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the Motors Liquidation Company GUC Trust

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

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In re	: Chapter 11 Case No.
	:
MOTORS LIQUIDATION COMPANY, et al.,	: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	
	:
JOHN MORGENSTEIN, MICHAEL JACOB,	:
as Executor of the Estate of Doris Jacob,	:
and ALANTE CARPENTER individually	:
and on behalf of all others similarly situated,	:
	:
Plaintiffs,	:
	:
v.	: Adversary Proceeding No. 11-09409
	:
MOTORS LIQUIDATION COMPANY	:
f/k/a GENERAL MOTORS CORPORATION	:
a Delaware Corporation,	:
	:
Defendant.	:
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**STIPULATION AND AGREED ORDER BY AND AMONG MOTORS LIQUIDATION
COMPANY, MOTORS LIQUIDATION COMPANY GUC TRUST, JOHN
MORGENSTEIN, MICHAEL JACOB, AND ALANTE CARPENTER ESTABLISHING
BRIEFING SCHEDULE FOR MOTORS LIQUIDATION COMPANY'S AND MOTORS
LIQUIDATION COMPANY GUC TRUST'S AMENDED MOTION TO DISMISS
PLAINTIFFS' COMPLAINT FOR REVOCATION OF DISCHARGE
AND, IN THE ALTERNATIVE, MOTION TO STRIKE CLASS ALLEGATIONS**

Motors Liquidation Company and the Motors Liquidation Company GUC Trust (the “**GUC Trust**,” and together with Motors Liquidation Company, “**MLC**”), on the one hand, and John Morgenstein, Michael Jacob, and Alante Carpenter, on the other hand (“**Plaintiffs**,” and together with MLC, the “**Parties**”), by and through their undersigned counsel, hereby enter into this Stipulation and Agreed Order (this “**Stipulation and Order**”) and stipulate as follows:

RECITALS

1. On September 26, 2011, Plaintiffs filed their Complaint for Revocation of Discharge (the “**Complaint**”);
2. On October 28, 2011 MLC filed its Motion to Dismiss Plaintiffs’ Complaint for Revocation of Discharge and, in the Alternative, Motion to Dismiss Class Allegations (the “**Motion**”);
3. On November 22, 2011, the Court held a status conference on this action, at which the Court permitted the Parties to submit an agreed briefing schedule should MLC chose to amend its Motion (“**Amended Motion**”);
4. MLC intends to file an Amended Motion, necessitating an extension of the present briefing deadlines;

NOW, THEREFORE, the Parties, by and through their undersigned counsel, agree to the following briefing deadlines and hearing date with respect to the Amended Motion:

STIPULATION

1. MLC shall file its Amended Motion on or before 4:00 p.m. ET on December 12, 2011.
2. Plaintiffs shall file their response to the Amended Motion on or before 4:00 p.m. ET on December 26, 2011.

3. MLC shall file its reply in support of the Amended Motion on or before 4:00 p.m. ET on January 3, 2012.

4. The hearing on the Amended Motion shall occur on January 10, 2012, at 9:45 a.m. ET.

Dated: December 7, 2011

/s/ Mark Schlachet

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**ATTORNEYS FOR JOHN
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ALANTE CARPENTER**

IT IS SO ORDERED.

Dated: New York, New York
December 12, 2011

s/ Robert E. Gerber
THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE