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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.
-----X

**PLAINTIFF'S UNOPPOSED MOTION TO FILE
A SINGLE BRIEF IN EXCESS OF PAGE LIMIT IN
REPLY TO DEFENDANTS' OMNIBUS OPPOSITION BRIEF**

The Motors Liquidation Company Avoidance Action Trust (the “**Trust**”), by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee, respectfully moves for an order permitting the Trust to file a single reply brief not exceeding 25 pages, which will respond to one of the three opposition briefs filed by JPMorgan Chase Bank, N.A. and the other members of the Defendants’ Steering Committee (collectively, “**Defendants**”). In support of its motion, the Trust states as follows:

1. On March 8, 2017, the Trust filed seven motions *in limine*.
2. On March 22, 2017, with the Court’s approval, Defendants filed a single 67-page omnibus brief (the “**Omnibus Opposition Brief**”) in response to four of those motions, specifically, (1) the Motion *in Limine* to Exclude the KPMG Report and its Schedules and Work Papers [ECF # 872], (2) the Motion *in Limine* to Exclude the Expert Report and Testimony of Abdul Lakhani [ECF # 869], (3) the Motion *in Limine* to Exclude the Expert Reports and Testimony of Glenn Hubbard [ECF # 870] and (4) the Motion *in Limine* to Exclude the Expert Reports and Testimony of Maryann Keller [ECF # 871] (together, the “**Valuation Motions in Limine**”).
3. The Trust’s reply briefs in further support of the Valuation Motions *in Limine* are to be filed with the Court on March 31, 2017.
4. The Court’s Chambers’ Rules provide that “reply briefs shall be no more than 10 pages.”
5. The Trust respectfully requests permission to file a single brief in reply to the Omnibus Opposition Brief not to exceed 25 pages (fewer than the 40 pages that would be permitted if each reply brief were filed separately).

6. Defendants have advised that they have no objection to this request.

Dated: March 28, 2017
New York, New York

Respectfully submitted,

BINDER & SCHWARTZ LLP

/s/Neil S. Binder

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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

Plaintiff,

Case No. 09-00504 (MG)

against

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

Defendants.
-----x

**[PROPOSED] ORDER ALLOWING PLAINTIFF TO
FILE A SINGLE BRIEF IN EXCESS OF PAGE LIMIT
IN REPLY TO DEFENDANTS' OMNIBUS OPPOSITION BRIEF**

Upon the motion, dated March 28, 2017 (the “**Motion**”) of the Motors Liquidation Company Avoidance Action Trust (the “**Trust**”), by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee, for leave to file a single brief not to exceed 25 pages in reply to the 67-page omnibus brief (the “**Omnibus Opposition Brief**”) filed by JPMorgan Chase Bank, N.A. and the other members of the Defendants’ Steering Committee, in response to four of the Trust’s motions *in limine* to exclude (1) the KPMG Report and its Schedules and Work Papers [ECF # 872], (2) the Expert Report and Testimony of Abdul Lakhani [ECF # 869], (3) the Expert Reports and Testimony of Glenn Hubbard [ECF # 870], and (4) the Expert Reports and Testimony of Maryann Keller [ECF # 871], and upon sufficient cause

therefor, it is:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the Trust may file a single brief not to exceed 25 pages in reply
to the Omnibus Opposition Brief.

Dated: _____, 2017
New York, New York

Honorable Martin Glenn
United States Bankruptcy Judge