

Scott S. Balber  
Herbert Smith Freehills New York LLP  
450 Lexington Avenue, 14th Floor  
New York, NY 10017  
Tel.: (917) 542-7600

*Attorneys for WM Pool-High Yield Fixed Interest Trust*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

_____ )	
In re )	Chapter 11 Case
)	
MOTORS LIQUIDATION COMPANY, et al., )	Case No. 09-50026 (REG)
)	
Debtors. )	(Jointly Administered)
_____ )	
MOTORS LIQUIDATION COMPANY )	
AVOIDANCE ACTION TRUST, by and )	Adversary Proceeding
Through Wilmington Trust Company, solely )	
in its capacity as Trust Administrator and )	Case No. 09-00504 (REG)
Trustee, )	
Plaintiff, )	
vs. )	
)	
JPMORGAN CHASE BANK, N.A., et al., )	
)	
Defendants. )	
_____ )	

**DECLARATION OF JENNIFER DE LEO IN SUPPORT OF WM POOL-HIGH YIELD FIXED INTEREST TRUST'S MOTION TO QUASH SERVICE OF PROCESS AND VACATE THE CERTIFICATE OF DEFAULT**

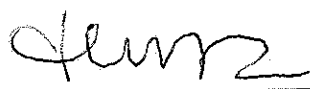
The undersigned hereby declares, under penalty of perjury, as follows:

1. I am Senior Legal Counsel in the National Australia Bank Group ("NAB Group").

In my role as Senior Legal Counsel, I am familiar with WM Pool-High Yield Fixed Interest Trust ("WM"), which is a trust for which MLC Investments Limited serves as trustee. MLC Investments Limited is part of the NAB Group. This declaration is based on my personal knowledge and my review of WM's business records.

2. WM was established in Australia and maintains no presence in the United States. WM does not maintain offices at 333 South Grand Street, Los Angeles, California, or anywhere else in the United States, nor are any of its officers or employees located in the United States.
3. WM has a contractual relationship with Oaktree Capital Management, LLC ("Oaktree") pursuant to which Oaktree serves as an investment manager for WM. The contract between WM and Oaktree does not appoint Oaktree as WM's managing or general agent, nor does it authorize Oaktree to accept service on behalf of WM. To the best of my knowledge, WM has never appointed Oaktree as its general agent, nor authorized Oaktree to accept service on behalf of WM.
4. I understand that plaintiff in this action attempted to serve WM by mailing a summons and complaint to Oaktree's office at 333 South Grand Street, Los Angeles, California. The plaintiff in this action has not sent a summons and complaint, nor any other document, to WM's offices.
5. I understand that Oaktree has forwarded the Amended Summons and First Amended Adversary Complaint to WM as a courtesy. At no time has anyone purported to serve the Amended Summons and First Amended Adversary Complaint on WM.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 17<sup>th</sup> day of June, 2016, at Perth, Australia.

By:   
\_\_\_\_\_  
Jennifer De Leo  
Senior Legal Counsel