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Attorneys for Plaintiff

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

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In re:

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

Chapter 11

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

Debtors.

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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.

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**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, that the time by which **MacKay Shields Short Duration Alpha Fund** 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 20, 2015.

Dated: New York, New York
November 12, 2015

New York, New York
November 13, 2015

DICKSTEIN SHAPIRO LLP

DAVIS POLK & WARDWELL LLP

/s/ Evan J. Zucker

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*Attorneys for Global Funds Trust
Company, solely in its capacity as the
former Trustee of MacKay Short Duration
Alpha Fund (incorrectly named as
“MacKay Shields Short Duration Alpha
Fund”)*

SO ORDERED

Dated: New York, New York
November ____, 2015

United States Bankruptcy Judge