

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

| | |
|-------------------------------------|--------------------------|
| ----- | X |
| | : |
| <i>In re:</i> | : |
| | : |
| | : Chapter 11 |
| MOTORS LIQUIDATION COMPANY, et al., | : |
| | : Case No. 09-50026 (MG) |
| Debtors | : (Jointly Administered) |
| | : |
| | : |

| | |
|--|------------------------|
| ----- | X |
| 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. <i>et al.</i> , | : |
| | : |
| Defendants. | : |

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**STIPULATION AND [PROPOSED] 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 the Ad Hoc Group of Term Lenders, identified in Appendix A attached hereto, 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 July 27, 2016.

Dated: New York, New York
July 13, 2016

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

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*Attorneys for Ad Hoc Group of Term Lenders
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Attorneys for Plaintiff

IT IS SO ORDERED:

By: _____
MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

Appendix A

Fire and Police Employees' Retirement System of the City of Baltimore
BBT Fund, L.P.
SRI Fund, L.P.
BBT Master Fund, L.P. (f/k/a Cap Fund, L.P.)
BlackRock Corporate High Yield Fund, Inc.
BlackRock Debt Strategies Fund, Inc.
BlackRock Floating Rate Income Strategies Fund, Inc.
BlackRock Funds II - High Yield Bond Portfolio
BlackRock Global Investment Series: Income Strategies Portfolio
BlackRock Fixed Income Portable Alpha (Offshore) Fund
BlackRock Senior Income Series II
BlackRock Senior Income Series IV
R3 Capital Partners Master, L.P.
The Galaxite Master Unit Trust
BlackRock High Yield Bond Portfolio, a series of BlackRock Funds II
High Yield Bond Portfolio
Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds
Delaware Enhanced Global Dividend and Income Fund
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 Dividend and Income Fund, Inc.
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
The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust
Optimum Fixed Income Fund, a series of Optimum Fund Trust
Drawbridge Special Opportunities Fund Ltd.
Drawbridge Special Opportunities Fund LP
Fortress Credit Investments I Ltd.
Fortress Credit Investments II Ltd.
FOUR CORNERS CLO II, LTD.
FOUR CORNERS CLO III, LTD.
GENESIS CLO 2007-1 LTD.
Guggenheim Portfolio X, LLC
Illinois Municipal Retirement Fund
The Lincoln National Life Insurance Company Separate Account 12
The Lincoln National Life Insurance Company Separate Account 20
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 (and the successor to LVIP Delaware Managed Fund as of June 15, 2009).

Golden Knight II CLO, Ltd.

Lord Abbett Investment Trust – Lord Abbett High Yield Fund

Lord Abbett Investment Trust – Lord Abbett Floating Rate Fund

Teachers’ Retirement System of Oklahoma

Houston Police Officers’ Pension System

Mason Capital, L.P.

Mason Capital, Ltd.

Neuberger Berman High Income Bond Fund

Neuberger Berman High Yield Strategies Fund Inc.

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 Company GP - Portable Alpha

MacKay Shields Core Plus Alpha Fund Ltd.

New York Life Insurance Company

North Dakota State Investment Board

Fairway Loan Funding Company

PIMCO Income Strategy Fund

PIMCO Income Strategy Fund II

Red River HYPi, L.P.

PIMCO Cayman Trust: PIMCO Cayman Bank Loan Fund

StocksPLUS, L.P. Fund B

PIMCO Funds: PIMCO Total Return Fund

PIMCO Funds: Private Account Portfolio Series High Yield Portfolio

PIMCO Funds: Global Investors Series plc, Global Investment Grade Credit Fund

Portola CLO, Ltd.

Mayport CLO, Ltd.

SHIPROCK FINANCE, SPC, on behalf of SF-3 Segregated Portfolio

Taconic Capital Partners 1.5 L.P.

Taconic Market Dislocation Fund II L.P.

Taconic Market Dislocation Master Fund II L.P.

Taconic Opportunity Fund L.P.

Virginia Retirement System