

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: Chapter 11
MOTORS LIQUIDATION COMPANY, f/k/a Case No. 09-50026 (MG)
GENERAL MOTORS CORPORATION, *et al.*, (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,

Plaintiff Adversary Proceeding Case

against No. 09-00504 (MG)

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

Defendants.

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**STIPULATION AND ORDER AMENDING THE
SEPTEMBER 14, 2018 SCHEDULING ORDER (ECF NO. 1080)
AND THE OCTOBER 11, 2018 AMENDED SCHEDULING ORDER (ECF NO. 1094)**

WHEREAS, on September 14, 2018, the Court entered a *Stipulation and Order Amending and Superseding Certain Prior Orders Regarding Discovery and Scheduling* (ECF No. 1080) (the “**September 14, 2018 Scheduling Order**”), setting forth the schedule for ongoing proceedings on Motion Issues, Initial Discovery and Trial Issues, and Final Discovery and Trial Issues (all capitalized terms not defined herein have the meanings defined in the September 14, 2018 Scheduling Order);

WHEREAS, on October 11, 2018, the Court entered a *Stipulation and Order Amending the September 14, 2018 Scheduling Order (ECF NO. 1080)* (ECF No. 1094) (the “**October 11, 2018 Amended Scheduling Order**”), that amended the September 14, 2018 Scheduling Order

with respect to the document and fact discovery deadlines and the expert witness disclosure deadline related to Initial Discovery and Trial Issues;

WHEREAS, pursuant to the September 14, 2018 Scheduling Order and the October 11, 2018 Amended Scheduling Order, the Plaintiff and the members of the Defendants' Steering Committee have been diligently working to obtain the necessary document discovery related to Initial Discovery and Trial Issues from third-parties but will not be able to complete document discovery on or before November 30, 2018, nor fact discovery on or before December 21, 2018, as set forth in the October 11, 2018 Amended Scheduling Order, because of delays in third-party productions, and in turn, will not be able to complete the expert discovery by the deadlines set forth in the September 14, 2018 Scheduling Order;

WHEREAS, good cause exists for amending the discovery deadlines related to Initial Discovery and Trial Issues because doing so will permit all parties opportunity to complete document, fact and expert discovery necessary for a trial;

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the September 14, 2018 Scheduling Order and the October 11, 2018 Amended Scheduling order are amended, with respect to discovery deadlines related to Initial Discovery and Trial Issues, as follows:

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|--------------------------|--|
| December 21, 2018 | Deadline for document discovery related to Initial Discovery and Trial Issues; Deadline to disclose expert witnesses and topics that will be the subject of expert testimony |
| January 23, 2019 | Deadline for fact discovery related to Initial Discovery and Trial Issues |
| February 12, 2019 | Deadline for exchange of expert reports related to Initial Discovery and Trial Issues |

March 5, 2019	Deadline for exchange of rebuttal expert reports related to Initial Discovery and Trial Issues
April 2, 2019	Deadline for expert discovery / close of discovery related to Initial Discovery and Trial Issues
TBD by the Court	Pre-trial conference; trial dates; pre- and post-trial briefing

NO FURTHER EXTENSIONS OF DEADLINES WILL BE GRANTED. Except as set out herein, the Court's September 14, 2018 Scheduling Order remains in full force and effect.

Dated: New York, New York
November 26, 2018

New York, New York
November 26, 2018

BINDER & SCHWARTZ LLP

WACHTELL, LIPTON, ROSEN & KATZ

By: /s/ Eric B. Fisher
Eric B. Fisher
Neil S. Binder
Lindsay A. Bush
Lauren K. Handelsman
366 Madison Avenue, 6th Floor
New York, New York 10017
Telephone: (212) 510-7008
Facsimile: (212) 510-7299
Email: efisher@binderschwartz.com

By: /s/ Marc Wolinsky
Harold S. Novikoff
Marc Wolinsky
Amy R. Wolf
51 West 52nd Street
New York, New York 10019
Telephone: (212) 403-1000
Email: MWolinsky@wlrk.com

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy
John M. Callagy
Nicholas J. Panarella
Martin A. Krolewski
101 Park Avenue
New York, New York 10178
Telephone: (212) 808-7800
Email: jcallagy@kelleydrye.com

*Attorneys for Plaintiff Motors Liquidation
Company Avoidance Action Trust*

JONES DAY

By: /s/ C. Lee Wilson

C. Lee Wilson
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3885
Email: clwilson@jonesday.com

Attorneys for Defendant JPMorgan Chase Bank, N.A.

JONES DAY

By: /s/ Bruce Bennett

Bruce Bennett
Erin L. Burke
555 South Flower Street, 50th Floor
Los Angeles, California 90071
Telephone: (213) 489-3939
Email: bbennett@jonesday.com
Email: eburke@jonesday.com

Gregory M. Shumaker
Christopher J. DiPompeo
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Email: gshumaker@jonesday.com
Email: cdipompeo@jonesday.com

MUNGER, TOLLES & OLSON LLP

By: /s/ John W. Spiegel

John W. Spiegel
Matthew A. Macdonald
Bradley R. Schneider
350 South Grand Avenue, 50th Floor
Los Angeles, California 90071
Telephone: (213) 683-9100
Email: john.spiegel@mto.com
Email: matthew.macdonald@mto.com
Email: bradley.schneider@mto.com

Nicholas D. Fram
560 Mission Street, 27th Floor
San Francisco, California 94105
Telephone: (415) 512-4000
Email: nicholas.fram@mto.com

*Attorneys for the Term Loan Lenders Listed on
Appendix A to Dkt. No. 241*

**KASOWITZ BENSON TORRES & FRIEDMAN
LLP**

By: /s/ Andrew K. Glenn
Andrew K. Glenn
Joshua N. Paul
Michelle G. Bernstein
Frank S. DiCarlo
1633 Broadway
New York, New York 10019
(212) 506-1700
Email: aglenn@kasowitz.com
Email: jpaul@kasowitz.com
Email: mgenet@kasowitz.com
Email: fdicarlo@kasowitz.com

*Attorneys for the Ad Hoc Group of Term Lenders
listed in Appendix A to Dkt. No. 670*

HAHN & HESSEN LLP

By: /s/ Mark T. Power
Mark T. Power
Alison M. Ladd
488 Madison Avenue
New York, New York 10022
Telephone: (212) 478-7200
Email: mpower@hahnessen.com
Email: aladd@hahnessen.com

*Attorneys for Certain Term Loan Investor Defendants
identified on Exhibit 1 to Dkt. No. 788*

