

**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)
	: :
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	: :
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 [PROPOSED] ORDER, INTER ALIA, VACATING DEFAULT

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 "Double Black Diamond Offshore Ltd." ("Defendant") [Adv. Proc. Docket No. 503];

WHEREAS, on May 4, 2016, the Clerk of the Court granted the Plaintiff's application for a certificate of default against the Defendant [Adv. Proc. Docket No. 546] ("Certificate of Default"); and

WHEREAS, the Plaintiff and the Defendant 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 Double Black Diamond Offshore Ltd..
2. The date by which the Defendant 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 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.

Dated: New York, New York
September 29, 2016

Respectfully submitted,

SIDLEY AUSTIN LLP

By: /s/ Nicholas Lagemann

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Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: New York, New York
_____, 2016

/s/
MARTIN GLENN
United States Bankruptcy Judge