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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 17, 2015

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