

**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)
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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,	:	Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (REG)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various lenders party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

**STIPULATION AND ORDER REGARDING EXTENSION OF THE
DEADLINE FOR JPMORGAN CHASE BANK, N.A. TO ANSWER OR
OTHERWISE RESPOND TO CROSS-CLAIMS**

WHEREAS, on November 16, 2015, certain Defendants (the “Cross-Claimants”) filed cross-claims against JPMorgan Chase Bank, N.A. (“JPMCB”) at docket nos. 222 and 241 (the “Cross-Claims”);

WHEREAS Rule 7012(a) of the Federal Rules of Bankruptcy Procedure provides that “[a] party served with a pleading stating a cross-claim shall serve an answer thereto within 21 days after service”;

WHEREAS JPMCB and the Cross-Claimants, as well as other parties in this action, are conferring regarding a schedule for further filings in this action, including in relation to the Cross-Claims;

IT IS HEREBY STIPULATED AND ORDERED that the time by which JPMCB must move, answer or otherwise respond to the Cross-Claims is hereby extended to January 20, 2016.

STIPULATED AND AGREED:

Dated: New York, New York By: /s/ Harold S. Novikoff
Dec. 4, 2015

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*Attorneys for Term Loan Lenders listed in Appendix A to
Dkt. No. 241*

SO ORDERED:

Dated: December 7, 2015
New York, New York

s/ Robert E. Gerber
HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE