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Four Corners CLO III Ltd., Genesis CLO 2007-1 Ltd,  
and Shiprock Finance, SPC, on behalf of SF-3 Segregated Portfolio*

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

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<i>In re:</i>	:	
	:	
	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	
	:	Case No. 09-50026 (REG)
Debtors	:	(Jointly Administered)
	:	
	:	

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MOTORS LIQUIDATION COMPANY AVOIDANCE	:	
ACTION TRUST, by and through the Wilmington	:	
Trust Company, solely in its capacity as Trust	:	Adversary Proceeding
Administrator and Trustee,	:	No. 09-00504 (REG)
Plaintiff,	:	
	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A. et al.,	:	
	:	
Defendants.	:	

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**JOINDER BY FOUR CORNERS CLO II LTD., FOUR CORNERS  
CLO III LTD., GENESIS CLO 2007-1 LTD, AND SHIPROCK FINANCE,  
SPC, ON BEHALF OF SF-3 SEGREGATED PORTFOLIO IN AD HOC  
GROUP OF ANSWERING TERM LENDERS' ANSWER AND MOTION  
OF AD HOC GROUP OF TERM LENDERS (1) TO VACATE CERTAIN PRIOR  
ORDERS OF THE COURT; AND (2) TO DISMISS THE ADVERSARY PROCEEDING**

Four Corners CLO II Ltd., Four Corners CLO III Ltd., Genesis CLO 2007-1 Ltd, and Shiprock Finance, SPC, on behalf of SF-3 Segregated Portfolio<sup>1</sup> (collectively, the “**New Ad Hoc Term Lenders**”), by and through their undersigned counsel, hereby join in, and adopt the same as if fully set forth herein:

- i. *Motion of Ad Hoc Group of Term Lenders (1) to Vacate Certain Prior Orders of the Court; and (2) to Dismiss the Adversary Proceeding* [Docket No. 262] (the “**Ad Hoc Term Lenders’ Motion to Dismiss**”);
- ii. *Omnibus Reply In Support of Certain Term Lenders’ Rule 12 Motions* [Docket No. 467]; and
- iii. *Answer and Cross-Claims of Ad Hoc Group of Answering Term Lenders* [Docket No. 334], as to the Answer only.

WHEREFORE, the New Ad Hoc Term Lenders respectfully request that the Court grant the Ad Hoc Term Lenders’ Motion to Dismiss and dismiss the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payment, and (4) Disallowance of Claims by Defendants* [Docket No. 91] as against the New Ad Hoc Term Lenders with prejudice, and that the Court grant such other relief as the Court may deem just and proper.

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<sup>1</sup> SF-3 Segregated Portfolio is the defendant named in the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payment, and (4) Disallowance of Claims by Defendants* [Docket No. 91].

Dated: May 18, 2016  
New York, New York

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

By: /s/ Andrew K. Glenn

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