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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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**CERTIFICATE OF NO OBJECTION TO
MOTION OF MOTORS LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST FOR AN ORDER REMOVING THE
CONFIDENTIALITY DESIGNATION FROM CERTAIN DOCUMENTS
AND UNSEALING EXHIBITS 3 AND 4 TO THE AMENDED COMPLAINT**

On October 7, 2015, the Motors Liquidation Company Avoidance Action Trust (the “**Trust**”), by and through its undersigned attorneys, filed the *Motion of Motors Liquidation Company Avoidance Trust For An Order Removing The Confidentiality Designation From Certain Documents And Unsealing Exhibits 3 And 4 To The Amended Complaint* [Docket No. 165] (the “**Motion**”).

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, the undersigned certifies that, as of the date hereof, which is more than forty-eight (48) hours after the objection deadline, Dickstein Shapiro LLP (“**Dickstein**”) has received no objection or otherwise responsive pleading to the Motion.

The undersigned further certifies that, on October 7, 2015, Dickstein caused the Motion and Notice of Hearing on the Motion (the “**Notice of Hearing**”) to be served on all defendants in the above-captioned adversary proceeding. See October 8, 2015 Affidavit of Service [Docket No. 170].

Pursuant to the Notice of Hearing, responses to the Motion were to be filed with the Court and served on the Trust no later than October 29, 2015 at 4:00 p.m. (prevailing Eastern time) (the “**Response Deadline**”). The notice specifically stated that if no responses were received by the Response Deadline, then the relief requested in the Motion could be granted without further notice or hearing.

The Trust on October 29, 2015 agreed to extend the Response Deadline with respect to certain defendants until October 30, 2015.

The undersigned further certifies that, as of the date hereof, based upon review of the Court’s docket in this case, no objection or other responsive pleading to the Motion has been filed.

WHEREFORE, the Trust respectfully requests that, at the earliest convenience of the Court, an order be entered granting the Motion.

Dated: New York, New York
December 2, 2015

DICKSTEIN SHAPIRO LLP

By: /s/ Eric B. Fisher
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