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October 6, 2016

Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, NY 10004-1408

Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank N.A., et al.*, Adv. Pro. 09-00504

Dear Judge Glenn:

JPMorgan and Cross-Claimants write jointly to report that the parties have resolved their current dispute regarding JPMorgan's advice of counsel defense and the related waiver of privilege. As detailed in a joint status update provided to the Court on September 19, 2016, the parties continued to meet and confer in an effort to resolve their disagreement. Following a meet and confer on September 19, 2016, JPMorgan agreed to review its entire Amended Privilege Log (entries 1 through 326) in light of concerns and questions raised by Cross-Claimants. On September 30, 2016, JPMorgan agreed to provide Cross-Claimants with all 13 documents marked as "Category 1" in Cross-Claimants' submission to the Court dated September 12, 2016 (Dkts. 723 and 730), as well as 14 additional documents from "Category 2" or otherwise identified on the log (some in redacted form).

Having reviewed this supplemental production of documents, Cross-Claimants do not intend to seek additional documents from JPMorgan's Amended Privilege Log entries 1 through 326, as they are satisfied by JPMorgan's good-faith representation that the remaining entries on the log do not discuss or concern the following topics: JPMorgan's relationship with counsel generally; the scope of work performed by counsel and counsel's engagement; counsel's performance; the role of such counsel; counsel's work regarding the Term Loan collateral, liens, security interests, or UCC statements; the Term Loan collateral, liens on such collateral, the value of such collateral and/or the release of such collateral.

The parties appreciate the Court's willingness to oversee this process. Additional issues related to privilege and the advice of counsel defense may still arise, given certain ongoing discussions about additional document productions, and the parties will continue to meet and confer before bringing to the Court's attention any further disagreements.

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Respectfully submitted,

John Spiegel xLCB
John W. Spiegel

cc: All Counsel of Record (via ECF)