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[additional counsel listed on signature page]

Attorneys for the Defendants The Term Lenders as originally listed in Appendix A to ECF No. 241

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

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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 ACTION TRUST, by and through))	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as))	
Trust Administrator and Trustee,))	Case No. 09-00504 (MG)
))	
Plaintiff,))	
))	
vs.))	
))	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,))	
))	
Defendants.))	
))	

CERTIFICATE OF NO OBJECTION

Pursuant to Rule 9075-2 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, the undersigned hereby certify as follows:

1. On September 27, 2016, Plaintiff Motors Liquidation Company Avoidance Action Trust, Defendant JPMorgan Chase Bank, N.A., certain Defendants and Cross-Claimants as originally listed in Appendix A to Docket No. 241, and non-party Weil Gotshal & Manges LLP, by and through undersigned counsel, filed a Notice of Presentment of Order Pursuant to Federal Rule of Evidence 502(d) (Adv. Proc. ECF No. 738, and as corrected on September 28, 2016, Adv. Proc. ECF No. 626), which included a Stipulation and [Proposed] Supplemental Order Pursuant to Federal Rule of Evidence 502(d) (the "Proposed Order").

2. The deadline for submitting objections to the Proposed Order was October 4, 2016, at 1:00 p.m. (Eastern Time). Presentment is scheduled for October 6, 2016 at 1:00 p.m. (Eastern Time).

3. No objections have been filed and served with respect to the Proposed Order.

4. An electronic copy of the Proposed Order will be re-submitted to the Court, along with this Certificate of No Objection pursuant to the Court's Individual Rules.

Based on the foregoing, the Term Loan Lenders respectfully requests that the Proposed Order be entered.

Dated: New York, New York
October 6, 2016

MUNGER, TOLLES & OLSON LLP

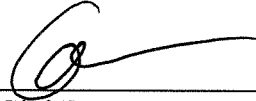
By: /s/ Bradley R. Schneider
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*Attorneys for the Defendants The Term Lenders
as originally listed in Appendix A to ECF No.
241*

CERTIFICATE OF SERVICE

I certify that, on 10/6/2016, I caused the foregoing document to be served via the Court's ECF system upon all appearing parties.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6, 2016 at Los Angeles, California.



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