



Eric B. Fisher
Binder & Schwartz LLP
366 Madison Avenue 6th Floor
New York, NY 10017

(T) 212.933.4551
(F) 212.510.7299
efisher@binderschwartz.com

October 23, 2018

Via ECF, Email and Hand Delivery

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, New York 10004

Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank, N.A.*, Case No. 09-00504 (MG)

Dear Judge Glenn:

We represent plaintiff Motors Liquidation Company Avoidance Action Trust. Plaintiff's reply in further support of its Motion for Partial Summary Judgment Dismissing the Non-JPMorgan Term Lenders' Effectiveness Defense is due to be filed this Friday, October 26, 2018. We write respectfully to request the Court's permission to file a 15-page reply brief. Among other reasons, the additional five pages are necessary to address two expert declarations submitted by the Non-JPMorgan Term Lenders in connection with their opposition to plaintiff's motion. We have conferred with Munger Tolles & Olson LLP, counsel for certain Non-JPMorgan Term Loan Lenders, and they do not object to this request.

We thank the Court for its attention to this request to exceed the reply brief page limit by five pages.

Respectfully,

/s/Eric B. Fisher
Eric B. Fisher

cc: All counsel of record (by ECF)

The request to exceed the reply brief page limit is GRANTED.

MEMORANDUM ENDORSED.
IT IS SO ORDERED.

DATED: OCTOBER 23, 2018
NEW YORK, NEW YORK

/s/MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE