

DAVIS POLK & WARDWELL LLP

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Funding LLC, Loan Funding XI LLC*

**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	:	Adversary Proceeding
AVOIDANCE ACTION TRUST, by and through the	:	Case No. 09-00504 (REG)
Wilmington Trust Company, solely in its capacity as	:	
Trust Administrator and Trustee,	:	
Plaintiff,	:	
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.	:	

RULE 7.1 STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Rule 7007.1 of the
Federal Rules of Bankruptcy Procedure and S.D.N.Y. Local Bankruptcy Rule 7007.1-1,
the undersigned counsel certifies as follows:

i. Citibank, N.A., is an indirect wholly-owned subsidiary of Citigroup Inc., a publicly held company. No other publicly held company has an ownership interest of 10% or more in Citibank, N.A.

ii. Citigroup Financial Products Inc. is wholly owned by Citigroup Global Markets Holdings, Inc., which in turn is wholly owned by Citigroup Inc. Citigroup Inc., a publicly-held corporation, therefore indirectly owns 10 percent or more of the stock of Citigroup Financial Products, Inc.

iii. Bismarck CBNA Loan Funding LLC is a limited liability company. Its sole member is Citibank, N.A., an indirect wholly-owned subsidiary of Citigroup Inc.

iv. Loan Funding XI LLC is a limited liability company. Its sole member is Citibank, N.A., an indirect wholly-owned subsidiary of Citigroup Inc.

Dated: December 16, 2015
New York, New York

Respectfully submitted,

/s/ Elliot Moskowitz

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and Loan Funding XI LLC*