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Attorneys for Plaintiff

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

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In re:

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

Chapter 11

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

Debtors.

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

Adversary Proceeding

Plaintiff,

Case No. 09-00504 (MG)

against

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

Defendants.
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**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO ANSWER AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, that the time by which **Fairview Funding LLC** must answer 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 further extended to and including May 18, 2016.

Dated: New York, New York
May 10, 2016

New York, New York
May 10, 2016

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GIORDANO, HALLERAN & CIESLA, P.C.

/s/Eric B. Fisher

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*Attorneys for Plaintiff Motors Liquidation
Company Avoidance Action Trust*

Attorneys for Defendant Fairview Funding LLC

SO ORDERED

Dated: New York, New York
May ___, 2016

Martin Glenn
United States Bankruptcy Judge