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By FedEx, ECF, and Email

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
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 write on behalf of plaintiff, the Motors Liquidation Company Avoidance Action Trust, with the concurrence of JPMorgan, the Defendants Steering Committee, and the Motors Liquidation Company GUC Trust.

Since we last reported to the Court on March 22, 2019 about the parties' settlement in principle, the parties have continued to work together on the draft settlement agreement. The parties have made substantial progress since our last update to the Court, and all counsel involved believe that we are now a matter of days away from being in a position to report to the Court that we have reached agreement on the definitive settlement agreement.

We greatly appreciate the Court's patience with the parties and propose to provide a further update to the Court on or before April 12, 2019.

We are available to answer any questions the Court may have.

Respectfully,

/s/ Eric B. Fisher
Eric B. Fisher

cc: Counsel of Record (by ECF and email)