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*Attorneys for GoldenTree Loan Opportunities III,
Ltd. and GoldenTree Loan Opportunities IV, Ltd.*

**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

Plaintiff,

Case No. 09-00504 (MG)

against

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

Defendants.

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**STIPULATION AND [PROPOSED] ORDER
DISMISSING ADVERSARY PROCEEDING AGAINST
GOLDENTREE LOAN OPPORTUNITIES III, LTD.
AND GOLDENTREE LOAN OPPORTUNITIES IV, LTD.**

WHEREAS, on May 20, 2015, Plaintiff filed a First Amended Adversary Complaint for
(1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of the Postpetition Transfers,

(3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants (“**Amended Complaint**”) (ECF No. 91) and thereafter served the Amended Complaint on, among others, defendants GoldenTree Loan Opportunities III, Ltd. (“**GoldenTree III**”) and GoldenTree Loan Opportunities IV, Ltd. (“**GoldenTree IV**”, and together with GoldenTree III, the “**Defendants**”);

WHEREAS, the Amended Complaint alleges that: (i) on or about May 27, 2009, GoldenTree III received a pre-petition transfer in the amount of \$69,945.48 and GoldenTree IV received a pre-petition transfer in the amount of \$69,851.34 (together, the “**Pre-Petition Transfers**”) and (ii) on or about June 30, 2009, GoldenTree III received a post-petition transfer in the amount of \$1,613.96 and GoldenTree IV received a post-petition transfer in the amount of \$1,611.79 (together, the “**Post-Petition Transfers**”, and together with the Pre-Petition Transfers, the “**Transfers**”); and

WHEREAS, the Amended Complaint alleges that the Transfers were made pursuant to a certain term loan agreement, dated as of November 29, 2006, as amended by that certain first amendment dated as of March 4, 2009 (the “**Term Loan Agreement**”);

WHEREAS, on July 27, 2016, Defendants filed an Answer to the Amended Complaint (ECF No. 691); and

WHEREAS, on November 17, 2016, the Court entered a stipulation and order dismissing with prejudice the claims against Defendants relating to the Pre-Petition Transfers (ECF No. 788);

WHEREAS, Defendants represent that, to the best of their knowledge, they did not receive any funds relating to the Term Loan Agreement on or after June 30, 2009, other than the Post-Petition Transfers;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties, that Defendants are dismissed from this adversary proceeding and any and all claims against Defendants arising out of or relating to the Term Loan Agreement are dismissed with prejudice.

Dated: New York, New York
July 10, 2018

New York, New York
July 10, 2018

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SO ORDERED

Dated: New York, New York
_____, 2018

Martin Glenn, United States Bankruptcy Judge