

HAHN & HESSEN LLP

Mark T. Power, Esq.
Alison M. Ladd, Esq.
488 Madison Avenue
New York, New York 10022
Telephone: (212) 478-7200
Facsimile: (212) 478-7400

*Attorneys for Certain TLI Defendants,
including Foothill CLO I, Ltd., Gulf
Stream-Compass CLO 2007-Ltd.,
Gulf Stream-Sextant CLO 2007-1
Ltd., Raytheon Master Pension Trust
and Dallas Employee Retirement Fund*

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,

Debtors.

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

Plaintiff,

-against-

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

Defendants.

Chapter 11 Case

Case No. 09-50026 (MG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (MG)

SUPPLEMENTAL RULE 7007.1 STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, made applicable to this proceeding pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, and to enable Bankruptcy Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for certain TLI Defendants¹ certify that:

1. Defendant Foothill CLO I, Ltd. is an exempted company incorporated in the Cayman Islands with limited liability. INTERTRUST SPV (CAYMAN) LIMITED is the only business entity that owns 10% or more of the equity interests in Foothill CLO I, Ltd.

2. Defendant Gulf Stream-Compass CLO 2007-Ltd. does not have a parent company. CEDE & Co. owns 32.8% of Gulf Stream-Compass CLO 2007-Ltd. and (ii) Goldman Sachs & Co. owns 46.77% of Gulf Stream-Compass CLO 2007-Ltd.

3. Defendant Gulf Stream-Sextant CLO 2007-1 Ltd. does not have a parent company. CEDE & Co. owns 32.8% of Gulf Stream-Sextant CLO 2007-1 Ltd. and (ii) Goldman Sachs & Co. owns 46.77% of Gulf Stream-Sextant CLO 2007-1 Ltd.

4. Defendant Raytheon Master Pension Trust does not have a parent company and no publicly traded company owns 10% or more of its stock.

5. Defendant Dallas Employee Retirement Fund is a governmental entity, and, therefore, is not required to report pursuant to Rule 7007.1.

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¹ A Rule 7007.1 Statement was filed on December 16, 2015 on behalf of the other TLI Defendants [D.I. 316]. The TLI Defendants identified herein have only recently appeared in this adversary proceeding.

Dated: New York, New York
September 20, 2016

Respectfully submitted,

HAHN & HESSEN LLP

By: /s/ Mark T. Power

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

*Attorneys for Certain Term Loan Investor Defendants,
including Foothill CLO I, Ltd., Gulf Stream-Compass CLO
2007-Ltd., Gulf Stream-Sextant CLO 2007-1 Ltd., Raytheon
Master Pension Trust and Dallas Employee Retirement Fund*