

**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) |
| <hr/>   |   |                        |
| MOTORS LIQUIDATION COMPANY AVOIDANCE<br>ACTION TRUST, by and through the Wilmington Trust<br>Company, solely in its capacity as Trust Administrator and<br>Trustee, | : | Adversary Proceeding   |
|   | : | Case No. 09-00504 (MG) |
|   | : |                        |
| Plaintiff,  | : |                        |
|   | : |                        |
| vs.   | : |                        |
|   | : |                        |
| JPMORGAN CHASE BANK, N.A., individually and as<br>Administrative Agent for Various Lenders Party to the Term<br>Loan Agreement described herein, <i>et al.</i> ,    | : |                        |
|   | : |                        |
| Defendants.   | : |                        |

**EX PARTE ORDER AUTHORIZING DEFENDANT JPMORGAN  
CHASE BANK, N.A. TO FILE EXHIBITS TO THE “PRELIMINARY  
LEGAL BRIEF OF DEFENDANTS’ STEERING COMMITTEE  
REGARDING COLLATERAL IDENTIFICATION ISSUES” UNDER SEAL**

UPON CONSIDERATION of the June 16, 2016 ex parte motion (the “Motion”) of defendant JPMorgan Chase Bank, N.A. (“JPMorgan”) to file Exhibits A through C (the “Exhibits”) to the “Preliminary Legal Brief of Defendants’ Steering Committee Regarding Collateral Identification Issues” (ECF Doc. # 630) under seal; and

WHEREAS it appears that this Court has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334;

WHEREAS it appears that the Motion is a core proceeding pursuant to 28 U.S.C. § 157;

WHEREAS the legal and factual bases set forth in the Motion establish that the Exhibits consist of information produced by a non-party to this action that the non-party designated as “CONFIDENTIAL” under the April 18, 2016 “Amended Agreed Protective Order” (the “Protective Order”) (ECF Doc. # 489) in the above-captioned action, and the Exhibits are

therefore required to be filed under seal with the Clerk of Court pursuant to paragraph 12 of the Protective Order; and

WHEREAS pursuant to Rule 9077-1(b) of the Local Bankruptcy Rules for the Southern District of New York good cause has been shown in support of the issuance of this order upon an *ex parte* motion;

AFTER due deliberation and sufficient cause therefore, it is hereby:

1. ORDERED that the Motion is **GRANTED**; and it is further
2. ORDERED, pursuant to section 107(b)(1) of the Bankruptcy Code, Rule 9018 of the Bankruptcy Rules and General Order M-399, that JPMorgan is authorized to file the Exhibits under seal and the United States Bankruptcy Clerk for the Southern District of New York is directed to accept for filing and seal the Exhibits; and it is further
3. ORDERED that any other party to the above-captioned adversary proceeding may obtain an unredacted copy of the Exhibits on a CONFIDENTIAL basis under the terms of the Protective Order by contacting JPMorgan's counsel and requesting such a copy; and it is further
4. ORDERED that, upon the conclusion of the above-captioned adversary proceeding, JPMorgan will either move to unseal or dispose of the Exhibits; and it is further
5. ORDERED that this Order is without prejudice to the rights of any party in interest, or the United States Trustee, to seek to unseal the Exhibits or any parts of them; and it is further
6. ORDERED that this Court retains jurisdiction over the implementation of this Order.

IT IS SO ORDERED.

Dated: June 23, 2016  
New York, New York

/s/Martin Glenn  
MARTIN GLENN  
United States Bankruptcy Judge