

**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 )	Case No. 09-00504 (MG)
Trust Administrator and Trustee, )	
Plaintiff, )	
vs. )	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> , )	
Defendants. )	
_____ )	

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME  
TO FILE CROSS-CLAIMS AGAINST JPMORGAN CHASE BANK, N.A.  
BY IMMIGON PORTFOLIOABBAU AG**

This Stipulation is entered into by and between defendant Immigon Portfolioabbau ag (formerly known as Österreichische Volksbanken Aktiengesellschaft) (“Immigon”) and defendant JPMorgan Chase Bank, N.A. (“JPMCB”).

**WHEREAS**, on March 2, 2017, Immigon filed cross-claims against JPMCB (ECF No. 857) (“Immigon Cross-Claims”).

**WHEREAS**, on September 7, 2017, the Court so ordered the stipulation between Immigon and JPMCB whereby Immigon dismissed, without prejudice, the Immigon Cross-Claims and Immigon and JPMCB agreed that if Immigon refiled cross-claims on or before

December 31, 2017, the refiled cross-claims would be treated as if such cross-claims were filed on March 2, 2017 (ECF No. 1012).

**WHEREAS**, Immigon and JPMCB wish to further extend the deadline for Immigon to refile cross-claims.

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

1. Immigon and JPMCB expressly reserve and preserve any and all rights and defenses each had with respect to the Immigon Cross-Claims as of March 2, 2017.
2. If Immigon refiles cross-claims on or before April 2, 2018, the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 2, 2017.
3. Immigon and JPMCB may stipulate between and among themselves to further extensions of the deadline for Immigon to refile cross-claims on the same terms set out herein without the need for a court order.

Dated: December 27, 2017

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Dated: December 27, 2017

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/s/  
MARTIN GLENN  
United States Bankruptcy Judge

**IT IS SO ORDERED.**

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