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(iv) Phoenix Edge Series Fund Phoenix Multi  
Sector Short Term Bond Series, and (v) Phoenix  
Edge SRS-Multi-Sector Fixed Income Series*

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

In re:

MOTORS LIQUIDATION COMPANY, *et. al.*

Chapter 11 Case

Case No. 09-50026 (REG)

(Jointly Administered)

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

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A., individually  
and as Administrative Agent for Various lenders  
party to the Term Loan Agreement described  
herein, et al.,

Defendants.

Adv. Pro. No. 09-00504 (REG)

**NOTICE OF HEARING ON DEFENDANTS' MOTION FOR AN ORDER PURSUANT  
TO RULE 12(C) OF THE FEDERAL RULES OF CIVIL PROCEDURE MADE  
APPLICABLE TO THIS ADVERSARY PROCEEDING BY RULE 7012(C) OF THE**

**FEDERAL RULES OF BANKRUPTCY PROCEDURE ENTERING JUDGMENT IN  
FAVOR OF DEFENDANTS AND DISMISSING THE COMPLAINT**

**PLEASE TAKE NOTICE** that a hearing to consider the relief requested in the Motion for Judgment on the Pleadings, filed by the Defendants on January 27, 2016, shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 501, 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 any responses or objections to this Motion must be made in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), with a hard copy delivered directly to Chambers, in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on the Defendants’ attorneys, Klestadt Winters Jureller Southard & Stevens, LLP, 200 West 41<sup>st</sup> Street, 17<sup>th</sup> Floor, New York, New York 10036 (Attn: Brendan M. Scott), so as to be received no later than March 4, 2016 (the “Objection Deadline”), as outlined in the Stipulated Scheduling Order (Dkt. No. 341).

**PLEASE TAKE FURTHER NOTICE** that if no objections are timely filed and served with respect to the Motion, the Defendants may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order submitted with the

Motion, which order may be signed and entered with no further notice or opportunity to be heard.

Dated: New York, New York  
January 27, 2016

KLESTADT WINTERS JURELLER  
SOUTHARD & STEVENS, LLP

*By: /s/ Brendan M. Scott*  
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