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December 15, 2016

By Hand, Email, and ECF

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

Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank, N.A., et al.*, Adv. Pro. No. 09-00504 (MG)

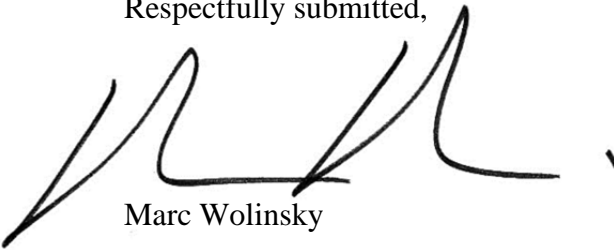
Dear Judge Glenn:

We are co-counsel with Kelley Drye & Warren LLP to defendant JPMorgan Chase Bank, N.A. We respectfully submit this joint letter on behalf of both JPMorgan and plaintiff, the Motors Liquidation Company Avoidance Action Trust, to schedule a time for the Court to hear a scheduling dispute that has arisen between the parties regarding the timing for expert rebuttal reports related to fixture/non-fixture issues. Under the current schedule in the case, expert rebuttal reports are due on Wednesday, December 21, 2016, with expert depositions due to conclude January 27, 2016.

The parties would like to address this dispute at a telephonic conference with the Court tomorrow or Monday. Alternatively, if the Court prefers, the parties can also raise this issue at the Status Conference scheduled in the above-captioned action for December 20, 2016 at 10 a.m.

The Honorable Martin Glenn
December 15, 2016
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Respectfully submitted,

A handwritten signature in black ink, consisting of several fluid, connected strokes. The signature is positioned above the printed name 'Marc Wolinsky'.

Marc Wolinsky

cc: Counsel of Record (by ECF and email)