

Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank, N.A., et al (No. 09-00504-MG)

Dear Ms. Anderson:

The undersigned are counsel to the four largest term lender defendant groups in the above-captioned adversary proceeding (“Movants”). Each group has moved to dismiss or for judgment on the pleadings, in filings docketed at Nos. 226, 262, 377, and 390. A number of other defendants have joined in one or more of these motions. *See* Nos. 237, 275, 276, 281, 384, 287, 398, 293, 380, 383, 388, 426, and 443. On March 4, 2016, Plaintiff filed an omnibus opposition brief of sixty pages in response to Movants’ motions. This Court previously approved a request on February 29, 2016 by the undersigned to file reply briefs of up to twenty pages for each of the four Movants, for a total of 80 pages. These briefs are due March 30, 2016.

Many of the Motions shared common issues and, in the interests of not burdening the Court with duplicative arguments on those issues, Movants respectfully request the Court’s permission to file one omnibus reply brief addressing common issues, along with two shorter briefs addressing issues that are particular to certain Movants, not to exceed a total of 60 pages. Counsel for Plaintiff, copied on this email, has informed us that Plaintiff does not object to this proposal.

We thank the Court for its attention to this request.

Respectfully,

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MEMORANDUM ENDORSED.
REQUEST GRANTED.
IT IS SO ORDERED.
DATED: 3/29/16

/s/Martin Glenn
UNITED STATES BANKRUPTCY JUDGE