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July 1, 2019

By Hand, ECF, and Email

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

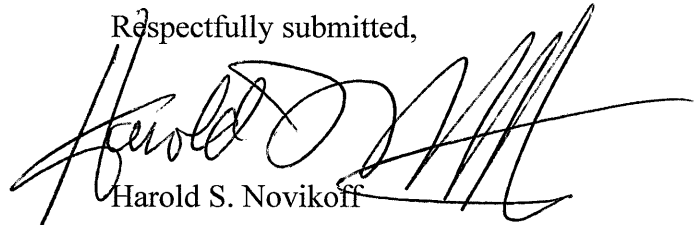
We represent JPMorgan Chase Bank, N.A. in connection with the above-referenced matter. Pursuant to the global settlement agreement (the "Settlement Agreement") that was approved by the Court on June 13, 2019 (Adv. Pro. ECF No. 1190), we respectfully write to request that the Court enter the Stipulation and Proposed Order attached hereto

The Honorable Martin Glenn
July 1, 2019
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dismissing, with prejudice, all claims and cross-claims by the parties to that Stipulation and Proposed Order.

I appreciate the Court's attention to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Harold S. Novikoff", written in a cursive style. The signature is positioned above the printed name "Harold S. Novikoff".

Harold S. Novikoff

CC: All counsel of record (via ECF)

EXHIBIT D

**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)
<hr/>		
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.	:	

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

WHEREAS, the undersigned parties to the above-captioned action (the "Action")
have negotiated and agreed to a settlement of their claims and cross-claims in the Action:

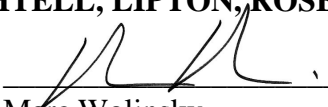
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, that:

1. All claims and cross-claims by the undersigned parties 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: June 5, 2019

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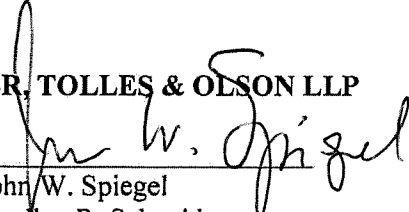
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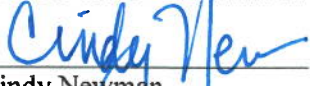
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