

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

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| In re:<br><br>MOTOR LIQUIDATION COMPANY, <i>et al.</i> ,<br><br>Debtors.  | Chapter 11<br><br>Case No. 09-50026 (MG)<br><br>(Jointly Administered) |
| MOTOR LIQUIDATION COMPANY<br>AVOIDANCE ACTION TRUST, by and through<br>the Wilmington Trust Company, solely in its<br>capacity as Trust Administrator and Trustee,<br><br>Plaintiff,<br><br>vs.<br><br>JP MORGAN CHASE BANK, N.A., <i>et al.</i><br><br>Defendants. | Adversary Proceeding<br><br>Case No. 09-00504 (MG)                     |

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO  
ANSWER TO FIRST AMENDED ADVERSARY COMPLAINT**

It is hereby stipulated and agreed, by and between the undersigned parties, that the time by which defendant Dallas Employee Retirement Fund (identified in Exhibits 3 and 4 to the Amended Complaint as “Employees Retirement Fund of the City of Dallas”, “BlackRock Employees’ Retirement Fund of the City of Dallas”, and “Oaktree - Employees Retirement Fund of the City of Dallas”<sup>1</sup>) must answer the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3)*

<sup>1</sup> A Stipulation and Order vacating the certificate of default entered against Dallas Employee Retirement Fund as it relates to the account managed by Oaktree (and incorrectly identified in the Complaint as “Oaktree – Employees Retirement Fund of the City of Dallas”) and extending the time to answer the First Amended Complaint until September 30, 2016 was entered by the Court on September 14, 2016 [D.I. 727]. Dallas Employee Retirement Fund subsequently learned that it was also incorrectly identified in the First Amended Complaint as “Employees Retirement Fund of the City of Dallas” and “BlackRock Employees’ Retirement Fund of the City of Dallas”. As such, this Stipulation and [Proposed] Order is being filed out of an abundance of caution to clarify that Dallas Employee Retirement Fund’s time to answer the First Amended Complaint has been extended to September 30, 2016 as it relates to all accounts.

*Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants*

[Adv. Proc. Docket No. 91] in the above-captioned adversary proceeding is hereby extended to and including September 30, 2016.

*[The remainder of this page has been left intentionally blank]*

Dated: New York, New York  
September 22, 2016

**Respectfully submitted,**

**HAHN & HESSEN LLP**

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*Attorneys for Plaintiff*

**IT IS SO ORDERED:**

Dated: New York, New York  
September \_\_, 2016

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MARTIN GLENN  
United States Bankruptcy Judge