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Attorneys for Continental Casualty Company

**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.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)
(Jointly Administered)

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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,

Plaintiff,

against

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

Defendants.

Adversary Proceeding
Case No. 09-00504 (REG)

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**DEFENDANT CONTINENTAL CASUALTY COMPANY'S
JOINER IN RESPONSE OF THE TERM LOAN LENDERS TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE TERM LOAN
LENDERS' EFFECTIVENESS DEFENSE**

Defendant Continental Casualty Company (“Continental”), by its undersigned counsel, in accordance with the *Stipulation and Order Amending and Superseding Certain Prior Orders Regarding Discovery and Scheduling* entered on September 14, 2018 [Docket No. 1080] (the “Scheduling Order”), in addition to joining as a signatory to the *Term Lenders’ Opposition to Plaintiff’s Motion for Partial Summary Judgment on Certain Assets Located at GM Shreveport Assembly* (10/12/18) [Docket No. 1101] and *Term Lenders’ Response to Plaintiff’s Statement of Material Facts Regarding Assets Located at GM Shreveport Assembly* (10/12/18) [Docket No. 1103], hereby also joins the *Response of the Term Loan Lenders to Plaintiff’s Motion for Partial Summary Judgment on the Term Loan Lenders’ Effectiveness Defense* (10/12/18) [Docket No. 1097] and *The Term Loan Lenders’ Counter-Statement of Material Facts Pursuant to Local Bankruptcy Rule 7056-1* (10/12/18) [Docket No. 1098].

WHEREFORE, Continental Casualty Company respectfully requests that judgment be entered in its favor and against the Motors Liquidation Company Avoidance Action Trust; for an award of its fees and costs; and for such other and further relief as the Court deems just and proper.

Chicago, IL
October 12, 2018

Respectfully submitted,

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-and-

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