

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

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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	)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as	)	
Trust Administrator and Trustee,	)	Case No. 09-00504 (MG)
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**STIPULATION AND [PROPOSED] ORDER DISMISSING CROSS-CLAIMS AGAINST  
JPMORGAN CHASE BANK, N.A. BY ARES IIIR/IVR CLO LTD., ARES VR CLO LTD.,  
AND ARES ENHANCED LOAN INVESTMENT STRATEGY III, LTD.**

**IT IS HEREBY STIPULATED AND AGREED**, by and among undersigned  
counsel, as follows:

1. Ares IIIR/IVR CLO Ltd., Ares VR CLO Ltd., and Ares Enhanced Loan Investment Strategy III, Ltd. dismiss with prejudice the cross-claims they asserted against defendant JPMorgan Chase Bank, N.A. contained in ECF No. 241 dated November 16, 2015.
2. The cross-claims against defendant JPMorgan Chase Bank, N.A. by the other Term Loan Lender Defendants are not affected by this order.

Dated: New York, New York  
December 11, 2017

Dated: Los Angeles, California  
December 11, 2017

**KELLEY DRYE & WARREN LLP**

**JONES DAY**

By: /s/ John M. Callagy  
John M. Callagy  
Nicholas J. Panarella  
Martin A. Krolewski  
101 Park Avenue  
New York, New York 10178  
Telephone: (212) 808-7800  
Email: jcallagy@kelleydrye.com

By: /s/ Christopher J. DiPompeo  
Bruce Bennett (*pro hac vice*)  
Erin L. Burke (*pro hac vice*)  
555 South Flower Street, 50th Floor  
Los Angeles, California 90071  
Telephone: (213) 489-3939  
Email: bbennett@jonesday.com  
Email: eburke@jonesday.com

**WACHTELL, LIPTON, ROSEN & KATZ**

Gregory M. Shumaker (*pro hac vice*)  
Christopher J. DiPompeo (*pro hac vice*)  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 879-3939  
Email: gshumaker@jonesday.com  
Email: cdipompeo@jonesday.com

By: /s/ C. Lee Wilson  
Harold S. Novikoff  
Marc Wolinsky  
Amy R. Wolf  
Carrie M. Reilly  
C. Lee Wilson  
51 West 52nd Street  
New York, New York 10019  
Telephone: (212) 403-1000  
Facsimile: (212) 403-2000  
Email: MWolinsky@wlrk.com

*Attorneys for Ares III R/IVR CLO Ltd.,  
Ares VR CLO Ltd., and Ares Enhanced  
Loan Investment Strategy III, Ltd. for  
purposes of defending against claims  
brought by the Avoidance Action Trust*

*Attorneys for Defendant JPMorgan  
Chase Bank, N.A.*

**MUNGER, TOLLES & OLSON LLP**

By: /s/ Bradley R. Schneider  
John W. Spiegel (*pro hac vice*)  
Matthew A. Macdonald (*pro hac vice*)  
Bradley R. Schneider (*pro hac vice*)  
350 South Grand Avenue, 50th Floor  
Los Angeles, California 90071  
Telephone: (213) 683-9100  
Email: john.spiegel@mto.com  
Email: matthew.macdonald@mto.com  
Email: bradley.schneider@mto.com

*Attorneys for Ares III R/IVR CLO Ltd.,  
Ares VR CLO Ltd., and Ares Enhanced  
Loan Investment Strategy III, Ltd.*

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MARTIN GLENN  
United States Bankruptcy Judge

**IT IS SO ORDERED.**

Dated: December \_\_, 2017  
New York, New York