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April 12, 2019

**By Federal Express, 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 (the "AAT"), with the concurrence of JPMorgan Chase Bank, N.A. ("JPMorgan"), the Defendants Steering Committee, and the Motors Liquidation Company GUC Trust (the "GUC Trust").

We are pleased to report to the Court that the final settlement agreement, resolving all claims and cross-claims asserted in this action, is now in the process of being signed by all necessary parties. In addition to signatures on behalf of the AAT, JPMorgan, Simpson Thacher & Bartlett LLP and the GUC Trust, the settlement agreement requires signatures on behalf of any extant Term Lender that is or was represented by the Defendants Steering Committee (except for Term Lenders that received in the aggregate no more than \$10 million) before the AAT can proceed with the filing of a motion seeking approval of the settlement agreement. We are advised that because of the number of authorizations and signatures required, the execution process could take approximately two weeks.

We propose to provide a further update to the Court or file the motion seeking approval of the settlement agreement on or before April 30, 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)