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*Attorneys for Defendants Virtus Multi Sector Fixed  
Income Fund, (ii) Virtus Multisector Short Term  
Bond Fund, (iii) Virtus Senior Floating Rate Fund,  
(iv) Phoenix Edge Series Fund Phoenix Multi  
Sector Short Term Bond Series, and (v) Phoenix  
Edge SRS-Multi-Sector Fixed Income Series*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et. al.*

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

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A., individually  
and as Administrative Agent for Various lenders  
party to the Term Loan Agreement described  
herein, et al.,

Defendants.

Chapter 11 Case

Case No. 09-50026 (REG)

(Jointly Administered)

Adv. Pro. No. 09-00504 (REG)

**JOINDER IN OMNIBUS REPLY IN SUPPORT OF CERTAIN  
TERM LENDERS' RULE 12 MOTIONS**

Defendants (i) Virtus Multi Sector Fixed Income Fund (“Virtus Fixed Income Fund”), (ii) Virtus Multisector Short Term Bond Fund (“Virtus Short Term Bond Fund”), (iii) Virtus Senior Floating Rate Fund (“Virtus Floating Rate Fund”), (iv) Phoenix Edge Series Fund Phoenix Multi Sector Short Term Bond Series (“Phoenix Fund Bond Series”), and (v) Phoenix Edge SRS-Multi-Sector Fixed Income Series (“Phoenix Fixed Income Series”, and collectively, the “Defendants”), by their undersigned attorneys, hereby join adopt and incorporate the *Omnibus Reply In Support Of Certain Term Lenders’ Rule 12 Motions* [Docket No. \_\_\_\_\_] (“Omnibus Reply”), as if set forth fully herein. Defendants’ joinder in the Omnibus Reply applies regardless of whether any of the underlying motions are settled, withdrawn, or otherwise resolved

**WHEREFORE**, Defendants demand judgment against Plaintiff dismissing the Complaint with Prejudice, awarding Defendants’ attorneys’ fees and costs of suit, and such other relief as the Court deems just and appropriate.

Dated: New York, New York  
March 30, 2016

KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP

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