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Attorneys for the Delaware Investments Funds

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK	v	
In re:  MOTORS LIQUIDATION COMPANY, et al.,  Debtors	: : : : : : : : : : : : : : : : : : : :	Chapter 11 Case No. 09-50026 (REG) (Jointly Administered)
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 No. 09-00504 (REG)
-against-	:	
JPMORGAN CHASE BANK, N.A. et al.,	:	
Defendants.	:	
	<b>V</b>	

## **RULE 7007.1 DISCLOSURE**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, Delaware Delchester Fund, a series of Delaware Group Income Funds (reorganized into Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds), Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds (incorrectly identified in the First

Amended Complaint ("FAC") as Delaware Diversified Income Fund), Delaware Enhanced Global Dividend and Income Fund, Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds (incorrectly identified in the FAC as Delaware Extended Duration Bond Fund), Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V (incorrectly identified in the FAC as Delaware Group Equity V Inc. Dividend Income Fund), Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund (incorrectly identified in the FAC as Delaware Group Government Fund Core Plus Fund), Delaware Corporate Bond Fund, a series of Delaware Group Income Funds (incorrectly identified in the FAC as Delaware Group Inc. Fund Inc. Corporate Bond Fund), Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds (incorrectly identified in the FAC as Delaware Group Income Funds – Delaware High Yield Opportunities Fund), Delaware Investments Dividend and Income Fund, Inc., Delaware Investments Global Dividend and Income Fund, Inc. (reorganized into Delaware Enhanced Global Dividend and Income Fund) (incorrectly identified in the FAC as Delaware Investments Global Dividend & Income Fund), Optimum Fixed Income Fund, a series of Optimum Fund Trust (incorrectly identified in the FAC as Delaware Optimum Fixed Income Fund), The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust (incorrectly identified in the FAC as Delaware Pooled Trust – Core Plus Fixed Income Portfolio), The High-Yield Bond Portfolio, a series of Delaware Pooled Trust (incorrectly identified in the FAC as Delaware Pooled Trust – High Yield Bond Portfolio), Delaware VIP Diversified Income Series, a series of Delaware VIP Trust (incorrectly identified in the FAC as Delaware VIP Trust Diversified Income Series), Delaware VIP High-Yield Series, a series of Delaware VIP Trust (incorrectly identified in the FAC as Delaware VIP Trust High

Yield Series) (collectively, the "<u>Delaware Investments Funds</u>"), by and through their undersigned attorneys, certify, to the best of their knowledge, the following:

- 1. MLPF&S, National Financial Services LLC, First Clearing LLC, Morgan Stanley Smith Barney, LPL Financial, UBS WM USA, and Hartford Life Insurance Co. each has a 10% or more ownership interest in Delaware Diversified Income Fund, a series of Delaware Group Advisor Funds.
- 2. Massachusetts Mutual Life Insurance Company, National Financial Services LLC, First Clearing LLC, MLPF&S, Pershing LLC, Raymond James Omnibus for Mutual Funds, Charles Schwab & Co. Inc., Hartford Life Insurance Company, Voya Retirement Insurance and Annuity Company, and DCGT as Trustee Custodian for the benefit of PLIC Various Retirement Plans Omnibus each has a 10% or more ownership interest in Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds.
- 3. Charles Schwab & Co. Inc., National Financial Services LLC, First Clearing LLC, MLPF&S, Morgan Stanley Smith Barney, UBS WM USA, and DCGT as Trustee Custodian for the benefit of PLIC Various Retirement Plans Omnibus each has a 10% or more ownership interest in Delaware Corporate Bond Fund, a series of Delaware Group Income Funds.
- 4. National Financial Services LLC, First Clearing LLC, LPL Financial, Morgan Stanley Smith Barney, Voya Retirement Insurance and Annuity Company, and DCGT as Trustee Custodian for the benefit of PLIC Various Retirement Plans Omnibus each has a 10% or more ownership interest Delaware High Yield Opportunities Fund, a series of Delaware Group Income Funds.

- LPL Financial owns a 10% or more ownership interest in Optimum Fixed Income
   Fund, a series of Optimum Fund Trust.
- 6. Northern California Carpenters Regional Council Labor Organization Assets and The Northern Trust Co. Trustee for the benefit of Georgia Gulf each has a 10% or more ownership interest in The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust.
- 7. Mac & Co. Public Pension Mutual Funds Operations and Northern Trust for the benefit of Aurora Operating each has a 10% or more ownership interest in The High Yield Bond Portfolio, a series of Delaware Pooled Trust.
- 8. Lincoln Life and TIAA Cref Life Separate Life Insurance Company each has a 10% or more ownership interest in Delaware VIP Trust Diversified Income Series.
- 9. Lincoln Life has a 10% or more ownership interest in each of Delaware VIP Diversified Income Series, a series of Delaware VIP Trust, and Delaware VIP High-Yield Series, a series of Delaware VIP Trust.
- 10. National Financial Services, LLC, First Clearing LLC, MLPF&S, Morgan Stanley Smith Barney, UBS WM USA and Reliance Trust Company each has a 10% or more ownership interest in Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V.
- 11. Charles Schwab & Co. Inc., MLPF&S, Morgan Stanley Smith Barney, Wells Fargo Bank NA, National Financial Services LLC, Raymond James Omnibus for Mutual Funds and Lincoln Retirement Services Co. each has a 10% or more ownership interest in Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund.
- 12. Cede & Co. has a 10% or more ownership interest in each of Delaware Enhanced Global Dividend and Income Fund, and Delaware Investments Dividend and Income Fund, Inc.

Dated: New York, New York January 20, 2016

Respectfully submitted,

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

By: /s/ Andrew K. Glenn Andrew K. Glenn (aglenn@kasowitz.com) 1633 Broadway New York, New York 10019 Tel: (212) 506-1700

Attorneys for the Delaware Investments Funds

[\*complete list of represented Defendants listed in Appendix A]

## APPENDIX A

Blackrock Corporate High Yield Fund, Inc.

Blackrock Corporate High Yield Fund III, Inc.

Blackrock Corporate High Yield Fund V, Inc.,

Blackrock Corporate High Yield Fund VI, Inc.

Blackrock Debt Strategies Fund, Inc.

Blackrock Diversified Income Strategies Fund, Inc.

Blackrock Floating Rate Income Strategies Fund Inc.

Blackrock Funds High Yield Bond Portfolio

Blackrock Funds II, High Yield Bond Portfolio

Blackrock Global Investment Series: Income Strategies Portfolio

Blackrock GSAM Goldman Core Plus Fixed Income Fund

Blackrock High Incm Fund of Blackrock Bond Fund Inc.

Blackrock High Income Shares

Blackrock High Yield Trust

Blackrock Managed Account Series High Income Portfolio

Blackrock MET Investor Series TR High Yield Portfolio

Blackrock Multi Strategy Sub-Trust C

Blackrock Senior High Income Fund, Inc.

Blackrock Senior Income Series II

Blackrock Senior Income Series IV

Blackrock Strategic Bond Trust

R3 Capital Partners Master LP

The Galaxite Master Unit Trust

BlackRock Corporate High Yield Fund IV, Inc.

Corporate High Yield Fund V, Inc.

BlackRock Diversified Income Strategies Portfolio, Inc.

BlackRock High Yield Portfolio of BlackRock Series Fund, Inc.

BlackRock Funds II, High Yield Bond Portfolio

BGIS Income Strategies Portfolio

BlackRock High Income Fund

Managed Account Series: High Income Portfolio

R3 Capital Partners Master - Cayman Trading Portfolio

Galaxite - Citi Prime Brokerage Account

BlackRock Multi-Strategy Fixed Income

BlackRock Senior Income Fund Inc.

Fixed Income Portable Alpha Fund - Credit

California State Teachers' Retirement System

Missouri State Employees Retirement System

Fortress Credit Investments I Ltd.

Fortress Credit Investments II Ltd.

Drawbridge Special Opportunities Fund LP

Drawbridge Special Opportunities Fund Ltd.

Taconic Capital Partners 1.5 LP

Taconic Market Dislocation Fund II LP

Taconic Market Dislocation Master Fund II LP

Taconic Opportunity Fund LP

Solus Core Opportunities Master Fund Ltd.

Sola Ltd.

Ultra Master Ltd

Mason Capital, L.P.

Mason Capital, Ltd.

Thrivent Financial for Lutherans

Thrivent High Yield Fund

Thrivent High Yield Portfolio

Thrivent Income Fund

Thrivent Series Fund, Inc. - Income Portfolio

Delaware LVIP Delaware Bond Fund

L3-Lincoln Variable Insurance Products Trust Managed Fund

Lincoln National Life Insurance Company Separate Account 12

Lincoln National Life WSA20

LVIP Delaware Bond Fund, a series of Lincoln Variable Insurance Products Trust

LVIP Delaware Foundation® Conservative Allocation Fund, a series of Lincoln Variable

Insurance Products Trust

The Lincoln National Life Insurance Company Separate Account 12

The Lincoln National Life Insurance Company Separate Account 20

Freescale Semiconductor, Inc.

Freescale Semiconductor Inc., Retirement Savings

PIMCO 1464-Freescale Semiconductor Inc

PIMCO 1641-Sierra Pacific Resources

PIMCO Fairway Loan Funding Company

PIMCO2244 - Virginia Retirement System

PIMCO2496-FLTG RT INC FD

PIMCO2497-FLTG RT STRT FD

PIMCO2603 - Red River HYPI LP

PIMCO3813 - PIMCO Cayman Bank Loan Fund

PIMCO400-Stocks Plus Sub Fund B LLC

PIMCO6819 Portola CLO LTD.

PIMCO700-FD TOT RTN FD

PIMCO706-Private High Yield Portfolio

Mayport CLO Ltd.

Global Investment Grade Credit Fund

Portola CLO Ltd.

Golden Knight II CLO, Ltd.

NV Energy, Inc. Master Defined Benefit Trust

Fairway Loan Funding Company - CDO

Virginia Retirement System

PIMCO Income Strategy Fund (PFL)

PIMCO Income Strategy Fund II (PFN)

Red River HYPi, L.P.

PIMCO Cayman Bank Loan Fund (USD)

PIMCO StockPLUS LP Fund B

Portola CLO. Ltd.

PIMCO Total Return Fund

PAPS High Yield Portfolio

Mayport CLO, Ltd.

GIS Global Investment Grade Credit Fund

Lord Abbett Inv Trst-LA HI YLD

Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund

Lord Abbett & Co - Teachers Re

Lord Abbett Investment Trust - Lord Abbett High Yield Fund

Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund

Lord Abbett managed account for Teachers' Retirement System of Oklahoma

MacKay 8067 - Fire & Police Employee Retirement System of the City of Baltimore

Fire & Police Employees' Retirement System of the City of Baltimore

Putnam 29x-Funds Trust Floating Rate Income Fund

Delaware Delchester Fund

Delaware Diversified Income Fund

Delaware Diversified Income Trust

Delaware Enhanced Global Dividend & Income Fund

Delaware Extended Duration Bond Fund

Delaware Group Equity V Inc. Dividend Income Fund

Delaware Group Government Fund Core Plus Fund

Delaware Group Inc. Fund Inc. Corporate Bond Fund

Delaware Group Income Funds - Delaware High Yield Opportunities Fund

Delaware Investments Dividend & Income Fund Inc.

Delaware Investments Global Dividend & Income Fund

Delaware Optimum Fixed Income Fund

Delaware Pooled Trust - Core Plus Fixed Income Portfolio

Delaware Pooled Trust - High Yield Bond Portfolio

Delaware VIP Trust Diversified Income Series

Delaware VIP Trust High Yield Series

Delaware Delchester Fund, a series of Delaware Group Income Funds

Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds

Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds

Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V

Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund

Delaware Corporate Bond Fund, a series of Delaware Group Income Funds

Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds

Delaware Investments Global Dividend and Income Fund, Inc.

Optimum Fixed Income Fund, a series of Optimum Fund Trust

The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust

The High-Yield Bond Portfolio, a series of Delaware Pooled Trust

Delaware VIP Diversified Income Series, a series of Delaware VIP Trust

Delaware VIP High-Yield Series, a series of Delaware VIP Trust

MacKay New York Life Insurance Company (Guaranteed Products)

New York Life Insurance Company Guaranteed Products

New York Life Insurance Company (Guaranteed Products)

New York Life Insurance GP - Portable Alpha

MacKay Shields Core Plus Alpha Fund Ltd.

Arnhold-Houston Police Officers' Pension System

MacKay-Houston Police Officers Pension System

Plumbers & Pipefitters National Pension Fund

Russell Strategic Bond Fund

Logan Circle - Russell Inst Funds LLC - Russell Core Bond

Logan Circle - Russell Investment Company PLC

Logan Circle - Russell Multi-Managed Bond Fund

Logan Circle - Russell Strategic Bond Fund

Russell Investment Company Russell Strategic Bond Fund

Russell Inst Funds LLC Russell Core Bond Fund

Russell Investment Company PLC The Global Strategic Yield Fund

Russell Investment Company PLC The Global Strategic Yield Fund on behalf of DDJ - Multi-

Style, Multi-Manager Funds PLC – Global Strategic Fund

Russell Trust Company Russell Multi-Managed Bond Fund

Russell Investment Company Russell Strategic Bond Fund

Russell Inst Funds LLC - Russell Core Bond Fund

WAMCO 3073 - John Hancock Trust Floating Rate Income Trust,

WAMCO 3074 - John Hancock Fund II Floating Rate Income Fund

John Hancock Trust Floating Rate Income Trust

John Hancock II - Floating Rate Income Fund

John Hancock Variable Insurance Trust - Floating Rate Income Trust

John Hancock Funds II - Floating Rate Income Fund

John Hancock Variable Insurance Trust - U.S. High Yield Bond Trust

John Hancock Funds II - U.S. High Yield Bond Fund

Wells Capital Management 16959700

JHVIT U.S. High Yield Bond Trust

Wells Capital Management 16959701

JHF II U.S. High Yield Bond Fund

Neuberger Berman High Yield Strategies Fund Inc. (f/k/a Lehman Brothers First Trust Income Opportunity Fund)

Neuberger Berman High Income Bond Fund (f/k/a Lehman Brothers High Income Bond Fund)

Guggenheim Portfolio Company X, LLC

Security Investors - Security Income Fund - High Yield Series

Guggenheim High Yield Fund

Commonwealth Virginia and the Virginia Retirement System

WAMCO 3023 - Virginia Retirement Systems Bank Loan Portfolio

WAMCO 176 - Virginia Supplemental Retirement System

Cap Fund, L.P.

BBT Master Fund, L.P.

BBT Fund, L.P.

SRI Fund, L.P.

Wells Capital Management 16017000

North Dakota State Investment Board