

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

|  |   |                         |
|--|---|-------------------------|
| In re:   | : | Chapter 11 Case         |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,  | : | Case No. 09-50026 (REG) |
| Debtors.   | : | (Jointly Administered)  |
| OFFICIAL COMMITTEE OF UNSECURED<br>CREDITORS OF MOTORS LIQUIDATION COMPANY<br>f/k/a GENERAL MOTORS CORPORATION,  | : | Adversary Proceeding    |
| Plaintiff,   | : | Case No. 09-00504 (REG) |
| vs.  | : |                         |
| JPMORGAN CHASE BANK, N.A., individually and as<br>Administrative Agent for Various lenders party to the Term<br>Loan Agreement described herein, <i>et al.</i> , | : |                         |
| Defendants.  | : |                         |

**ORDER REGARDING DISCOVERY AND SCHEDULING**

After considering the issue of a schedule for discovery in the above-captioned action at this Court's August 13, 2015 hearing,

**IT IS HEREBY ORDERED** as follows:

**1. Discovery Schedule:** The discovery schedule for this adversary proceeding shall be as follows:

Aug. 13, 2015      By this date, JPMCB to provide copies of all previously produced discovery (including documents and deposition transcripts) to the other defendants, subject to their compliance with ¶ 7(a) of the Protective Order

|                           |  |
|---------------------------|--|
| Aug. 13, 2015             | Fact discovery, including depositions and inspections, resumes in full, except no depositions are to be noticed until after September 30, 2015, <i>provided however</i> , that the entry of this Order is without prejudice to the right of any defendant not served as of August 13, 2015, to seek a reasonable adjournment or extension of time with respect to any scheduled depositions upon a showing that such adjournment is necessary. |
| Sept. 30, 2015            | Deadline for Plaintiff to complete service   |
| Nov. 16, 2015             | Deadline for Defendants to file cross-claims, if any   |
| Nov. 16, 2015             | Defendants' deadline to answer, move to dismiss, or otherwise respond to the amended complaint   |
| Jan. 20, 2016             | Plaintiff's deadline to respond to any motions to dismiss  |
| Feb. 15, 2016             | Defendants' deadline to file replies on any motions to dismiss   |
| Apr. 15, 2016             | Deadline for document discovery  |
| July 31, 2016             | Deadline for fact discovery (including depositions and plant inspections)  |
| Aug. 12, 2016             | Parties serve expert reports   |
| Sept. 14, 2016            | Parties serve rebuttal expert reports  |
| Oct. 31, 2016             | Expert depositions completed/Close of discovery  |
| Nov. 15, 2016             | Summary judgment motions or, if required, letter requests for dispositive motions, filed and served  |
| To be determined by Court | Pre-trial conference   |
| To be determined by Court | Trial dates  |

**2. Adjustments to Discovery Schedule:** Each party (whether served as of the date of this Order or not) reserves its rights to apply to the Court to alter any of the deadlines herein, and each party reserves its right to oppose any such application. With regard to the deadline for Defendants to file cross-claims (if any), any Defendant or Defendants may stipulate with any other Defendant or Defendants to extend that deadline to the extent applicable to them without the need for a court order.

**3. Jurisdiction:** This Order may be reviewed *ab initio* and modified by any successor bankruptcy judge having jurisdiction over this adversary proceeding.

**SO ORDERED:**

Dated: New York, New York  
August 17, 2015

*s/ Robert E. Gerber*  
Honorable Robert E. Gerber  
United States Bankruptcy Judge