

Hearing Date and Time: April 18, 2016 at 10:00 A.M.
Objection Filed by Plaintiff: March 4, 2016
Reply Due: March 30, 2016

SCHUBERT JONCKHEER & KOLBE LLP

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*Attorney for City of Oakland Police
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,

Debtors.

MOTORS LIQUIDATION COMPANY
AVOIDANCE ACTION TRUST, by and through
the Wilmington Trust Company, solely in its
capacity as Trust Administrator and Trustee,

Plaintiff,

vs.

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

Adversary Proceeding

Case No. 09-00504 (MG)

**JOINDER OF CITY OF OAKLAND POLICE & FIRE RETIREMENT SYSTEM
IN PENDING RULE 12 MOTIONS**

The City of Oakland Police and Fire Retirement System (“PFRS”) hereby joins in, and adopts the same as if set forth fully herein, the following motions:

- (i) Certain Term Loan Investor Defendants' Joint Motion to Dismiss Plaintiff's Amended Complaint (Dkt. No. 226) and accompanying Memorandum of Law (Dkt. No. 226-1);
- (ii) Motion of Ad Hoc Group of Term Lenders (1) to Vacate Certain Prior Orders of the Court; and (2) to Dismiss the Adversary Proceeding (Dkt. No. 262);
- (iii) Motion of Term Loan Lenders for Judgment on the Pleadings (Dkt. No. 377); and
- (iv) Memorandum of Law in Support of the Moving Term Loan Lenders' Motion for Judgment on the Pleadings (Dkt. No. 390).

WHEREFORE, PFRS respectfully requests that the Court grant the pending Rule 12 Motions and dismiss the Amended Complaint as against PFRS with prejudice, and that the Court grant such other and further relief as may be just and proper.

Dated: March 30, 2016

Respectfully submitted,

/s/ Noah M. Schubert
Noah M. Schubert
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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2016, a copy of the foregoing Joinder was served via the Court's CM/ECF system on all subscribed parties.

/s/ Noah M. Schubert
Noah M. Schubert