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6 Claimants as listed in Dkt. 222 and
Appendix A to Dkt. 241

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

9	In re:)	Chapter 11 Case
10	MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,)	Case No. 09-50026 (MG)
11	Debtors.)	(Jointly Administered)
12)	
13	MOTORS LIQUIDATION COMPANY)	
14	AVOIDANCE ACTION TRUST, by and through)	Adversary Proceeding
15	Wilmington Trust Company, solely in its capacity as)	Case No. 09-00504 (MG)
16	Trust Administrator and Trustee,)	
17	Plaintiff,)	
18	vs.)	
19	JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
20	Defendants.)	

21 **EX PARTE MOTION OF DEFENDANTS AND CROSS-CLAIMANTS**
THE TERM LOAN LENDERS TO FILE SUBMISSION UNDER SEAL

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1 Pursuant to § 107(b) of the Federal Bankruptcy Code, Federal Rule of Bankruptcy
2 Procedure 9018, and as permitted by Judge Glenn’s Chambers’ Rules for Sealing Orders,
3 Defendants and Cross-Claimants the Term Loan Lenders (“Cross-Claimants”) file this motion for
4 an *ex parte* order granting them leave to file their submission, dated September 12, 2016, under
5 seal.

6
7 This Court’s September 1, 2016 order (ECF No. 716) directed Cross-Claimants to file a
8 submission identifying documents on JPMorgan’s Amended Privilege Log as to which they, in
9 good faith, dispute JPMorgan’s continued assertion of privilege. The Cross-Claimants’
10 submission contains discussion of a confidential document produced in this matter that has been
11 marked “Confidential” pursuant to the terms of the Amended Agreed Protective Order signed by
12 this Court on April 18, 2016 (Dkt. No. 489). The Cross-Claimants therefore ask for this Court’s
13 permission to file their submission under seal.
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15 The Cross-Claimants have electronically filed a redacted version of their submission. The
16 redacted submission, along with this motion to seal, will be transmitted to counsel for all parties
17 via electronic filing. The Cross-Claimants will provide to the Court, and to counsel for all parties
18 subject to the Protective Order, a copy of the unredacted submission by electronic mail.

19 No previous request for the relief sought herein has been made by the Cross-Claimants to
20 this or any other court.

21
22 WHEREFORE the Cross-Claimants respectfully request entry of an order substantially in
23 the form of Appendix A to this motion, granting the relief requested and such other and further
24 relief as is just and proper.

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27 DATED: September 12, 2016
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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

**EX PARTE ORDER GRANTING THE EX PARTE MOTION OF
DEFENDANTS AND CROSS-CLAIMANTS THE TERM LOAN
LENDERS TO FILE SUBMISSION UNDER SEAL**

Upon consideration of the *Ex Parte* Motion of Defendants and Cross-Claimants the Term Loan Lenders to File Submission Under Seal, dated September 12, 2016, for an order pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018 to authorize the Cross-Claimants to file an unredacted submission under seal, the Court finds and determines that it has jurisdiction to rule on this Motion under 28 U.S.C. §§ 157 and 1334; consideration of the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b); the Cross-Claimants have provided due and proper notice of the Motion and no further notice is necessary; and the legal and factual bases set forth in the Motion establish just and sufficient cause to grant the relief requested herein.

IT IS HEREBY ORDERED THAT:

1. The Motion to File Submission Under Seal is granted.
2. Pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018, the Cross-Claimants are authorized to file their submission under seal.
3. Upon the conclusion of the above-captioned adversary proceeding, the Cross-Claimants shall move to unseal or dispose of the confidential information in the submission.
4. This order is without prejudice to the rights of any party in interest or the United States Trustee to seek to unseal the submission or any part of it.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Dated: September __, 2016
New York, New York

/_____
MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE