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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

MOTORS LIQUIDATION COMPANY, *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

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

Plaintiff,

-against-

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

Defendants.

Adversary Proceeding
Case No.: 09-00504 (MG)

**JOINDER OF WELLS CAP MGMT – 13923601 TO
CONDITIONAL MOTION FOR LEAVE TO CROSS-APPEAL
AND TO NOTICE OF CROSS-APPEAL**

PLEASE TAKE NOTICE that defendant Wells Cap Mgmt – 13923601 (“Wells Cap”) hereby joins (i) the conditional motion for leave to cross-appeal filed by certain defendants in

this action [*Docket Nos. 1027-1029*] and (ii) the related notice of cross-appeal [*Docket No. 1026*].

Wells Cap joins, adopts and incorporates herein by reference all of the arguments and authorities contained in the conditional motion.

Dated: November 16, 2017
New York, New York

Respectfully submitted,

BECKER, GLYNN, MUFFLY,
CHASSIN & HOSINSKI LLP

By: 

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