

Barry N. Seidel
Eric B. Fisher
Evan J. Zucker
DICKSTEIN SHAPIRO LLP
1633 Broadway
New York, New York 10019-6708
Telephone: (212) 277-6500
Facsimile: (212) 277-6501

Jeffrey Rhodes (*admitted pro hac vice*)
DICKSTEIN SHAPIRO LLP
1825 Eye Street, NW
Washington, D.C. 20006
Telephone: (202) 420-3150

Attorneys for Plaintiff

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

-----X
In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (REG)
(Jointly Administered)

Debtors.

-----X
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 No. 09-00504 (REG)

against

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

Defendants.
-----X

**STIPULATION AND ORDER EXTENDING TIME TO
RESPOND TO FIRST AMENDED ADVERSARY COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the time by which Defendants, **DE-SEI Instl Inv TR-Hi Yld BD, DE-SEI Instl Mgd TR-Hi Yld BD, SEI Inst Mgd TR Core Fxd Inc, DE-SEI Institutional Investment Trust - High Yield Bond Fund, DE-SEI Institutional Managed Trust - High Yield Bond Fund, Delaware-SEI Institutional Investment Trust-High Yield Bond Fund, Delaware-SEI Institutional Managed Trust-High Yield Bond Fund, and SEI Institutional Managed Trusts Core Fixed Income** ("the SEI Defendants") must move, answer or otherwise respond to the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Docket No. 91] in the above-captioned adversary proceeding is hereby extended to and including November 30, 2015.

Dated: October 30, 2015

DICKSTEIN SHAPIRO LLP

/s/ Evan J. Zucker

Barry N. Seidel, Esq.
Eric B. Fisher, Esq.
Evan J. Zucker, Esq.
1633 Broadway
New York, New York
Tel: 212-277-6500
Fax: 212-277-6501

Attorneys for Plaintiff

Dated: October 30, 2015

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN, P.C.**

/s/ Denis C. Dice

Denis C. Dice, Esq.
Joel Wertman, Esq.
David R. Lane, Jr., Esq.
2000 Market Street, Suite 2300
Philadelphia, Pennsylvania 19103
T: (215) 575-2779
F: (215) 575-0856

Attorneys for Defendants, DE-SEI Instl Inv TR-Hi Yld BD, DE-SEI Instl Mgd TR-Hi Yld BD, SEI Inst Mgd TR Core Fxd Inc, DE-SEI Institutional Investment Trust - High Yield Bond Fund, DE-SEI Institutional Managed Trust - High Yield Bond Fund, Delaware-SEI Institutional Investment Trust-High Yield Bond Fund, Delaware-SEI Institutional

*Managed Trust-High Yield Bond Fund, and SEI
Institutional Managed Trusts Core Fixed Income*

SO ORDERED

Dated: New York, New York
November ____, 2015

United States Bankruptcy Judge