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**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 (REG) |
|                                     | (Jointly Administered)  |
| Debtors                             | :                       |
|                                     | :                       |
|                                     | :                       |

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

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**JOINDER BY ILLINOIS MUNICIPAL RETIREMENT FUND 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**

Illinois Municipal Retirement Fund<sup>1</sup> (“**IMRF**”), by and through its undersigned counsel, hereby joins in, and adopts 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, IMRF respectfully requests that the Court grant the Ad Hoc Term Lenders’ Motion to Dismiss and dismiss the First Amended Complaint as against IMRF 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> “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 Illinois Municipal Retirement Fund. Upon information and belief, Fidelity Illinois Muni Ret Fd., was the account name of Illinois Municipal Retirement Fund’s investment, and was incorrectly named in the First Amended Complaint.

Dated: June 27, 2016  
New York, New York

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

By: /s/ Andrew K. Glenn  
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