| UNITED STATES BANKRUPTCY COURT<br>SOUTHERN DISTRICT OF NEW YORK  | **                                      |  |
|--|---|--|
| In re:  MOTORS LIQUIDATION COMPANY, et al.,  Debtors   | : | Chapter 11 Case No. 09-50026 (MG) (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, | x<br>:<br>:<br>:                        | Adversary Proceeding<br>No. 09-00504 (MG)                |
| -against-  | :                                       |  |
| JPMORGAN CHASE BANK, N.A. et al.,  | :                                       |  |
| Defendants.  | :<br>:<br>- x                           |  |

## STIPULATION AND ORDER EXTENDING TIME TO RESPOND TO FIRST AMENDED ADVERSARY COMPLAINT

WHEREAS, on April 26, 2016, the Plaintiff filed an application for certificate of default against several defendants in the above-captioned adversary proceeding (the "Action"), including against "Gulf Stream Compass CLO 2003-1 Ltd."; "Gulf Stream – Compass CLO 2007 Ltd." and "Gulf Stream – Sextant CLO 2007-1 Ltd." (the "Gulf Stream Defendants") [Adv. Proc. Docket No. 503];

WHEREAS, on May 4, 2016, the Clerk of the Court granted the Plaintiff's application for a certificate of default against the Gulf Stream Defendants [Adv. Proc. Docket No. 536, 537, 531] (the "Certificates of Default"); and

WHEREAS, the Plaintiff and Gulf Stream Defendants agree that the Certificates of Default should be vacated;

## IT IS HEREBY ORDERED AS FOLLOWS:

- The Certificates of Default are vacated as to Gulf Stream Compass CLO 2003-1
   Ltd., Gulf Stream Compass CLO 2007 Ltd. and Gulf Stream Sextant CLO 2007-1 Ltd."
- 2. The date by which the Gulf Stream Defendants must answer the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants [Adv. Proc. Docket No. 91] in the Action is hereby extended to twenty days following the Court's entry of this order.*
- 3. The Gulf Stream Defendants and the Plaintiff expressly reserve and preserve any and all rights, claims, interests, and defenses they each may have in connection with or related to the Action.

|        |                    | MARTIN GLENN   |  |  |  |
|--------|--------------------|--|--|--|--|
|        |                    | By:  |  |  |  |
|        |                    | IT IS SO ORDERED:  |  |  |  |
|        |                    | Attorneys for Plaintiff  |  |  |  |
|        |                    | Tel: (212) 510-7008  |  |  |  |
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|        |                    | Eric B. Fisher   |  |  |  |
|        |                    | By: /s/ Eric B. Fisher   |  |  |  |
|        |                    | BINDER SCHWARTZ LLP  |  |  |  |
|        |                    | Stream – Sextant CLO 2007-1 Ltd.   |  |  |  |
|        |                    | Attorneys for Gulf Stream Compass CLO 2003-1 Ltd.,<br>Gulf Stream – Compass CLO 2007 Ltd. and Gulf |  |  |  |
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|        |                    | Brian E. Greer   |  |  |  |
|        |                    | By: /s/ Brian E. Greer   |  |  |  |
|        |                    | DECHERT LLP  |  |  |  |
| Daica. | May 16, 2016       | Respectivity submitted,  |  |  |  |
| Dated: | New York, New York | Respectfully submitted,  |  |  |  |
|        |                    |  |  |  |  |

UNITED STATES BANKRUPTCY JUDGE