

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

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<i>In re:</i>	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (MG)
	:	f/k/a General Motors Corp., <i>et al.</i>
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	
	:	
MOTORS LIQUIDATION COMPANY AVOIDANCE	:	
ACTION TRUST, by and through the Wilmington Trust	:	
Company, solely in its capacity as Trust Administrator	:	Adversary Proceeding
and Trustee,	:	No. 09-00504 (MG)
	:	
Plaintiff,	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A. <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
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**STIPULATION AND ORDER, INTER ALIA, VACATING DEFAULT**

WHEREAS, on April 26, 2016, the Plaintiff filed an application for certificate of default against several defendants in the above-captioned adversary proceeding (“Action”), including against “GMAM Investment Funds Trust,” “Lehman GMAM Investment Funds Trust,” “Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust” and “RBC Dexia Investor Services Trust as Trustee for GM Canada Foreign Trust” (“Defendants”) [Adv. Proc. Docket No. 503];

WHEREAS, on May 3, 2016 (with respect to GMAM Investment Funds Trust, Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust and RBC Dexia Investor Services Trust as Trustee for GM Canada Foreign Trust) and May 4, 2016 (with respect

to Lehman GMAM Investment Funds Trust), the Clerk of the Court granted the Plaintiff's application for a certificate of default against the Defendants [Adv. Proc. Docket Nos. 511, 520, 521, 542] ("Certificates of Default"); and

WHEREAS, the Plaintiff and the Defendants agree that the Certificates of Default should be vacated;

**IT IS HEREBY ORDERED AS FOLLOWS:**

1. The Certificates of Default are vacated as to Defendants GMAM Investment Funds Trust, Lehman GMAM Investment Funds Trust, Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust and RBC Dexia Investor Services Trust as Trustee for GM Canada Foreign Trust.

2. The date by which the Defendants must answer, move or otherwise respond to 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 Action is hereby extended to thirty days following the Court's approval of this Stipulation and Order.

3. The Defendants and the Plaintiff expressly reserve and preserve any and all rights, claims, interests and defenses they each may have in connection with or related to the Action.

*[Remainder of the Page Intentionally Left Blank]*

Dated: New York, New York  
July 11, 2016

Respectfully submitted,  
  
KING & SPALDING LLP

By: /s/ Arthur J. Steinberg

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*Attorneys for GMAM Investment Funds Trust, Lehman  
GMAM Investment Funds Trust, Pension Inv Committee of  
GM for GM Employees Domestic Group Pension Trust and  
RBC Dexia Investor Services Trust as Trustee for GM  
Canada Foreign Trust*

BINDER SCHWARTZ LLP

By: /s/ Eric B. Fisher

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*Attorneys for Plaintiff*

Dated: July 12, 2016  
New York, New York

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**/s/Martin Glenn**  
MARTIN GLENN  
United States Bankruptcy Judge