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*Attorneys for (i) Virtus Multi-Sector Short  
Term Bond Fund, (ii) Virtus Multi-Sector  
Intermediate Bond Fund, (iii) Virtus Senior  
Floating Rate Fund, (iv) Virtus Multi-Sector  
Fixed Income Series and (v) Phoenix Multi  
Sector Short Term Bond Series*

**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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**JOINDER OF CERTAIN DEFENDANTS IN RESPONSE  
OF CERTAIN TERM LOAN LENDER DEFENDANTS TO PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT [DOCKET NO. 1097]**

Virtus Multi-Sector Short Term Bond Fund; Virtus Multi-Sector Intermediate Bond Fund, sued herein as Virtus Multi-Sector Fixed Income Fund; Virtus Senior Floating Rate Fund; Virtus Multi-Sector Fixed Income Series f/k/a Phoenix Edge SRS-Multi Sector Fixed Income Series; and Phoenix Multi Sector Short Term Bond Series, sued herein as Phoenix Edge Series Fund Phoenix Multi Sector Short Term Bond Series, (“Defendants”), through their undersigned counsel, as and for their response to the Plaintiff’s *Motion for Partial Summary Judgment on Assets at Shreveport Plant* [Docket Nos.: 1090-1092] (the “Motion”), hereby join in the *Terms Lenders’ Opposition to Plaintiff’s Motion for Partial Summary Judgment on Certain Assets Located at GM Shreveport Assembly* [Docket No. 1101-1102] and hereby join *Term Loan Lenders’ Response to Plaintiff’s Statement of Material Facts Regarding Assets Located at GM Shreveport Assembly* [Docket No. 1103], and incorporate and adopt same as if fully set forth herein.

WHEREFORE, the Defendants respectfully request that the Court deny the Motion in its entirety and grant such other relief as the Court deems just and proper.

Dated: October 12, 2018  
New York, New York

KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP

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