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July 1, 2019

By ECF, Email, and FedEx

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, New York 10004-1408

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

Dear Judge Glenn:

We represent the Motors Liquidation Company Avoidance Action Trust (the “AAT”) in connection with the above-referenced action. Pursuant to the global settlement agreement (the “Settlement Agreement”), which was approved by the Court on June 13, 2019, Adv. Pro. Doc. No. 1190, we write to respectfully request that the Court enter the Proposed Order attached hereto dismissing the AAT’s claims in this action with prejudice. As contemplated by the Settlement Agreement, JPMorgan Chase Bank, N.A., will separately file a stipulation of dismissal with respect to the cross-claims that have been asserted in this action.

I thank the Court for its attention to this request.

Respectfully,

/s/ Eric B. Fisher
Eric B. Fisher

cc: All counsel of record (via ECF)

Proposed Order

**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)
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MOTORS LIQUIDATION COMPANY AVOIDANCE ACTION TRUST, by and through the Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee,	:	Adversary Proceeding
Plaintiff,	:	Case No. 09-00504 (MG)
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as Administrative Agent for Various Lenders Party to the Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

[PROPOSED] ORDER OF DISMISSAL

WHEREAS, the Motors Liquidation Company Avoidance Action Trust (the "AAT") has negotiated and agreed to a settlement of its claims in the above-captioned action (the "Action");


NOW, THEREFORE, IT IS HEREBY ORDERED, that:

1. The AAT's claims in the Action are dismissed with prejudice and without costs except as provided and in accordance with the settlement agreement settling all claims in the Action (the "Settlement Agreement").

2. The Settlement Agreement shall not be admissible in any proceeding, except to enforce the terms of the Settlement Agreement.

Dated: May 14, 2019

BINDER & SCHWARTZ LLP

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*Attorneys for the Motors Liquidation
Company Avoidance Action Trust*

SO ORDERED this _____ day of _____, 2019.

Martin Glenn
United State Bankruptcy Judge