

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

In re: MOTOR LIQUIDATION COMPANY, <i>et al.</i> , Debtors.	Chapter 11 Case No. 09-50026 (MG) (Jointly Administered)
MOTOR LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee, Plaintiff, vs. JP MORGAN CHASE BANK, N.A., <i>et al.</i> Defendants.	Adversary Proceeding Case No. 09-00504 (MG)

**STIPULATION AND [PROPOSED] ORDER VACATING CERTIFICATES OF
DEFAULT AND EXTENDING TIME TO ANSWER AMENDED COMPLAINT**

WHEREAS, on April 26, 2016, the Plaintiff filed an application for certificates of default against several defendants in the above-captioned adversary proceeding (“Action”), including against “Primus CLO I Ltd.” and “Primus CLO II Ltd.” (together, the “Primus Defendants”) [Adv. Proc. Doc. No. 503];

WHEREAS, on May 3, 2016 and May 4, 2016, the Clerk of the Court filed certificates of default against the Primus Defendants [Adv. Proc. Docket Nos. 518 and 535, respectively] (“Certificates of Default”); and

WHEREAS, the Plaintiff and the Primus Defendants agree that the Certificates of Default should be vacated.

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Certificates of Default are vacated as to Defendants Primus CLO I Ltd. and Primus CLO II Ltd.

2. The date by which the Primus Defendants must answer 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. Doc. No. 91] in the Action is hereby extended June 30, 2017.

3. The Primus Defendants and the Plaintiff expressly reserve and preserve any and all rights, claims, interests and defenses they each may have in connection with or related to the Action.

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Dated: New York, New York
June 13, 2017

Respectfully submitted,

HAHN & HESSEN LLP

By: /s/ Mark T. Power

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Ltd.*

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Attorneys for Plaintiff

IT IS SO ORDERED:

Dated: New York, New York
June __, 2017

MARTIN GLENN
United States Bankruptcy Judge