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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re: Chapter 11

MOTORS LIQUIDATION COMPANY, et al., | Case No. 09-50026 (MG)

Debtors. Jointly Administered

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

Plaintiff,

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

ν.

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

Defendants.

JOINDER BY WELLS CAP MGMT – 13923601 IN ARGUMENTS CONTAINED IN CONSOLIDATED REPLY

Defendant Wells Cap Mgmt – 13923601 ("Wells Cap"), by its counsel, Becker, Glynn, Muffly, Chassin & Hosinski LLP, in further support of its motion for judgment on the pleadings and pursuant to this Court's order, dated March 29, 2016 (ECF No. 444), hereby joins in the arguments made in Points I-IV of the Omnibus Reply in Support of Certain Term Lenders' Rule 12 Motions (ECF No. 457).

Wells Cap adopts and incorporates by reference the arguments with respect to serviceextension issues set forth in the above consolidated reply, as if set forth fully herein.

WHEREFORE, Wells Cap respectfully requests that the Court grant judgment on the pleadings in its favor, dismiss the adversary proceeding as against Wells Cap with prejudice, and grant such other and further relief as may be just and proper.

Dated: March 31, 2016

New York, New York

Respectfully submitted,

BECKER, GLYNN, MUFFLY, CHASSIN & HOSINSKI LLP

By: /s/ Jordan E. Stern

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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2016, in accordance with applicable law, a copy of the foregoing was filed electronically. Notice of this filing was sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jordan E. Stern
Jordan E. Stern