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

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In re:

Chapter 11

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

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,

Plaintiff,

against

Adversary Proceeding  
Case No. 09-00504 (MG)

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

Defendants.

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**STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO ANSWER AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the  
undersigned parties, that the time by which **Continental Casualty Company** 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 [Docket No. 91]*  
in the above-captioned adversary proceeding is hereby extended to and including  
July 27, 2016.

Dated: New York, New York  
July 8, 2016

Chicago, IL  
July 8, 2016

**BINDER & SCHWARTZ LLP**

**ELENIUS, FROST & WALSH**

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*Attorneys for Plaintiff Motors Liquidation  
Company Avoidance Action Trust*

*Attorneys for Defendant Continental Casualty  
Company*

**SO ORDERED**

Dated: New York, New York  
July \_\_, 2016

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Martin Glenn  
United States Bankruptcy Judge