

Barry N. Seidel
Eric B. Fisher
Evan J. Zucker
DICKSTEIN SHAPIRO LLP
1633 Broadway
New York, New York 10019-6708
Telephone: (212) 277-6500
Facsimile: (212) 277-6501

Jeffrey Rhodes (*admitted pro hac vice*)
DICKSTEIN SHAPIRO LLP
1825 Eye Street, NW
Washington, D.C. 20006
Telephone: (202) 420-3150

Attorneys for Plaintiff

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

-----X

In re:

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

Chapter 11

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

Debtors.

-----X

MOTORS LIQUIDATION COMPANY AVOIDANCE
ACTION TRUST, by and through the Wilmington Trust
Company, solely in its capacity as Trust Administrator and
Trustee,

Plaintiff,

Adversary Proceeding
Case No. 09-00504 (REG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.

-----X

**STIPULATION AND ORDER EXTENDING TIME TO
RESPOND TO FIRST AMENDED ADVERSARY COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the time by which **Canadian Imperial Bank of Commerce** must move, answer or otherwise respond to the *First Amended Adversary Complaint for (1) Avoidance of Unperfected Lien, (2) Avoidance and Recovery of Postpetition Transfers, (3) Avoidance and Recovery of Preferential Payments, and (4) Disallowance of Claims by Defendants* [Docket No. 91] in the above-captioned adversary proceeding is hereby extended to and including November 30, 2015.

Dated: New York, New York
November 9, 2015

New York, New York
November 9, 2015

DICKSTEIN SHAPIRO LLP

DENTONS US LLP

/s/ Evan J. Zucker

/s/ Gary W. Marsh

Barry N. Seidel, Esq.
Eric B. Fisher, Esq.
Evan J. Zucker Esq.
DICKSTEIN SHAPIRO LLP
1633 Broadway
New York, New York 10019
Tel: 212-277-6500
Fax: 212-277-6501

Gary W. Marsh, Esq.
303 Peachtree Street, NE, Suite 5300
Atlanta, GA 30308-3265
Tel: (404) 527-4150

*Attorneys for Canadian Imperial Bank of
Commerce*

Attorneys for Plaintiff

SO ORDERED

Dated: New York, New York
November ____, 2015

United States Bankruptcy Judge