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Hearing Date and Time: January 21,  
2016 at 9:45 a.m. EST

Objection Deadline: January 14,  
2016 at 4:00 p.m. EST

John W. Spiegel (admitted *pro hac vice*)  
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[additional counsel listed on signature page]

*Attorneys for Nonparties Ares Management LLC, Eaton Vance Management, Oaktree Capital Management, L.P., Sankaty Advisors, LLC, and Western Asset Management Co.; and for Term Loan Lenders as listed in Appendix A to the Answer*

**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)
MOTORS LIQUIDATION COMPANY	)	Adversary Proceeding
AVOIDANCE ACTION TRUST, by and through	)	Case No. 09-00504 (REG)
Wilmington Trust Company, solely in its capacity as	)	
Trust Administrator and Trustee,	)	
Plaintiff,	)	
vs.	)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	)	
Defendants.	)	

**NOTICE OF HEARING ON NONPARTIES' MOTION TO QUASH  
PROCESS AND SERVICE OF PROCESS**

**PLEASE TAKE NOTICE** that a hearing to consider the relief requested in the Motion to Quash Process and Service of Process, filed by Nonparties Ares Management LLC, Eaton Vance Management, Oaktree Capital Management, L.P., Sankaty Advisors, LLC, and Western Asset Management Co., by special appearance through their attorneys, shall be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 523, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court"), on **January 21, 2016 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to this Motion must be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), with a hard copy delivered directly to Chambers, in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on the Nonparties' attorneys, Jones Day, 555 South Flower Street, Fiftieth Floor, Los Angeles, California, 90071 (Attn: Bruce Bennett, Esq.), and Munger, Tolles & Olson LLP, 355 South Grand Avenue, 35th Floor, Los Angeles, California, 90071 (Attn: John W. Spiegel), so as to be received no later than **January 14, 2015 at 4:00 p.m. EST** (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that that if no objections are timely filed and served with respect to the Motion, the Nonparties may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be signed and entered with no further notice or opportunity to be heard.

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vs.	)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	)	
Defendants.	)	

**NONPARTIES' MOTION TO QUASH  
PROCESS AND SERVICE OF PROCESS**

Nonparties Ares Management LLC, Eaton Vance Management, Oaktree Capital Management, L.P., Sankaty Advisors, LLC, and Western Asset Management Co., by special appearance through their attorneys, hereby move to quash process and service of process under Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5) and Federal Rule of Bankruptcy Procedure 7012(b). The grounds in support of this motion are set forth in the moving Nonparties' Memorandum in Support of Nonparties' Motion to Quash Process and Service of Process, which they are filing simultaneously with this motion.

Dated: November 16, 2015

Respectfully submitted,

/s/ Bruce S. Bennett

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/s/ John W. Spiegel

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Management, L.P., Sankaty Advisors,  
LLC, and Western Asset Management  
Company; and for Term Loan Lenders  
as listed in Appendix A to the Answer*

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Plaintiff,	)	
vs.	)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	)	
Defendants.	)	
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**[PROPOSED] ORDER GRANTING NONPARTIES’ MOTION TO QUASH  
PROCESS AND SERVICE OF PROCESS**

Upon the motion of Nonparties Ares Management LLC, Eaton Vance Management, Oaktree Capital Management, L.P., Sankaty Advisors, LLC, and Western Asset Management Co. (the “Nonparties”), it is hereby

ORDERED that service and process of service as to the Nonparties be, and hereby is, quashed.

Dated: \_\_\_\_\_, 2015  
New York, New York

SO ORDERED

\_\_\_\_\_  
HON. ROBERT E. GERBER