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BY HAND AND E-MAIL

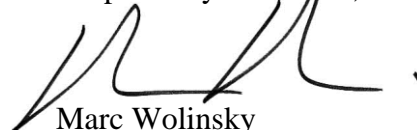
The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, NY 10004-1408

Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan Chase Bank, N.A., et al.*, Case No. 09-00504 (MG)

Dear Judge Glenn:

I write to direct the Court's attention to two recent fixture decisions from the Ohio Court of Appeals. The first case, *Simon v. Underwood*, supports the points made at pages 145-47 and 347-52 of the Term Lenders' post-trial brief. 2017 WL 2223055, at *16, *25 (Ohio Ct. App. May 19, 2017). The second decision, *Zinser v. Auto-Owners Insurance Co.*, supports the points made at pages 130, 345, and 350-52 of the Term Lenders' post-trial brief. 2017 WL 2838393, at *1, *4, *5 (Ohio Ct. App. July 3, 2017).

Respectfully submitted,



Marc Wolinsky

cc: All counsel of record