

BINDER & SCHWARTZ LLP

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Company Avoidance Action Trust*

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

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11
Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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

Adversary Proceeding
Case No. 09-00504 (MG)

Plaintiff,

against

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

Defendants.
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**NOTICE OF AGENDA OF MATTERS SCHEDULED TO BE ADRESSED AT CASE
MANAGEMENT CONFERENCE ON FEBRUARY 14, 2017 AT 10:30 AM (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, Courtroom 523, One Bowling Green, New York, NY 10004-1408.

The following issues are scheduled to be addressed at the Case Management Conference scheduled for February 14, 2017, at 10:30 a.m. (EST) in the above-referenced Adversary Proceeding:

- I. Potential Judicial Site Visits
 - A. Letter to the Court from the Avoidance Action Trust, dated February 3, 2017 [Dkt. No. 834]
 - B. Letter to the Court from the Defendants' Steering Committee, dated February 3, 2017 [Dkt. No. 835]
 - C. Letter to the Court from General Motors LLC ("New GM"), dated February 6, 2017 [Dkt. No. 838]
- II. Requests for Summary Judgment In Advance of Representative Asset Trial Regarding Lansing Fixture Filing and Valuation Methodology
 - A. Letter to the Court from the Defendants' Steering Committee, dated February 3, 2017 [Dkt. No. 836]
 - B. Letter to the Court from the Avoidance Action Trust, dated February 3, 2017 [Dkt. No. 837]
- III. Request for Summary Judgment Motions Relating to the Effectiveness of the UCC-3 Termination Statement and Affirmative Defenses of Earmarking and Constructive Trust
 - A. Letter to the Court from the Avoidance Action Trust, dated February 10, 2017 [Dkt. No. 841]
 - B. Letter to the Court from a group of Term Lenders, dated February 13, 2017 [Dkt. No. 843]

Dated: February 13, 2017
New York, New York

Respectfully submitted,

BINDER & SCHWARTZ LLP

/s/Eric B. Fisher _____

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