aladd@hahnessen.com)
488 Madison Avenue
New York, NY 10022
Telephone: (212) 478-7200
Facsimile: (212) 478-7400

*Attorneys for Defendant Foothill CLO I, Ltd. and the
Defendants Listed on Appendix A hereto*

BINDER SCHWARTZ LLP

By: /s/ Michael M. Hodgson
Eric B. Fisher
(efisher@binderschwartz.com)
Michael M. Hodgson
(mhodgson@binderschwartz.com)

366 Madison Avenue, 6th Floor
New York, NY 10017
Tel: (212) 510-7008

Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: May 9, 2016
New York, New York

/s/ Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge

Appendix A¹

Arch Reinsurance Ltd.
Bechtel Trust & Thrift Plan & Master Trust for Certain Tax Qualified Bechtel Retirement Plans
Bill & Melinda Gates Foundation Trust
Board of Fire and Police Pension Commissioners of the City of Los Angeles
Board of Pensions of the Presbyterian Church (U.S.A.)
Building Trades United Pension Trust Fund
Carpenters Pension Fund of Illinois
Caterpillar Master Retirement Trust
City of Milwaukee Employees' Retirement System
Coca-Cola Company Retirement & Master Trust
Columbus Unconstrained Bond Fund (formerly Reams Unconstrained Bond Fund)
Connecticut General Life Insurance Company In Respect of Its Separate Account 4828CP
Cummins Inc. and Affiliates Collective Investment Trust
DDJ High Yield Fund
Debello Investors LLC
Eighth District Electrical Pension Fund
Emerson Electric Co. Retirement Master Trust
Employees' Retirement System of Baltimore County
GoldenTree Loan Opportunities III, Ltd.
GoldenTree Loan Opportunities IV, Ltd.
Halliburton Company Employee Benefit Master Trust
Health Care Foundation of Greater Kansas City
ILWU/PMA Pension Plan Trust
Indiana Public Retirement System
Indiana State Police Pension Trust
Indiana University
Inter-Local Pension Fund of the Graphic Communications Conference of the International Brotherhood of Teamsters
J.C. Penney Corporation, Inc. Pension Plan Trust
Kraft Heinz Foods Company & Kraft Foods Master Retirement Trust
Kynikos Opportunity Fund II, L.P.
Kynikos Opportunity Fund International Limited

¹ Hahn & Hessen LLP (“H&H”) has also appeared on behalf of Nonparties Oak Hill Credit Partners II Ltd., Oak Hill Credit Partners III Ltd. and Oak Hill Credit Partners IV Ltd., which entities have been dissolved. To the extent these entities are determined not to be dissolved or otherwise remain party to this adversary proceeding, H&H has also appeared on their behalf and such entities have joined in the pending *Certain Term Loan Investor Defendants’ Joint Motion to Dismiss Plaintiff’s Amended Complaint* [D.I. 226].

Kynikos Opportunity Fund, L.P.
Master Trust Pursuant to the Retirement Plans of APL Limited & Subsidiaries
Mather Foundation
Montana Board of Investments
Municipal Employees' Retirement System of Michigan
New Orleans Carpenters Pension Plan <i>f/k/a Louisiana Carpenters Regional Council Pension Plan</i>
Purdue University
Reams – Prudential Retirement Insurance & Annuity Company, on behalf of Separate Account SA-18
Retirement Board of the Park Employees' and Retirement Board Employees' Annuity and Benefit Fund of Chicago
Santa Barbara County Employees' Retirement System
Scout Core Plus Bond Fund (formerly Frontegra Columbus Core Plus Bond Fund)
Seattle City Employees' Retirement System
Shinnecock CLO II, Ltd.
Sonoma County Employees' Retirement Association
State of Indiana Major Moves Construction Fund
Stichting Bewaarder Syntrus Achmea Global High Yield Pool <i>f/k/a Stichting Bewaarder Interpolis Pensioenen Global High Yield Pool</i>
Stichting Pensioenfonds Hoogovens
Stichting Pensioenfonds Metaal en Techniek
St. Luke's Health System Corporation, as successor to St. Luke's Episcopal Health System Foundation
Taxable Fixed Income Managers: Portfolio 1 [Series] <i>f/k/a Goldman Sachs GMS Core Plus Fixed Income Portfolio</i>
The Children's Hospital of Philadelphia Foundation
The Duchossois Group Inc. Pension Trust
The Rotary Foundation
Twin Lake Total Return Partners LP <i>f/k/a Talon Total Return Partners LP</i>
Twin Lake Total Return Partners QP LP <i>f/k/a Talon Total Return QP Partners LP</i>
University of Kentucky
Ventura County Employees' Retirement Association
Vulcan Ventures, Inc.
Wexford Catalyst Investors LLC
Wexford Spectrum Investors LLC
Oak Hill Credit Opportunities Financing Ltd.
Oak Hill Credit Opportunities Master Fund, Ltd.
Oak Hill Credit Partners V Ltd.
OHA Capital Solution Financing (Offshore), Ltd.

OHA Capital Solution Financing (Onshore), Ltd.
OHA Park Avenue CLO I Ltd.
OHSF Financing Ltd.
OHSF II Financing Ltd.
Stichting Pensioenfonds van de Metalektro <i>f/k/a Stichting Bedrijfstakpensioenfonds Voor De Metalektro</i>
Stichting Pensionfonds Me
Foothill CLO I, Ltd.