

Bruce Bennett (admitted *pro hac vice*)

JONES DAY

555 South Flower Street, 50th Floor

Los Angeles, CA 90071

Tel: (213) 489-3939

John W. Spiegel (admitted *pro hac vice*)

MUNGER, TOLLES & OLSON LLP

355 South Grand Avenue, 35th Floor

Los Angeles, CA 90071

Tel: (213) 683-9100

Attorneys for Avery Point CLO, Limited; Chatham Light II CLO, Limited; Katonah III, Ltd.;
Katonah IV, Ltd.; Nash Point CLO; Race Point II CLO, Limited; Race Point III CLO, Limited;
Race Point IV CLO, Ltd.; and Sankaty High Yield Partners III Grantor Trust as successor in
interest to Sankaty High Yield Partners III, L.P.

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

In re:)	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,)	Case No. 09-50026 (REG)
Debtors.)	(Jointly Administered)
MOTORS LIQUIDATION COMPANY)	
AVOIDANCE ACTION TRUST, by and through)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as)	Case No. 09-00504 (REG)
Trust Administrator and Trustee,)	
Plaintiff,)	
vs.)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	

RULE 7007.1 DISCLOSURE

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, and in accordance with the *Memorandum Opinion and Order Denying the Moving Term Loan Lenders' Motion to Seal* (Dkt. No. 811), Defendants Avery Point CLO, Limited; Chatham Light II CLO, Limited; Katonah III, Ltd.; Katonah IV, Ltd.; Nash Point CLO; Race Point II CLO, Limited; Race Point III CLO, Limited; Race Point IV CLO, Ltd.; and Sankaty High Yield Partners III Grantor Trust as successor in interest to Sankaty High Yield Partners III, L.P., by and through their undersigned attorneys, certify the following:

Avery Point CLO, Limited is a corporation organized under the laws of the Cayman Islands. Sankaty Credit Opportunities II, LP, Sankaty Credit Opportunities IV, LP, Sankaty Credit Opportunities (Offshore Master) IV, LP, and Sankaty Credit Opportunities Grantor Trust are the only business entities that own 10% or more of the equity interests in Avery Point CLO, Limited.

Chatham Light II CLO, Limited is a corporation organized under the laws of the Cayman Islands. Sankaty Credit Opportunities II, LP, Sankaty Credit Opportunities Grantor Trust, and Prospect Harbor Designated Investments, LP are the only business entities that own 10% or more of the equity interests in Chatham Light II CLO, Limited.

Katonah III, Ltd. is a corporation organized under the laws of the Cayman Islands. Ell & Co., Hare & Co., JEFSCO, Kohlberg Capital LLC, and SR Group, LLC are the only business entities that own 10% or more of the equity interests in Katonah III, Ltd.

Katonah IV, Ltd. is a corporation organized under the laws of the Cayman Islands. Katonah IV, Ltd. is not aware of any business entities that own 10% or more of the equity interests of Katonah IV, Ltd.

Nash Point CLO is a corporation organized under the laws of Ireland. Sankaty Credit Opportunities II, LP and Prospect Harbor Designated Investments, LP are the only business entities that own 10% or more of the equity interests in Nash Point CLO.

Race Point II CLO, Limited is a corporation organized under the laws of the Cayman Islands. Howard Hughes Medical Institute DBA HHMI Cayman I Company, Sankaty High Yield Partners III Grantor Trust, Sankaty Credit Opportunities II, LP, and Sankaty Credit Opportunities Grantor Trust are the only business entities that own 10% or more of the equity interests in Race Point II CLO, Limited.

Race Point III CLO, Limited is a corporation organized under the laws of Ireland. Sankaty Credit Opportunities II, LP and Prospect Harbor Designated Investments, LP are the only business entities that own 10% or more of the equity interests in Race Point III CLO, Limited.

Race Point IV CLO, Ltd. is a corporation organized under the laws of the Cayman Islands. Sankaty Credit Opportunities II, LP and Sankaty Credit Opportunities III, LP are the only business entities that own 10% of the equity interests in Race Point IV CLO, Ltd.

Sankaty High Yield Partners III Grantor Trust as successor in interest to Sankaty High Yield Partners III, L.P. is a statutory trust organized under the laws of Delaware. MB Global Partners, Deutsche Banc Alex. Brown Special Opportunities Fund, LLC, and AXA (Schuldschein) are the only business entities that own 10% or more of the equity interests in Sankaty High Yield Partners III Grantor Trust as successor in interest to Sankaty High Yield Partners III, L.P.

Dated: December 20, 2016

Respectfully submitted,

/s/ Bruce Bennett

Bruce Bennett
Erin Burke
JONES DAY
555 South Flower Street, 50th Floor
Los Angeles, CA 90071
Tel: (213) 489-3939
Email: bbennett@jonesday.com
Email: eburke@jonesday.com

Gregory Shumaker
Christopher DiPompeo
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Tel: (202) 879-3939
Email: gshumaker@jonesday.com
Email: cdipompeo@jonesday.com

John W. Spiegel
George M. Garvey
Todd J. Rosen
Matthew A. Macdonald
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071
Tel: (213) 683-9100
Email: john.spiegel@mto.com
Email: george.garvey@mto.com
Email: todd.rosen@mto.com
Email: matthew.macdonald@mto.com

*Attorneys for Avery Point CLO, Limited;
Chatham Light II CLO, Limited; Katonah III,
Ltd.; Katonah IV, Ltd.; Nash Point CLO; Race
Point II CLO, Limited; Race Point III CLO,
Limited; Race Point IV CLO, Ltd.; and
Sankaty High Yield Partners III Grantor Trust
as successor in interest to Sankaty High Yield
Partners III, L.P.**

*[*a complete list of represented Defendants
appears in Appendix A to the Consent Motion
to Withdraw (Dkt. No. 753)]*

CERTIFICATE OF SERVICE

I hereby certify that, on December 20, 2016, I caused to be served a true and correct copy of the *Rule 7007.1 Disclosure* filed by Avery Point CLO, Limited; Chatham Light II CLO, Limited; Katonah III, Ltd.; Katonah IV, Ltd.; Nash Point CLO; Race Point II CLO, Limited; Race Point III CLO, Limited; Race Point IV CLO, Ltd.; and Sankaty High Yield Partners III Grantor Trust as successor in interest to Sankaty High Yield Partners III, L.P. by operation of the Case Management/Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of New York (the "CM/ECF System") upon all parties registered in the CM/ECF System.

/s/ Bruce Bennett
Bruce Bennett
JONES DAY
555 South Flower Street, 50th Floor
Los Angeles, CA 90071
Tel: (213) 489-3939
Email: bbennett@jonesday.com