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January 18, 2019

By Hand, ECF, and Email

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

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

Dear Judge Glenn:

We jointly submit this letter on behalf of our client, JPMorgan Chase Bank, N.A., the other members of Defendants Steering Committee, and plaintiff, the Motors Liquidation Company Avoidance Action Trust.

The Honorable Martin Glenn
January 18, 2019
Page 2

At oral argument on January 10, 2019, Your Honor requested that the parties submit a letter addressing whether Judge Gerber, at the time he entered the final order authorizing debtor-in-possession financing to the General Motors Corporation (the "Final DIP Order"), had been informed that the Term Lenders' lien was subject to challenge based on the 2008 filing of the UCC-3 termination statement.

The parties have each reviewed the docket in Case No. 09-50026, and have not found any filings or hearing transcripts referring to the UCC-3 issue before the Final DIP Order was entered on June 25, 2009.

The parties are available to answer any questions that the Court may have.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Harold S. Novikoff". The signature is stylized and cursive, with a large initial "H" and "N".

Harold S. Novikoff

cc: Counsel of Record (by ECF and email)