

**BINDER & SCHWARTZ LLP**

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Company Avoidance Action Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a  
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)  
(Jointly Administered)

Debtors.

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**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON AUGUST 10, 2016 AT 2:00 PM (EDT)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, Courtroom 523, One Bowling Green, New York, NY  
10004-1408.

- I. Joint Motion of Motors Liquidation Company Avoidance Action Trust and Official Committee Of Unsecured Creditors for Entry of (A) Stipulation and Agreed Order (I) Settling Disputed Entitlements of Debtor-In-Possession Lenders and Official Committee of Unsecured Creditors to Potential Term Loan Avoidance Action Proceeds and (II) Modifying Avoidance Action Trust Agreement to Implement Settlement, and (B) Order (I) Approving Settlement of the Allocation Dispute, (II) Approving Amendments to the Avoidance Action Trust Agreement, and (III) Authorizing the Avoidance Action Trust to Grant a Lien to the DIP Lenders (the “**Joint Motion**”)
  - A. Notice of Hearing on Joint Motion [Bankr. Dkt. No. 13687]
  - B. Joint Motion (with Exhibits A through F) [Bankr. Dkt. No. 13688]
  - C. Declaration of Arthur J. Gonzalez in Support of Joint Motion [Bankr. Dkt. 13689]

- D. Limited Objection to the Joint Motion of the Avoidance Action Trust and Committee for, Among Other Things, an Order Approving the Settlement of the Allocation Dispute, Including the Litigation Cost Advance Agreement, filed by River Birch Capital LLC [Bankr. Dkt. 13701]
- E. Objection of Davidson Kempner Capital Management LP to the Joint Motion [Bankr. Dkt. 13704]
- F. United States' Statement in Response to Objection to Joint Motion of MLC Avoidance Action Trust and Official Committee of Unsecured Creditors for Entry of Stipulation and Agreed Order Settling Disputed Entitlements of Debtor-in-Possession Lenders and Official Committee of Unsecured Creditors, and Related Relief [Bankr. Dkt. 13713]
- G. Reply of Motors Liquidation Company Avoidance Action Trust to River Birch Capital LLC's Limited Objection to the Joint Motion [Bankr. Dkt. 13714]
- H. Reply of Motors Liquidation Company Avoidance Action Trust to Davidson Kempner Capital Management LP's Objection to the Joint Motion [Bankr. Dkt. 13715]
- I. Joinder of Export Development Canada to United States' Response (A) in Further Support of Joint Motion of MLC Avoidance Action Trust and Official Committee of Unsecured Creditors for Entry of Stipulation and Agreed Order Settling Disputed Entitlements of Debtor-in-Possession Lenders and Official Committee of Unsecured Creditors and (B) in Response to Objections Interposed by River Birch and Davidson Kempner [Bankr. Dkt. 13716]
- J. Omnibus Reply of the Official Committee of Unsecured Creditors to Objections to Joint Motion [Bankr. Dkt. 13717]
- K. Declaration of Thomas Moers Mayer in Support of the Joint Motion and Reply in Response to Objections to the Motion [Bankr. Dkt. 13718]
- L. Order Re Hearing on Joint Motion Seeking Approval of Settlement of Allocation Dispute and Approval of Funding Agreement [Bankr. Dkt. 13721]

Dated: August 9, 2016  
New York, New York

Respectfully submitted,

**BINDER & SCHWARTZ LLP**

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