

**DAVIS POLK & WARDWELL LLP**

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Account of Muzinich Loan Fund Plus*

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

In re:	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	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,	Adversary Proceeding
Plaintiff,	Case No. 09-00504 (MG)
vs.	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for various lenders party to the Term Loan Agreement described herein, <i>et al.</i> ,	
Defendants.	

**JOINDER IN MOTION FOR  
JUDGMENT ON THE PLEADINGS**

Defendants Meritage Fund LLC f/k/a Meritage Fund Ltd. and Muzinich & Company  
(Ireland) Ltd. for the Account of Muzinich Loan Fund Plus (collectively, “**the Defendants**”) by

their undersigned counsel, hereby join in the arguments made in the following motion for judgment on the pleadings:

1. *Memorandum of Law in Support of the Moving Term Loan Lenders' Motion for Judgment on the Pleadings* [Dkt. No. 390].
2. *Reply Memorandum of Law in Further Support of the Moving Term Loan Lenders' Motion for Judgment on the Pleadings* [Dkt. No. 456].

The Defendants adopt the arguments set forth in the above pleadings as if the same were set forth fully herein. The Defendants' joinder applies regardless of whether such motion is settled, withdrawn or otherwise resolved.

WHEREFORE, the Defendants respectfully request that the Court dismiss the adversary proceeding with prejudice as to the Defendants and grant the Defendants such other and further relief as it deems just and proper.

Dated: New York, New York  
June 7, 2016

Respectfully submitted,

By: /s/ Elliot Moskowitz  
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