

**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> ,	: :
f/k/a General Motors Corp., <i>et al.</i>	: Case No.: 09-50026 (MG)
	: :
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 EXTENDING TIME FOR GENERAL
MOTORS LLC AND KPMG LLP TO FILE MOTIONS TO SEAL,
SOME OR ALL OF THE PRE-TRIAL BRIEFS**

WHEREAS, on April 18, 2016, the Court entered the *Amended Agreed Protective Order* (ECF No. 489) (the “**Amended Agreed Protective Order**”), which governs discovery provided by and to all parties and non-parties in this Action;

WHEREAS, on March 8, 2017, the Court entered a *Stipulation and Order Permitting the Parties to File Pre-Trial Briefs Under Seal* (ECF No. 863) (the “**March 8, 2017 Stipulation and Order**”)¹, setting forth the procedures regarding the treatment of the Confidential or OAEO

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the March 8, 2017 Stipulation and Order.

nature of the Pre-trial Briefs in accordance with the terms therein and the Amended Agreed Protective Order;

WHEREAS, in accordance with the March 8, 2017 Stipulation and Order, the deadline for any party or third party to file any motion to seal some or all of the Pre-trial Briefs is March 20, 2017;

WHEREAS, General Motors LLC ("**New GM**") and KPMG LLP ("**KPMG**") each request an extension of time to file any motion to seal some or all of the Pre-trial Briefs to March 24, 2017;

WHEREAS, counsel for New GM, counsel for KPMG, counsel for Plaintiff and counsel for Defendant JPMorgan Chase Bank, N.A. and counsel for the Defendants' Steering Committee which collectively filed the Defendants' Pre-trial Brief have met and conferred regarding such request for an extension of time to file any motion to seal some or all of the Pre-trial Briefs;

WHEREAS, good cause exists for granting New GM and KPMG an extension of time to file any motions to seal some or all of the Pre-trial Briefs;

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that:

1. The deadline to file any motion to seal some or all of the Pre-trial Briefs shall be extended to on or before March 24, 2017, solely with respect to New GM and KPMG.
2. The deadline for Parties to file the Pre-trial Briefs on the Court's electronic docket in the event that no party or third party files a motion to seal some or all of the Pre-trial Briefs shall be extended to on or before March 27, 2017.
3. The remainder of the March 8, 2017 Stipulation and Order shall remain in full force and effect.

Dated: New York, New York
March 17, 2017

New York, New York
March 17, 2017

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March 17, 2017

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Lending Partners LLC, Goldman Sachs –
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Funding Inc., Muzinich &
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Muzinich Loan Fund Plus (f/k/a Muzinich &
Company (Ireland) Ltd. for the Account of
Extra Yield \$ Loan Fund), and The Royal
Bank of Scotland plc*

IT IS SO ORDERED.

Dated: March 20, 2017
New York, New York

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge