



Eric B. Fisher
Binder & Schwartz LLP
366 Madison Avenue 6th Floor
New York, NY 10017

(1) 212.933.4551
(1) 212.510.7299
efisher@binderschwartz.com

February 14, 2019

By Hand, ECF, and Email

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

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

Dear Judge Glenn:

We write on behalf of plaintiff, the Motors Liquidation Company Avoidance Action Trust, with the concurrence of JPMorgan, the Defendants Steering Committee, and the Motors Liquidation Company GUC Trust.

Since we last reported to the Court on January 31, 2019 about the parties' settlement in principle, a draft settlement agreement to fully resolve both plaintiff's claims and the cross-claims in the above-captioned action has been circulated. The parties are currently engaged in review and discussion of that draft settlement agreement. When the settlement agreement is finalized, we plan to file a motion seeking the Court's approval of the settlement. We propose to provide a further update to the Court or file the settlement approval motion on or before March 4, 2019.

We are available to answer any questions the Court may have.

Respectfully,

A handwritten signature in blue ink that reads "Eric B. Fisher".

Eric B. Fisher

cc: Counsel of Record (by ECF and email)