

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

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*In re:* :  
 MOTORS LIQUIDATION COMPANY, et al., : Chapter 11  
 Debtors. : Case No. 09-50026 (MG)  
 : (Jointly Administered)  
 :

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 MOTORS LIQUIDATION COMPANY AVOIDANCE :  
 ACTION TRUST, by and through the Wilmington :  
 Trust Company, solely in its capacity as Trust : Adversary Proceeding  
 Administrator and Trustee, : No. 09-00504 (MG)  
 Plaintiff, :  
 -against- :  
 JPMORGAN CHASE BANK, N.A. *et al.*, :  
 Defendants. :

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**STIPULATION AND ORDER FURTHER EXTENDING TIME TO  
RESPOND TO FIRST AMENDED ADVERSARY COMPLAINT**

WHEREAS, on February 15, 2016, this Court entered a Stipulation and Order [Adv. Proc. Docket No. 849] under which Phoenix CLI II Ltd. f/k/a Avenue CLO V Ltd. was allowed thirty days thereafter in which to answer or otherwise plead in response to the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Adv. Proc. Docket No. 91]; and

WHEREAS, Phoenix CLO II Ltd. has requested that Plaintiff allow it additional time to investigate and evaluate possible defenses so that the parties also might explore potential settlement possibilities; and

WHEREAS, the Plaintiff and Phoenix CLO II Ltd. are in agreement to extending the response deadline of Phoenix CLO II Ltd. to and including April 7, 2017.

**IT IS HEREBY ORDERED AS FOLLOWS:**

1. The date by which Avenue CLO V, Ltd., now known as Phoenix CLO II, Ltd., must answer or otherwise plead in response to the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Adv. Proc. Docket No. 91] in the Action is hereby extended to and including April 7, 2017.

Dated: New York, New York  
March 15, 2017

Respectfully submitted,

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*Attorneys for Plaintiff*

**IT IS SO ORDERED:**

By: \_\_\_\_\_  
**MARTIN GLENN**  
**UNITED STATES BANKRUPTCY JUDGE**