

**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 ORDER DISMISSING  
CROSS-CLAIMS AGAINST JPMORGAN CHASE BANK, N.A. BY BTG PACTUAL**

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

1. BTG Pactual Chile S.A. Administradora General De Fondos (“BTG Pactual”) dismisses, without prejudice, the cross-claims it asserted against JPMorgan Chase Bank, N.A. (“JPMCB”) contained in ECF No. 913 dated March 31, 2017 (“BTG Pactual Cross-Claims”).
2. BTG Pactual and JPMCB expressly reserve and preserve any and all rights and defenses each had with respect to the BTG Pactual Cross-Claims as of March 31, 2017, and if BTG Pactual refiles cross-claims on or before January 31, 2018 the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 31, 2017.

Dated: New York, New York  
October 24, 2017

**KELLEY DRYE & WARREN LLP**

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Dated: New York, New York  
October 24, 2017

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BTG Pactual Chile S.A. Administradora  
General De Fondos*

**IT IS SO ORDERED.**

Dated: February 1, 2018  
New York, New York

/s/ Martin Glenn  
MARTIN GLENN  
United States Bankruptcy Judge