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September 14, 2016

Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Courtroom 523  
New York, NY 10004-1408

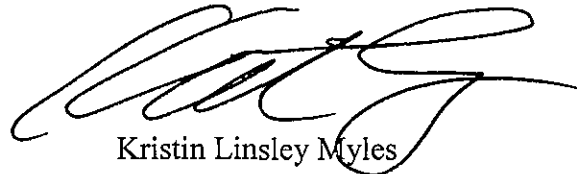
Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank N.A., et al.*, Adv. Pro. 09-00504

Dear Judge Glenn:

We write to update the Court with respect to the current process regarding JPMorgan's advice of counsel defense and to respond to JPMorgan's letter submitted on September 13, 2016. Pursuant to this Court's order dated July 19, 2016 (Dkt. 678 at \*2), JPMorgan filed a revised privilege log on September 2, 2016 (Dkt. 718). On September 12, 2016, pursuant to this Court's order dated September 1, 2016 (Dkt. 716 at \*2), Cross-Claimants filed a submission responding to JPMorgan's privilege designations (Dkt. 723). After reviewing Cross-Claimants' submission regarding privilege designations, JPMorgan filed its September 13, 2016 letter proposing that the parties meet and confer with Cross-Claimants (Dkt. 726).

Cross-Claimants agree with JPMorgan that a meet and confer may be highly productive at this stage and we would welcome such a process. Cross-Claimants would very much like to reduce the number of documents that the Court might have to review *in camera*, and a meet and confer process will provide more granular information about the documents at issue that is not contained on JPMorgan's Privilege Log. Absent further instruction from the Court, Cross-Claimants will meet and confer with JPMorgan and the parties will report back to the Court on any progress or further disagreements.

Respectfully submitted,



Kristin Linsley Myles

cc: All Counsel of Record (via ECF)