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

In re:	:	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (MG)
Debtors.	:	(Jointly Administered)
MOTORS LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee,		Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (MG)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various Lenders Party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

**DEFENDANTS' UNOPPOSED MOTION TO FILE A SINGLE RESPONSIVE BRIEF IN
EXCESS OF PAGE LIMIT IN OPPOSITION TO FOUR *IN LIMINE* MOTIONS**

JPMorgan Chase Bank, N.A. and the other members of the Defendants' Steering Committee (collectively, the "Term Lenders") respectfully move for an order permitting the Term Lenders to file a combined responsive brief in excess of 25 pages, which will respond to four of the seven *in limine* motions filed by the Motors Liquidation Company Avoidance Action Trust (the "Avoidance Trust"). In support of their motion, the Term Lenders state as follows:

1. On March 8, 2017, the Avoidance Trust filed seven motions *in limine*, including four motions that are closely related. Those four motions are: (1) the Motion *in Limine* to Exclude the KPMG Report and its Schedules and Work Papers [ECF # 872]; (2) the Motion *in Limine* to Exclude the Expert Report and Testimony of Abdul Lakhani [ECF # 869]; (3) the Motion *in Limine* to Exclude the Expert Reports and Testimony of Glenn Hubbard [ECF # 870]; and (4) the Motion *in Limine* to Exclude the Expert Reports and Testimony of Maryann Keller [ECF # 871] (collectively, the "Valuation MILs").

2. The Term Lenders' response to the Valuation MILs is due on March 22, 2017.

3. The Court's Chambers' Rules provide that "responsive briefs shall be no more than 25 pages in length."

4. The Term Lenders believe that responding to the four Valuation MILs in a single brief will be most useful to the Court by avoiding repetition and setting forth how the challenged evidence and experts fit together. The Term Lenders expect that this response will exceed 25 pages but will be significantly shorter than the 91 total pages used by the Avoidance Trust in making these four motions (or the 100 total pages that would be available under the Court's rules if the Term Lenders filed four separate responses to these four motions).

Accordingly, the Term Lenders seek permission to file a single responsive brief to the Valuation MILs that exceeds 25 pages.

5. The Avoidance Trust has advised that it has no objection to this request.

Dated: New York, New York
March 17, 2017

Respectfully submitted,

KELLEY DRYE & WARREN LLP

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(Dkt. No. 753)*

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

In re:	:	Chapter 11 Case
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Debtors.	:	(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 Administrator and Trustee,	:	Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (MG)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various Lenders Party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

**[PROPOSED] ORDER ALLOWING TERM LENDERS TO
FILE A SINGLE RESPONSIVE BRIEF IN EXCESS OF PAGE LIMIT IN
OPPOSITION TO FOUR *IN LIMINE* MOTIONS**

Upon the motion, dated March 17, 2017 (the “Motion”) of JPMorgan Chase Bank, N.A. and the other members of the Defendants’ Steering Committee (collectively, the “Term Lenders”), for leave to file a single brief in response to four of the motions *in limine* filed by the Motors Liquidation Company Avoidance Action Trust, *i.e.*, the motions to exclude: (1) the KPMG Report and its schedules and work papers [ECF # 872]; (2) the Expert Report and Testimony of Abdul Lakhani [ECF # 869]; (3) the Expert Reports and Testimony of Glenn Hubbard [ECF # 870]; and (4) the Expert Reports and Testimony of Maryann Keller [ECF

871] (collectively, the “Valuation MILs”) in excess of the page limit, and upon sufficient cause therefor, it is:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the Term Lenders may file a single brief in excess of 25 pages in response to the four Valuation MILs.

Dated: _____, 2017
New York, New York

Honorable Martin Glenn
United States Bankruptcy Judge