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**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 (MG)
Debtors.	:	(Jointly Administered)
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)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various Lenders Party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

**NOTICE OF TERM LENDERS’ MOTION FOR PARTIAL SUMMARY
JUDGMENT REGARDING FIXTURES AT SHREVEPORT ASSEMBLY**

Upon the accompanying (i) Memorandum of Law in Support of Term Lenders’ Motion for Partial Summary Judgment Regarding Fixtures at Shreveport Assembly; (ii) Rule 7056-1(b) Statement of Undisputed Material Facts of Term Lenders in Support of Their Motion for Partial Summary Judgment Regarding Fixtures at Shreveport Assembly; and (iii) the Declaration of Joseph C. Celentino in Support of Term Lenders’ Motion for Partial Summary

Judgment Regarding Fixtures at Shreveport Assembly, together with the exhibits identified therein and annexed thereto, all filed herewith, the undersigned defendants (the “Term Lenders”) hereby move this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure as incorporated into Rule 7056 of the Federal Rules of Bankruptcy Procedure, and Rule 7056-1 of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Southern District of New York, for entry of an order granting partial summary judgment that the challenge by plaintiff, the Motors Liquidation Company Avoidance Action Trust, to defendants’ perfected security interest in all fixtures installed at Shreveport Assembly before February 16, 2007, is barred by the statute of limitations.

Dated: September 14, 2018
New York, New York

Respectfully submitted,

JONES DAY

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