

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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 In re: : Chapter 11  
 :  
 MOTORS LIQUIDATION COMPANY, *et al.*, : Case No.: 09-50026 (REG)  
 f/k/a General Motors Corp., *et al.* :  
 : (Jointly Administered)  
 Debtors. :  
 -----X

**AMENDED 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 Amended 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 revised briefing schedule:

Event	Agreed Date
New GM and the GUC Trust to file responses (“ <b><u>Responses</u></b> ”) to the Motion	August 19, 2014
New GM to file a Reply (“ <b><u>New GM Reply</u></b> ”) to the GUC Trust Response	September 12, 2014
The GUC Trust to file a sur-reply (“ <b><u>GUC Trust Sur-reply</u></b> ”) to the New GM Reply	September 29, 2014
Mr. Gillispie to file a reply to the Responses, New GM Reply and GUC Trust Sur-reply	October 29, 2014

Hearing on Motion	Scheduled by the Court after briefing has concluded
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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  
Arthur Steinberg  
Scott Davidson  
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212-556-2100  
*Attorneys for General Motors LLC*

DATED: 9/12/14

/s/ Lisa H. Rubin  
Lisa H. Rubin  
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212-351-4000  
*Attorneys for Wilmington Trust Company, as Trustee  
for and Administrator of the Motors Liquidation  
Company General Unsecured Creditors Trust*

DATED: 9/12/14

/s/ David B. Owens  
David B. Owens  
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*Attorneys for Roger Dean Gillispie*

DATED: 9/12/14

**IT IS SO ORDERED.**

Dated: New York, New York  
September 12, 2014

s/ Robert E. Gerber  
Honorable Robert E. Gerber  
United States Bankruptcy Judge