

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

In re:

MOTOR LIQUIDATION COMPANY, *et al.*,

Debtors.

MOTOR LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST, by and through the
Wilmington Trust Company, solely in its capacity as
Trust Administrator and Trustee,

Plaintiff,

vs.

JP MORGAN CHASE BANK, N.A., *et al.*

Defendants.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504

(MG)

**STIPULATION AND ORDER VACATING CERTIFICATES OF DEFAULT AND
EXTENDING TIME TO ANSWER AMENDED COMPLAINT**

WHEREAS, on April 26, 2016, the Plaintiff filed an application for certificates of default against several defendants in the above-captioned adversary proceeding (“Action”), including against “Oaktree – Employees Retirement Funds of the City of Dallas”, which is intended to be the Dallas Employee Retirement Fund (“DERF”) [Adv. Proc. Doc. No. 503];

WHEREAS, on May 4, 2016, the Clerk of the Court filed a certificate of default

against DERF [Adv. Proc. Docket No. 540] ("Certificate of Default"); and

WHEREAS, the Plaintiff and the DERF agree that the Certificate of Default should
be vacated

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Certificate of Default is vacated as to Defendant "Oaktree – Employees Retirement Funds of the City of Dallas".
2. The date by which DERF 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. Doc. No. 91] in the Action is hereby extended to September 30, 2016.
3. DERF 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.

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Respectfully submitted,

HAHN & HESSEN LLP

By: /s/ Mark T. Power

Mark T. Power
(mpower@hahnhessen.com)
Alison M. Ladd
(aladd@hahnhessen.com) 488
Madison Avenue
New York, NY 10022
Telephone: (212) 478-7200
Facsimile: (212) 478-7400

Attorneys for the Dallas Employee Retirement Fund

BINDER SCHWARTZ LLP

By: /s/ Eric B. Fisher

Eric B. Fisher
(efisher@binderschwartz.com)
Michael M. Hodgson
(mhodgson@binderschwartz.com)

366 Madison Avenue, 6th Floor New
York, NY 10017
Tel: (212) 510-7008

Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: September 14, 2016
New York, New York

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge