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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**

WHEREAS, **Employees' Retirement System of the City of Montgomery** (“**Defendant**”), a defendant in the above-captioned adversary proceeding has requested additional time to 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] (the “**Amended Complaint**”); and

WHEREAS, the Defendant plans to answer the Amended Complaint; it is therefore

STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the time by which Defendant must answer the Amended Complaint is hereby extended to and including November 30, 2015.

Dated: New York, New York
November 11, 2015

Boston, Massachusetts
November 11, 2015

DICKSTEIN SHAPIRO LLP

SHAPIRO HABER & URMY LLP

/s/ Evan J. Zucker

/s/ Edward F. Haber

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*Attorneys for Employees' Retirement
System of the City of Montgomery*

SO ORDERED

Dated: New York, New York
November 17, 2015

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