

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

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*In re:* :  
 MOTORS LIQUIDATION COMPANY, et al., : Chapter 11  
 Debtors : Case No. 09-50026 (MG)  
 : (Jointly Administered)  
 :

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 MOTORS LIQUIDATION COMPANY AVOIDANCE :  
 ACTION TRUST, by and through the Wilmington :  
 Trust Company, solely in its capacity as Trust : Adversary Proceeding  
 Administrator and Trustee, : No. 09-00504 (MG)  
 Plaintiff, :  
 -against- :  
 JPMORGAN CHASE BANK, N.A. *et al.*, :  
 Defendants. :

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**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 SF-3 Segregated Portfolio 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 12, 2016

Respectfully submitted,

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

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*Attorneys for SF-3 Segregated Portfolio*  
*[\*complete list of represented Defendants listed in*  
*Appendix A]*

BINDER SCHWARTZ LLP

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*Attorneys for Plaintiff*

**IT IS SO ORDERED:**

By: \_\_\_\_\_  
**MARTIN GLENN**  
**UNITED STATES BANKRUPTCY JUDGE**

**APPENDIX A**

*BlackRock Corporate High Yield Fund, Inc.*  
*BlackRock Corporate High Yield Fund III, Inc.*  
*BlackRock Corporate High Yield Fund V, Inc.,*  
*BlackRock Corporate High Yield Fund VI, Inc.*  
*BlackRock Debt Strategies Fund, Inc.*  
*BlackRock Diversified Income Strategies Fund, Inc.*  
*BlackRock Floating Rate Income Strategies Fund Inc.*  
*BlackRock Funds High Yield Bond Portfolio*  
*BlackRock Funds II, High Yield Bond Portfolio*  
*BlackRock Global Investment Series: Income Strategies Portfolio*  
*BlackRock GSAM Goldman Core Plus Fixed Income Fund*  
*BlackRock High Incm Fund of BlackRock Bond Fund Inc.*  
*BlackRock High Income Shares*  
*BlackRock High Yield Trust*  
*BlackRock Managed Account Series High Income Portfolio*  
*BlackRock MET Investor Series TR High Yield Portfolio*  
*BlackRock Multi Strategy Sub-Trust C*  
*BlackRock Senior High Income Fund, Inc.*  
*BlackRock Senior Income Series II*  
*BlackRock Senior Income Series IV*  
*BlackRock Strategic Bond Trust*  
*R3 Capital Partners Master LP*  
*The Galaxite Master Unit Trust*  
*BlackRock Corporate High Yield Fund IV, Inc.*  
*Corporate High Yield Fund V, Inc.*  
*BlackRock Diversified Income Strategies Portfolio, Inc.*  
*BlackRock High Yield Portfolio of BlackRock Series Fund, Inc.*  
*BlackRock Funds II, High Yield Bond Portfolio*  
*BGIS Income Strategies Portfolio*  
*BlackRock High Income Fund*  
*Managed Account Series: High Income Portfolio*  
*R3 Capital Partners Master - Cayman Trading Portfolio*  
*Galaxite - Citi Prime Brokerage Account*  
*BlackRock Multi-Strategy Fixed Income*  
*BlackRock Senior Income Fund Inc.*  
*Fixed Income Portable Alpha Fund – Credit*  
*California State Teachers' Retirement System*  
*Missouri State Employees Retirement System*  
*Fortress Credit Investments I Ltd.*  
*Fortress Credit Investments II Ltd.*  
*Drawbridge Special Opportunities Fund LP*  
*Drawbridge Special Opportunities Fund Ltd.*  
*Taconic Capital Partners 1 5 LP*  
*Taconic Capital Partners 1.5 LP*  
*Taconic Market Dislocation Fund II LP*

*Taconic Market Dislocation Master Fund II LP*  
*Taconic Opportunity Fund LP*  
*Solus Core Opportunities Master Fund Ltd.*  
*Sola Ltd.*  
*Ultra Master Ltd*  
*Mason Capital, L.P.*  
*Mason Capital, Ltd.*  
*Thrivent Financial for Lutherans*  
*Thrivent High Yield Fund*  
*Thrivent High Yield Portfolio*  
*Thrivent Income Fund*  
*Thrivent Series Fund, Inc. - Income Portfolio*  
*Delaware LVIP Delaware Bond Fund*  
*L3-Lincoln Variable Insurance Products Trust Managed Fund*  
*Lincoln National Life Insurance Company Separate Account 12*  
*Lincoln National Life WSA20*  
*LVIP Delaware Bond Fund, a series of Lincoln Variable Insurance Products Trust*  
*LVIP Delaware Foundation® Conservative Allocation Fund, a series of Lincoln Variable*  
*Insurance Products Trust*  
*The Lincoln National Life Insurance Company Separate Account 12*  
*The Lincoln National Life Insurance Company Separate Account 20*  
*Freescale Semiconductor, Inc.*  
*Freescale Semiconductor Inc., Retirement Savings*  
*PIMCO 1464-Freescale Semiconductor Inc*  
*PIMCO 1641-Sierra Pacific Resources*  
*PIMCO Fairway Loan Funding Company*  
*PIMCO2244 - Virginia Retirement System*  
*PIMCO2496-FLTG RT INC FD*  
*PIMCO2497-FLTG RT STRT FD*  
*PIMCO2603 - Red River HYPI LP*  
*PIMCO3813 - PIMCO Cayman Bank Loan Fund*  
*PIMCO400-Stocks Plus Sub Fund B LLC*  
*PIMCO6819 Portola CLO LTD.*  
*PIMCO700-FD TOT RTN FD*  
*PIMCO706-Private High Yield Portfolio*  
*Mayport CLO Ltd.*  
*Global Investment Grade Credit Fund*  
*Portola CLO Ltd.*  
*Golden Knight II CLO, Ltd.*  
*NV Energy, Inc. Master Defined Benefit Trust*  
*Fairway Loan Funding Company – CDO*  
*Virginia Retirement System*  
*PIMCO Income Strategy Fund (PFL)*  
*PIMCO Income Strategy Fund II (PFN)*  
*Red River HYPI, L.P.*  
*PIMCO Cayman Bank Loan Fund (USD)*

*PIMCO StockPLUS LP Fund B*  
*Portola CLO, Ltd.*  
*PIMCO Total Return Fund*  
*PAPS High Yield Portfolio*  
*Mayport CLO, Ltd.*  
*GIS Global Investment Grade Credit Fund*  
*Lord Abbett Inv Trst-LA HI YLD*  
*Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund*  
*Lord Abbett & Co - Teachers Re*  
*Lord Abbett Investment Trust - Lord Abbett High Yield Fund*  
*Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund*  
*Lord Abbett managed account for Teachers' Retirement System of Oklahoma*  
*MacKay 8067 - Fire & Police Employee Retirement System of the City of Baltimore*  
*Fire & Police Employees' Retirement System of the City of Baltimore*  
*Putnam 29x-Funds Trust Floating Rate Income Fund*  
*Delaware Delchester Fund*  
*Delaware Diversified Income Fund*  
*Delaware Diversified Income Trust*  
*Delaware Enhanced Global Dividend & Income Fund*  
*Delaware Extended Duration Bond Fund*  
*Delaware Group Equity V Inc. Dividend Income Fund*  
*Delaware Group Government Fund Core Plus Fund*  
*Delaware Group Inc. Fund Inc. Corporate Bond Fund*  
*Delaware Group Income Funds - Delaware High Yield Opportunities Fund*  
*Delaware Investments Dividend & Income Fund Inc.*  
*Delaware Investments Global Dividend & Income Fund*  
*Delaware Optimum Fixed Income Fund*  
*Delaware Pooled Trust - Core Plus Fixed Income Portfolio*  
*Delaware Pooled Trust - High Yield Bond Portfolio*  
*Delaware VIP Trust Diversified Income Series*  
*Delaware VIP Trust High Yield Series*  
*Delaware Delchester Fund, a series of Delaware Group Income Funds*  
*Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds*  
*Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds*  
*Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V*  
*Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund*  
*Delaware Corporate Bond Fund, a series of Delaware Group Income Funds*  
*Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds*  
*Delaware Investments Global Dividend and Income Fund, Inc.*  
*Optimum Fixed Income Fund, a series of Optimum Fund Trust*  
*The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust*  
*The High-Yield Bond Portfolio, a series of Delaware Pooled Trust*  
*Delaware VIP Diversified Income Series, a series of Delaware VIP Trust*  
*Delaware VIP High-Yield Series, a series of Delaware VIP Trust*  
*MacKay New York Life Insurance Company (Guaranteed Products)*  
*New York Life Insurance Company Guaranteed Products*

*New York Life Insurance Company (Guaranteed Products)*  
*New York Life Insurance GP - Portable Alpha*  
*MacKay Shields Core Plus Alpha Fund Ltd.*  
*Arnhold-Houston Police Officers' Pension System*  
*MacKay-Houston Police Officers Pension System*  
*Plumbers & Pipefitters National Pension Fund*  
*Russell Strategic Bond Fund*  
*Logan Circle - Russell Inst Funds LLC - Russell Core Bond*  
*Logan Circle - Russell Investment Company PLC*  
*Logan Circle - Russell Multi-Managed Bond Fund*  
*Logan Circle - Russell Strategic Bond Fund*  
*Russell Investment Company Russell Strategic Bond Fund*  
*Russell Inst Funds LLC Russell Core Bond Fund*  
*Russell Investment Company PLC The Global Strategic Yield Fund*  
*Russell Investment Company PLC The Global Strategic Yield Fund on behalf of DDJ – Multi-Style, Multi-Manager Funds PLC – Global Strategic Fund*  
*Russell Trust Company Russell Multi-Managed Bond Fund*  
*Russell Investment Company Russell Strategic Bond Fund*  
*Russell Inst Funds LLC - Russell Core Bond Fund*  
*WAMCO 3073 - John Hancock Trust Floating Rate Income Trust,*  
*WAMCO 3074 - John Hancock Fund II Floating Rate Income Fund*  
*John Hancock Trust Floating Rate Income Trust*  
*John Hancock II - Floating Rate Income Fund*  
*John Hancock Variable Insurance Trust - Floating Rate Income Trust*  
*John Hancock Funds II - Floating Rate Income Fund*  
*John Hancock Variable Insurance Trust - High Yield Bond Trust (f/k/a John Hancock Variable Insurance Trust - U.S. High Yield Bond Trust)*  
*John Hancock Funds II - U.S. High Yield Bond Fund*  
*Wells Capital Management 16959700*  
*JHVIT U.S. High Yield Bond Trust*  
*Wells Capital Management 16959701*  
*JHF II U.S. High Yield Bond Fund*  
*Neuberger Berman High Yield Strategies Fund Inc. (f/k/a Lehman Brothers First Trust Income Opportunity Fund)*  
*Neuberger Berman High Income Bond Fund (f/k/a Lehman Brothers High Income Bond Fund)*  
*Guggenheim Portfolio Company X, LLC*  
*Guggenheim Portfolio Co X LCC*  
*Security Investors - Security Income Fund - High Yield Series*  
*Guggenheim High Yield Fund*  
*Commonwealth Virginia and the Virginia Retirement System*  
*WAMCO 3023 - Virginia Retirement Systems Bank Loan Portfolio*  
*WAMCO 176 - Virginia Supplemental Retirement System*  
*Cap Fund, L.P.*  
*BBT Master Fund, L.P.*  
*BBT Fund, L.P.*  
*SRI Fund, L.P.*

*Wells Capital Management 16017000*  
*North Dakota State Investment Board*  
*Four Corners CLO III Ltd.*  
*Four Corners CLO II Ltd.*  
*Genesis CLO 2007-1 Ltd.*  
*SF-3 Segregated Portfolio*