

**Hearing Date and Time: To be determined by the Court**  
Objections Due (per Scheduling Order): January 20, 2016  
Reply Due (per Scheduling Order): February 15, 2016

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*Attorneys for Twin Lake Total Return Partners LP  
f/k/a Talon Total Return Partners LP and  
Twin Lake Total Return Partners QP LP  
f/k/a Talon Total Return QP Partners LP*

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,  
  
Debtors.

MOTORS LIQUIDATION COMPANY  
AVOIDANCE ACTION TRUST, by and  
through the Wilmington Trust Company, solely  
in its capacity as Trust Administrator and  
Trustee,

Plaintiff,

-against-

JPMORGAN CHASE BANK N.A.,  
individually and as Administrative Agent for  
Various lenders party to the Term Loan  
Agreement described herein, *et al.*,

Defendants.

Chapter 11 Case

Case No. 09-50026 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

**NOTICE OF JOINDER IN JOINT MOTION TO DISMISS**

PLEASE TAKE NOTICE that a hearing to consider the relief requested in the *Joinder of Twin Lake Total Return Partners LP f/k/a Talon Total Return Partners LP and Twin Lake Total Return Partners QP LP f/k/a Talon Total Return QP Partners LP in Joint Motion to Dismiss* (the “**Joinder**”) filed by Twin Lake Total Return Partners LP f/k/a Talon Total Return Partners LP and Twin Lake Total Return Partners QP LP f/k/a Talon Total Return QP Partners LP (collectively, “**Twin Lake**”) shall be held before the Honorable United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom to be determined, One Bowling Green, New York, New York 10004 (the “**Court**”) on a date and at a time to be determined by the Court.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Joinder and the relief requested therein shall be made in writing, shall state with particularity the grounds therefor, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the 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 Court’s case 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 Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 on Hahn & Hessen LLP, attorneys for Twin Lake, 488 Madison Avenue, New York, New York 10022 (Attn: Mark T. Power), so as to be received no later than January 20, 2016.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Joinder may  
be granted without a hearing if no objection is timely filed and served as set forth above.

Dated: New York, New York  
November 24, 2015

Respectfully submitted,

HAHN & HESSEN LLP

By: /s/ Mark T. Power  
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Talon Total Return Partners LP and Twin Lake Total Return  
Partners QP LP f/k/a Talon Total Return QP Partners LP*

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Twin Lake Total Return Partners QP LP  
f/k/a Talon Total Return QP Partners LP*

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MOTORS LIQUIDATION COMPANY  
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JPMORGAN CHASE BANK N.A.,  
individually and as Administrative Agent for  
Various lenders party to the Term Loan  
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Defendants.

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Case No. 09-50026 (REG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (REG)

Related Docket No. 226

**JOINDER OF TWIN LAKE TOTAL RETURN PARTNERS LP F/K/A  
TALON TOTAL RETURN PARTNERS LP AND TWIN LAKE TOTAL  
RETURN PARTNERS QP LP F/K/A TALON TOTAL RETURN QP  
PARTNERS LP IN JOINT MOTION TO DISMISS**

Twin Lake Total Return Partners LP f/k/a Talon Total Return Partners LP and  
Twin Lake Total Return Partners QP LP f/k/a Talon Total Return QP Partners LP  
(collectively, “**Twin Lake**”) hereby join in the *Certain Term Loan Investor Defendants’ Joint  
Motion to Dismiss Plaintiff’s Amended Complaint* (ECF No. 226) and accompanying  
*Memorandum of Law* (ECF No. 226-1), and adopt the same as if set forth fully herein.

WHEREFORE, Twin Lake respectfully requests that the Court<sup>1</sup> grant the Joint  
Motion and dismiss the Amended Complaint as against Twin Lake with prejudice, and that  
the Court grant such other and further relief as may be just and proper.

Dated: New York, New York  
November 24, 2015

Respectfully submitted,

HAHN & HESSEN LLP

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Talon Total Return Partners LP and Twin Lake Total Return  
Partners QP LP f/k/a Talon Total Return QP Partners LP*

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the *Memorandum of Law*.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of November, 2015, a copy of the foregoing Joinder was served via the Court's CM/ECF system on all subscribed parties.

/s/ Sandra Y. Thompson  
Sandra Y. Thompson