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Attorneys for Napier Park Distressed Debt Opportunity Master Fund Ltd. (f/k/a CAI Distressed Debt Opportunity Master Fund Ltd.)

**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 through)
Wilmington Trust Company, solely in its capacity as)
Trust Administrator and Trustee,)

) Adversary Proceeding

) Case No. 09-00504 (REG)

Plaintiff,)

vs.)

JPMORGAN CHASE BANK, N.A., *et al.*,)

Defendants.)

RULE 7007.1 DISCLOSURE

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy Procedure, and in accordance with the *Memorandum Opinion and Order Denying the Moving Term Loan Lenders' Motion to Seal* (Dkt. No. 811), Defendant Napier Park Distressed Debt Opportunity Master Fund Ltd. (f/k/a CAI Distressed Debt Opportunity Master Fund Ltd.), by and through its undersigned attorneys, certifies the following:

Napier Park Distressed Debt Opportunity Master Fund Ltd. (f/k/a CAI Distressed Debt Opportunity Master Fund Ltd.) is a Cayman Islands exempted company. Napier Park Distressed Debt Opportunity Fund LLC, Napier Park Distressed Debt Opportunity Fund Ltd., Trimark Associates, and Thalia Investments are the only entities that directly or indirectly own 10% or more of the equity interests in Napier Park Distressed Debt Opportunity Master Fund Ltd. (f/k/a CAI Distressed Debt Opportunity Master Fund Ltd.).

Dated: December 20, 2016

Respectfully submitted,

/s/ Bruce Bennett

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*Attorneys for Napier Park Distressed Debt
Opportunity Master Fund Ltd. (f/k/a CAI
Distressed Debt Opportunity Master Fund
Ltd.)**

*[*a complete list of represented Defendants
appears in Appendix A to the Consent Motion
to Withdraw (Dkt. No. 753)]*

CERTIFICATE OF SERVICE

I hereby certify that, on December 20, 2016, I caused to be served a true and correct copy of the *Rule 7007.1 Disclosure* filed by Napier Park Distressed Debt Opportunity Master Fund Ltd. (f/k/a CAI Distressed Debt Opportunity Master Fund Ltd.) by operation of the Case Management/Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of New York (the "CM/ECF System") upon all parties registered in the CM/ECF System.

/s/ Bruce Bennett
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