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

| | | |
|---|---|---|
| In re: | : | Chapter 11 |
| MOTORS LIQUIDATION COMPANY, *et al.*, | : | Case No.: 09-50026 (REG) |
| Debtors. | : | 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, | : | Adv. Pro. No. 09-00504 (REG) |
| -against- | : | |
| JPMORGAN CHASE BANK, N.A., *et al.*, | : | |
| Defendants. | : | |

**JOINDER OF ALTICOR INC. IN REPLY IN SUPPORT OF CERTAIN TERM LENDERS' RULE 12 MOTIONS**

Defendant Alticor Inc. ("**Alticor**"), by and through its undersigned counsel, hereby joins in the *Reply In Support Of Certain Term Lenders' Rule 12 Motions* (the "**Term Lenders' Reply**") in its entirety. Alticor adopts the arguments set forth in the Term Lenders' Reply in the above pleadings as if the same were set forth fully herein. Alticor's joinder in the Term Lenders' Reply applies regardless of whether any of the underlying motions are settled, withdrawn, or otherwise resolved.[1]

Dated: March 30, 2016

/s/ Gordon J. Toering

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[1] Alticor previously joined in *Certain Term Loan Investor Defendants' Joint Motion to Dismiss Plaintiff's Amended Complaint* [Dkt. No. 226] and accompanying *Memorandum of Law* [Dkt. No. 226-1]; and *Motion of Ad Hoc Group of Term Lenders (1) to Vacate Certain Prior Orders of the Court; and (2) To Dismiss the Adversary Proceeding* [Dkt. No. 262]. *See* Dkt. No. 281.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of March, 2016, a copy of the foregoing Reply was served via the Court's CM/ECF system on all subscribed parties.

/s/ Gordon J. Toering
Gordon J. Toering