

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

_____)	
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 EXTENDING TIME TO FILE CROSS-CLAIMS AGAINST
JPMORGAN CHASE BANK, N.A. BY BTG PACTUAL**

This Stipulation is entered into by and between defendant BTG Pactual Chile S.A. Administradora General De Fondos (“BTG Pactual”) and defendant JPMorgan Chase Bank, N.A. (“JPMCB”).

WHEREAS, on March 31, 2017, BTG Pactual filed cross-claims against JPMCB (ECF No. 913) (“BTG Pactual Cross-Claims”).

WHEREAS, on February 1, 2018, the Court so ordered the stipulation between BTG Pactual and JPMCB whereby BTG Pactual dismissed, without prejudice, the BTG Pactual Cross-Claims, and BTG Pactual and JPMCB agreed that if BTG Pactual refiled cross-claims on

or before January 31, 2018, the refiled cross-claims would be treated as if such cross-claims were filed on March 31, 2017 (ECF No. 1045).

WHEREAS, on February 1, 2018, the Court so ordered the stipulation whereby BTG Pactual and JPMCB agreed to further extend the deadline for BTG Pactual to refile cross-claims to April 2, 2018, on the terms set forth therein (ECF No. 1046).

WHEREAS, on April 2, 2018, BTG Pactual and JPMCB filed a stipulation further extending the deadline for BTG Pactual to refile cross-claims to December 31, 2018, on the terms set forth therein (ECF No. 1051).

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

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

1. 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.
2. If BTG Pactual refiles cross-claims on or before October 31, 2019, the refiled cross-claims will be treated as if such cross-claims were filed in the Adversary Proceeding on March 31, 2017.
3. BTG Pactual and JPMCB may stipulate between and among themselves to further extensions of the deadline for BTG Pactual to refile cross-claims on the same terms set out herein without the need for a court order.

Dated: December 28, 2018

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WACHTELL, LIPTON, ROSEN & KATZ

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