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Company

[additional counsel and represented parties listed on signature page]

**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)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as)	Case No. 09-00504 (MG)
Trust Administrator and Trustee,)	
Plaintiff,)	
vs.)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	

**NOTICE OF WITHDRAWAL OF MOTIONS
TO QUASH PROCESS AND SERVICE OF PROCESS AS MOOT**

On November 16, 2015, nonparties Ares Management LLC, Eaton Vance Management, Oaktree Capital Management, L.P., Sankaty Advisors, LLP, and Western Asset Management Company (collectively, with First Trust Advisors L.P., the “Movants”) filed the *Nonparties’ Motion to Quash Process and Service of Process* [ECF No. 239], seeking to quash process and service of process under Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5), and Federal Rule of Bankruptcy Procedure 7012(b). Nonparty First Trust Advisors L.P. filed a joinder on November 23, 2015 [ECF No. 270] (collectively, with ECF No. 239, the “Motions”). On the basis of the *Stipulation Regarding Withdrawal of Motions to Quash Process and Service of Process as Moot*, attached hereto as Exhibit A, the Movants hereby withdraw the Motions as moot and request that they be struck from the Court’s calendar.

Dated: February 25, 2016

Respectfully submitted,

/s/ Erin L. Burke

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*Attorneys for the Movants and the Term Loan
Lenders as listed in Appendix A to the Answer
[Dkt. No. 241]*

EXHIBIT A

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MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,)	Case No. 09-50026 (MG)
Debtors.)	(Jointly Administered)
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MOTORS LIQUIDATION COMPANY)	
AVOIDANCE ACTION TRUST, by and through)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as)	
Trust Administrator and Trustee,)	Case No. 09-00504 (MG)
Plaintiff,)	
vs.)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,)	
Defendants.)	
_____)	

**STIPULATION REGARDING WITHDRAWAL OF
MOTIONS TO QUASH PROCESS AND SERVICE OF PROCESS AS MOOT**

WHEREAS, on November 16, 2015, nonparties Ares Management LLC, Eaton Vance Management, Oaktree Capital Management, L.P., Sankaty Advisors, LLP, and Western Asset Management Company (collectively, with First Trust Advisors L.P., the “Movants”) filed the *Nonparties’ Motion to Quash Process and Service of Process* [ECF No. 239], seeking to quash process and service of process under Federal Rules of Civil Procedure 12(b)(4) and 12(b)(5), and Federal Rule of Bankruptcy Procedure 7012(b).

WHEREAS, nonparty First Trust Advisors L.P. filed a joinder on November 23, 2015 [ECF No. 270] (collectively, with ECF No. 239, the “Motions”).

WHEREAS, the Movants are all nonparties to the above-captioned adversary proceeding and are alleged to have received service of a summons and complaint addressed to certain named defendants that are entities with whom the Movants were formerly affiliated but which, Movants assert, have ceased to exist.

WHEREAS, in the Motions, the Movants asked the Court to quash as insufficient the complaints and summons that the Movants received, and their service upon the Movants, in order to confirm that the Movants were not required to do anything further in this lawsuit.

WHEREAS, by letter dated February 17, 2016, the Motors Liquidation Company Avoidance Action Trust (the “Plaintiff”) confirmed that it will not contend that the Movants have been served with the summons and complaint, and withdrew such service as to each of the Movants.

IT IS HEREBY STIPULATED as follows:

1. Plaintiff acknowledges that the Movants have not been served with the summons or complaint in the above-captioned adversary proceeding.

2. The Movants withdraw the Motions as moot and request that they be struck from the Court's calendar.

STIPULATED AND AGREED:

Dated: February 25, 2016

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Answer [Dkt. No. 241]*