

Hearing Date: TBD
Objection Deadline: January 20, 2016
Reply Deadline: February 15, 2016

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Counsel for Ad Hoc Group of Term Lenders

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

-----	x	Chapter 11
	:	
<i>In re:</i>	:	
	:	Case No. 09-50026 (REG)
MOTORS LIQUIDATION COMPANY, et al.,	:	(Jointly Administered)
	:	
Debtors.	:	
	:	
-----	x	
MOTORS LIQUIDATION COMPANY AVOIDANCE	:	
ACTION TRUST, by and through the Wilmington	:	
Trust Company, solely in its capacity as Trust	:	Adversary Proceeding
Administrator and Trustee,	:	No. 09-00504 (REG)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A. <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
-----	x	

**NOTICE OF HEARING ON MOTION OF AD HOC GROUP OF TERM LENDERS
(1) TO VACATE CERTAIN PRIOR ORDERS OF THE COURT;
AND (2) TO DISMISS THE ADVERSARY PROCEEDING**

PLEASE TAKE NOTICE that a hearing to consider the relief requested in the Motion of Ad Hoc Group of Term Lenders (1) to Vacate Certain Prior Orders of the Court; and (2) to Dismiss the Adversary Proceeding (the “**Motion**”) filed by the Ad Hoc Group of Term Lenders¹ (the “**Moving Term Lenders**”), shall be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 523, One Bowling Green, New York, New York 10004 (the “**Bankruptcy Court**”), on a date to be determined by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion and the relief requested therein shall be made in writing, shall state with particularity the grounds therefore, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User’s Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court’s case filing system, and by all other parties in interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and served in accordance with General Order M-399 or otherwise **so as to be actually received no later than January 20, 2016** by: (i) Kasowitz, Benson, Torres & Friedman LLP, attorneys for the Term Lenders, 1633 Broadway, New York, New York 10019 (Attn: Marc E. Kasowitz, Esq., and Andrew K. Glenn, Esq.).

¹ A full list of the Ad Hoc Group of Term Lenders is set forth on Appendix A hereto.

PLEASE TAKE FURTHER NOTICE THAT the relief requested in the Motion may
be granted without a hearing if no objection is timely filed and served as set forth above.

Dated: November 19, 2015
New York, New York

By: /s/ Andrew K. Glenn
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Counsel for Ad Hoc Group of Term Lenders

Appendix A

Blackrock California State Teachers Retirement System
Blackrock Corporate High Yield Fund, Inc.
Blackrock Corporate High Yield Fund III, Inc.
Blackrock Corporate High Yield Fund V, Inc.,
Blackrock Corporate High Yield Fund VI, Inc.
Blackrock Debt Strategies Fund, Inc.
Blackrock Diversified Income Strategies Fund, Inc.
Blackrock Employees' Retirement Fund of the City of Dallas
Blackrock Floating Rate Income Strategies Fund Inc.
Blackrock Funds High Yield Bond Portfolio
Blackrock Funds II - High Yield Bond Portfolio
Blackrock Global Investment Series: Income Strategies Portfolio
Blackrock GSAM Goldman Core Plus Fixed Income Fund
Blackrock High Incm Fund of Blackrock Bond Fund Inc.
Blackrock High Income Shares
Blackrock-Lockheed Martin Corp Master Retirement Trust
Blackrock High Yield Trust
Blackrock Managed Account Series High Income Portfolio
Blackrock MET Investor Series TR High Yield Portfolio
Blackrock Multi Strategy Sub-Trust C
Blackrock Senior High Income Fund, Inc.
Blackrock Senior Income Series II
Blackrock Senior Income Series IV
Blackrock Strategic Bond Trust
R3 Capital Partners Master LP
The Galaxite Master Unit Trust
Employees' Retirement Fund of the City of Dallas
California State Teachers' Retirement System
BlackRock Corporate High Yield Fund IV, Inc.
Corporate High Yield Fund V, Inc.
BlackRock Diversified Income Strategies Portfolio, Inc.
BlackRock High Yield Portfolio of BlackRock Series Fund, Inc.
BlackRock Funds II, High Yield Bond Portfolio
BGIS Income Strategies Portfolio
BlackRock High Income Fund
Lockheed Martin High Yield Portfolio
Managed Account Series: High Income Portfolio
R3 Capital Partners Master - Cayman Trading Portfolio
Galaxite - Citi Prime Brokerage Account
Fundamental Core PLUS Portfolio
LGT Multi Manager Bond High Yield
NEXCOM High Yield
MIST BlackRock High Yield Portfolio
ULTRA-HY

PNC Pension High Yield Portfolio
MOSERS Credit Opportunities- Bank Loan Portfolio
Missouri State Employees Retirement System (MOSERS)
Fortress Credit Investments I Ltd.
Fortress Credit Investments II Ltd.
Drawbridge Special Opportunities Fund LP
Drawbridge Special Opportunities Fund Ltd.
Taconic Capital Partners 1 5 LP
Taconic Capital Partners 1.5 LP
Taconic Market Dislocation Fund II LP
Taconic Market Dislocation Master Fund II LP
Taconic Opportunity Fund LP
Solus Core Opportunities Master Fund Ltd.
Solus Core Opportunities Master Fund
Sola Ltd.
Ultra Master Ltd
Mason Capital, L.P.
Mason Capital, Ltd.
Thrivent Financial for Lutherans
Thrivent High Yield Fund
Thrivent High Yield Portfolio
Thrivent Income Fund
Thrivent Series Fund, Inc. - Income Portfolio
Delaware LVIP Delaware Bond Fund
L3-Lincoln Variable Insurance Products Trust Managed Fund
Lincoln National Life Insurance Company Separate Account 12
Lincoln National Life WSA20
LVIP Delaware Bond Fund, a series of Lincoln Variable Insurance Products Trust
LVIP Delaware Foundation® Conservative Allocation Fund, a series of Lincoln Variable Insurance Products Trust
The Lincoln National Life Insurance Company Separate Account 12
The Lincoln National Life Insurance Company Separate Account 20
Freescale Semiconductor, Inc.
Freescale Semiconductor Inc., Retirement Savings
PIMCO 1464-Freescale Semiconductor Inc
PIMCO 1641-Sierra Pacific Resources
PIMCO Fairway Loan Funding Company
PIMCO2244 - Virginia Retirement System
PIMCO2496-FLTG RT INC FD
PIMCO2497-FLTG RT STRT FD
PIMCO2603 - Red River HYPI LP
PIMCO3813 - PIMCO Cayman Bank Loan Fund
PIMCO400-Stocks Plus Sub Fund B LLC
PIMCO6819 Portola CLO LTD.
PIMCO700-FD TOT RTN FD
PIMCO706-Private High Yield Portfolio

Mayport CLO Ltd.
Global Investment Grade Credit Fund
Portola CLO Ltd.
Golden Knight II CLO, Ltd.
NV Energy, Inc. Master Defined Benefit Trust
Fairway Loan Funding Company – CDO
Virginia Retirement System
PIMCO Income Strategy Fund (PFL)
PIMCO Income Strategy Fund II (PFN)
Red River HYPi, L.P.
PIMCO Cayman Bank Loan Fund (USD)
PIMCO StockPLUS LP Fund B
Portola CLO, Ltd.
PIMCO Total Return Fund
PAPS High Yield Portfolio
Mayport CLO, Ltd.
GIS Global Investment Grade Credit Fund
Hewlett-Packard Company
Hewlett-Packard Company Master Trust
Illinois Teachers Retirement System
Lord Abbett Inv Trst-LA HI YLD
Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund
Lord Abbett & Co - Teachers Re
Lord Abbett Investment Trust - Lord Abbett High Yield Fund
Lord Abbett Investment Trust - Lord Abbett Floating Rate Fund
Lord Abbett managed account for Teachers' Retirement System of Oklahoma
MacKay 8067 - Fire & Police Employee Retirement System of the City of Baltimore
Fire & Police Employees' Retirement System of the City of Baltimore
Putnam 29x-Funds Trust Floating Rate Income Fund
Delaware Delchester Fund
Delaware Diversified Income Fund
Delaware Diversified Income Trust
Delaware Enhanced Global Dividend & Income Fund
Delaware Extended Duration Bond Fund
Delaware Group Equity V Inc. Dividend Income Fund
Delaware Group Government Fund Core Plus Fund
Delaware Group Inc. Fund Inc. Corporate Bond Fund
Delaware Group Income Funds - Delaware High Yield Opportunities Fund
Delaware Investments Dividend & Income Fund Inc.
Delaware Investments Global Dividend & Income Fund
Delaware Optimum Fixed Income Fund
Delaware Pooled Trust - Core Plus Fixed Income Portfolio
Delaware Pooled Trust - High Yield Bond Portfolio
Delaware VIP Trust Diversified Income Series
Delaware VIP Trust High Yield Series
Delaware Delchester Fund, a series of Delaware Group Income Funds

Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds
Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds
Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V
Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund
Delaware Corporate Bond Fund, a series of Delaware Group Income Funds
Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds
Delaware Investments Global Dividend and Income Fund, Inc.
Optimum Fixed Income Fund, a series of Optimum Fund Trust
The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust
The High-Yield Bond Portfolio, a series of Delaware Pooled Trust
Delaware VIP Diversified Income Series, a series of Delaware VIP Trust
Delaware VIP High-Yield Series, a series of Delaware VIP Trust
MacKay New York Life Insurance Company (Guaranteed Products)
New York Life Insurance Company Guaranteed Products
New York Life Insurance Company (Guaranteed Products)
New York Life Insurance GP - Portable Alpha
MacKay Shields Core Plus Alpha Fund Ltd.
Arnhold-Houston Police Officers' Pension System
MacKay-Houston Police Officers Pension System
Plumbers & Pipefitters National Pension Fund
Russell Strategic Bond Fund
Logan Circle - Russell Inst Funds LLC - Russell Core Bond
Logan Circle - Russell Investment Company PLC
Logan Circle - Russell Multi-Managed Bond Fund
Logan Circle - Russell Strategic Bond Fund
Russell Investment Company Russell Strategic Bond Fund
Russell Inst Funds LLC Russell Core Bond Fund
Russell Investment Company PLC The Global Strategic Yield Fund
*Russell Investment Company PLC The Global Strategic Yield Fund on behalf of DDJ – Multi-
Style, Multi-Manager Funds PLC – Global Strategic Fund*
Russell Trust Company Russell Multi-Managed Bond Fund
Russell Investment Company Russell Strategic Bond Fund
Russell Inst Funds LLC - Russell Core Bond Fund
WAMCO 3073 - John Hancock Trust Floating Rate Income Trust,
WAMCO 3074 - John Hancock Fund II Floating Rate Income Fund
John Hancock Trust Floating Rate Income Trust
John Hancock II - Floating Rate Income Fund
John Hancock Variable Insurance Trust - Floating Rate Income Trust
John Hancock Funds II - Floating Rate Income Fund
John Hancock Variable Insurance Trust - U.S. High Yield Bond Trust
John Hancock Funds II - U.S. High Yield Bond Fund
Wells Capital Management 16959700
JHVIT U.S. High Yield Bond Trust
Wells Capital Management 16959701
JHF II U.S. High Yield Bond Fund
Lehman Brothers First Trust Income Opportunity Fund

Lehman Brothers High Income Bond Fund
Neuberger Berman High Income Bond Fund
Lehman Brothers High Income Trust Opportunity Fund
Lehman-Neuberger Berman-High Income Bond Fund
Neuberger Berman High Yield Strategies Fund Inc.
Neuberger Berman High Yield Strategies Fund
Neuberger Berman Income Funds - Neuberger Berman High Income Bond Fund
Neuberger Berman Income Opportunity Fund, Inc.
Guggenheim Portfolio CO X LLC
Guggenheim Portfolio Company X, LLC
Security Investors - Security Income Fund - High Yield Series
Guggenheim High Yield Fund
Commonwealth Virginia and the Virginia Retirement System
WAMCO 3023 - Virginia Retirement Systems Bank Loan Portfolio
WAMCO 176 - Virginia Supplemental Retirement System
Cap Fund, L.P.
BBT Master Fund, L.P.
BBT Fund, L.P.
SRI Fund, L.P.
Wells Capital Management 16017000
North Dakota State Investment Board