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Attorney for Term Loan Lenders for certain purposes*

Hearing Date and Time: TBD

Objection Deadline: March 4, 2016

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[*additional counsel listed on signature page*]

* The Term Loan Lenders are listed in Appendix A to the Answer [Dkt. 241].

**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 (MG)
Debtors.)	(Jointly Administered)
MOTORS LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee,)	Adversary Proceeding
Plaintiff,)	Case No. 09-00504 (MG)
vs.)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	

NOTICE OF HEARING ON THE TERM LOAN LENDERS’
MOTION FOR JUDGMENT ON THE PLEADINGS

PLEASE TAKE NOTICE that a hearing to consider the relief requested in the Motion for Judgment on the Pleadings, filed by the Term Loan Lenders this 26th day of January 2016, shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 501, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **a date to be determined by the Bankruptcy Court.**

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Motion must be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s 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 Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on the Term Loan Lenders’ attorneys, Jones Day, 555 South Flower Street, Fiftieth Floor, Los Angeles, California, 90071 (Attn: Bruce Bennett, Esq.), and Munger, Tolles & Olson LLP, 355 South Grand Avenue, 35th Floor, Los Angeles, California, 90071 (Attn: John W. Spiegel), so as to be received no later than **March 4, 2016** (the “Objection Deadline”), as outlined in the Stipulated Scheduling Order (Dkt. No. 341).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, the Term Loan Lenders may, on or after the Objection Deadline,

submit to the Bankruptcy Court an order substantially in the form of the proposed order submitted with the Motion, which order may be signed and entered with no further notice or opportunity to be heard.

Dated: January 26, 2016

Respectfully submitted,

/s/ Bruce S. Bennett

Bruce S. Bennett

Erin L. Burke

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¹ Northern Trust Investments, Inc., as Named Fiduciary to the Central States, Southeast, and Southwest Areas Pension Fund, is represented for all purposes by Munger, Tolles & Olson LLP and not by Jones Day.