

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

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

-----		X
	:	
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 (MG)
Plaintiff,	:	
	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A. <i>et al.</i> ,	:	
	:	
Defendants.	:	

----- 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 the Illinois Municipal Retirement Fund¹ [Adv. Proc. Docket No. 503];

¹ "Fidelity Illinois Muni Ret Fd." was 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 Payments, and (4) Disallowance of Claims by Defendants* [Adv. Proc. Docket No. 91] (the "First Amended Complaint") in addition to the Illinois Municipal Retirement Fund. Upon information and belief, Fidelity Illinois Muni Ret Fd., was the account name of the Illinois Municipal Retirement Fund's investment, and was incorrectly named in the First Amended Complaint.

WHEREAS, on May 3, 2016, the Clerk of the Court granted the Plaintiff's application for a certificate of default against the Illinois Municipal Retirement Fund [Adv. Proc. Docket No. 522] (the "Certificate of Default"); and

WHEREAS, the Plaintiff and the Illinois Municipal Retirement Fund agree that the Certificate of Default should be vacated;

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Certificate of Default is vacated as to Illinois Municipal Retirement Fund.
2. The date by which the Illinois Municipal Retirement Fund 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 parties reserve and preserve any and all rights, claims, interests, and defenses, they each may have in connection with or related to the Action. Service by e-mail of Plaintiff's First Interrogatories and First Document Requests to Non-JPMorgan Defendants, dated May 26, 2016, shall be effective as to Illinois Municipal Retirement Fund. Illinois Municipal Retirement Fund shall have thirty days following the Court's entry of this order to respond to the Plaintiff's discovery requests.

Dated: New York, New York
June 2, 2016

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

By: /s/ Andrew K. Glenn
Andrew K. Glenn
(aglenn@kasowitz.com)
Isaac S. Sasson
(isasson@kasowitz.com)

1633 Broadway
New York, New York 10019
Tel: (212) 506-1700

Attorneys for Illinois Municipal Retirement Fund

BINDER SCHWARTZ LLP

By: /s/ Michael M. Hodgson
Eric B. Fisher
(efisher@binderschwartz.com)
Michael M. Hodgson
(mhodgson@binderschwartz.com)

366 Madison Avenue, 6th Floor
New York, New York 10017
Tel: (212) 510-7008

Attorneys for Plaintiff

IT IS SO ORDERED:

By: _____
MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE