

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

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<i>In re:</i>	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (MG)
	:	f/k/a General Motors Corp., <i>et al.</i>
	:	
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	:	Adversary Proceeding
and Trustee,	:	No. 09-00504 (MG)
	:	
Plaintiff,	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A. <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
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**STIPULATION AND ORDER  
FURTHER EXTENDING TIME TO RESPOND TO FIRST AMENDED COMPLAINT**

WHEREAS, on March 3, 2017, this Court entered a Stipulation and Order [ECF No. 860] under which BTG Pactual Chile S.A. Administrador General de Fondos and its predecessor Celfin Capital S.A. Adm. General de Fondos para Ultra Fondo de Inversion (“Defendant”) were allowed until March 17, 2017 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* [ECF No. 91]; and

WHEREAS, Defendant has requested that Plaintiff allow it additional time to investigate and evaluate possible defenses so that the parties also might explore settlement possibilities; and

WHEREAS, the Plaintiff and Defendant are in agreement to extending the response deadline of Defendant to and including March 31, 2017.

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the date by which the Defendant 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* [ECF No. 91] in the Action is hereby extended to and including March 31, 2017.

Dated: New York, New York  
March 17, 2017

/s/ Eric B. Fisher  
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*Attorney for BTG Pactual Chile S.A.  
Administradora General De Fondos*

**IT IS SO ORDERED:**

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