UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re·	•
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: Chapter 11

MOTORS LIQUIDATION COMPANY, et al., :

Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

(Jointly Administered)

Debtors. :

STIPULATION AND AGREED SCHEDULING ORDER REGARDING THE MOTION FOR LEAVE TO PURSUE CLAIMS AGAINST GENERAL MOTORS LLC, AND, ALTERNATIVELY, TO FILE A POST-BAR-DATE PROOF OF CLAIM IN THE MOTORS LIQUIDATION COMPANY BANKRUPTCY

General Motors LLC ("New GM"), the Motors Liquidation Company GUC Trust ("GUC Trust"), and Roger Dean Gillispie ("Mr. Gillispie," and collectively with New GM and the GUC Trust, the "Parties") respectfully submit this Stipulation and Agreed Scheduling Order regarding the briefing schedule for the Motion For Leave To Pursue Claims Against General Motors LLC, And, Alternatively, To File A Post-Bar-Date Proof Of Claim In The Motors Liquidation Company Bankruptcy, filed by Mr. Gillispie on June 17, 2014 [Dkt. 12727] ("Motion"):

1. In connection with the Motion, the Parties have agreed on the following briefing schedule:

Event	Agreed Date
New GM and the GUC Trust to file responses ("Responses") to the Motion	August 19, 2014
Mr. Gillispie to file a reply to the Responses	September 18, 2014
Hearing on Motion	Scheduled by the Court after briefing has concluded

2. This Stipulation is subject to approval by the Court. In the event the Court declines to approve this Stipulation, it shall be null and void, with no effect.

- 3. This Stipulation may be executed in counterparts, any of which may be transmitted by facsimile, and each of which shall be deemed an original.
- 4. The Parties each reserve the right to seek a continuance of any deadlines or dates set forth herein.

SO AGREED TO BY AND AMONG THE FOLLOWING:

/s/ Scott Davidson	/s/ Lisa H. Rubin
Arthur Steinberg	Lisa H. Rubin
Scott Davidson	GIBSON, DUNN & CUTCHER LLP
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212-556-2100	212 331 1000
212 330 2100	Attorneys for the Motors Liquidation
Attorneys for General Motors LLC	Company GUC Trust
Intomeys for General Motors LLC	Company GOC Trust
DATED:July 3, 2014_	DATED:July 3, 2014
<u></u>	<u> </u>
/s/ David B. Owens	
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Attorneys for Roger Dean Gillispie	
Timeeye je. Tieger Zeim Einispie	
DATED:July 3, 2014	
SO ORDERED.	
Dated: New York, New York	
July 7, 2014	
	s/Robert E. Gerber
	Honorable Robert E. Gerber
	United States Bankruptcy Judge