

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

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

**STIPULATION AND [PROPOSED] ORDER VACATING CERTIFICATES OF
DEFAULT AND EXTENDING TIME TO ANSWER AMENDED COMPLAINT**

WHEREAS, on April 26, 2016, the Plaintiff filed an application for certificates of default against several defendants in the above-captioned adversary proceeding (“Action”), including against “Raytheon MPT-Logan Floating Rate Portfolio”, “WAMCO 3131 Raytheon Master Pension Master Trust”, and “Raytheon MPT-Logan Mid Grade Portfolio” (“Raytheon Defendants”) [Adv. Proc. Doc. No. 503];

WHEREAS, on May 4, 2016, the Clerk of the Court filed certificates of default against each of the Raytheon Defendants [Adv. Proc. Docket Nos. 527, 528 and 544, respectively] (“Certificates of Default”); and

WHEREAS, the Plaintiff and the Raytheon Defendants agree that the Certificates of Default should be vacated.

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Certificates of Default are vacated as to Defendants Raytheon MPT-Logan Floating Rate Portfolio, WAMCO 3131 Raytheon Master Pension Master Trust, and Raytheon MPT-Logan Mid Grade Portfolio.

2. The date by which the Raytheon Defendants 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 [Adv. Proc. Doc. No. 91] in the Action is hereby extended July 27, 2016.

3. The Raytheon Defendants and the Plaintiff expressly reserve and preserve any and all rights, claims, interests and defenses they each may have in connection with or related to the Action.

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Dated: New York, New York
July 14, 2016

Respectfully submitted,

HAHN & HESSEN LLP

By: /s/ Mark T. Power

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Attorneys for Plaintiff

IT IS SO ORDERED:

Dated: New York, New York
July __, 2016

MARTIN GLENN
United States Bankruptcy Judge