

BINDER & SCHWARTZ LLP

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Attorneys for Plaintiff

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

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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

Adversary Proceeding

Plaintiff,

Case No. 09-00504 (MG)

against

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

Defendants.

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CERTIFICATE OF NO OBJECTION

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Rules of the United States
Bankruptcy Court for the Southern District of New York, and the Sixth Amended Order Pursuant
to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case

Management Procedures dated May 5, 2011 [Dkt. No. 10183] (the “**Sixth Amended Case Management Order**”), the undersigned hereby certifies as follows:

1. On May 11, 2016, the Motors Liquidation Company Avoidance Action Trust (“**Plaintiff**”) filed a Notice of Presentment of Application for Issuance of a Second Letter Rogatory [Adv. Dkt. No. 597] (the “**Application**”).

2. The deadline for submitting objections to the Application was May 18, 2016 at 4:00 p.m. (Eastern Time). Presentment is scheduled for May 23, 2016 at 5:00 p.m.

4. No objections have been filed and served with respect to the Application.

5. An electronic copy of the proposed order that was annexed to the Application will be re-submitted to the Court, along with this Certificate of No Objection pursuant to the Sixth Case Management Order.

Based on the foregoing, Plaintiff respectfully requests that the proposed order be entered.

Dated: New York, New York
May 20, 2016

Respectfully submitted,

BINDER & SCHWARTZ LLP

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*Attorneys for the Motors Liquidation
Company Avoidance Action Trust*