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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 (MG)
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 (MG)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
JPMORGAN CHASE BANK, N.A. <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	x	

**NOTICE OF MOTION OF AD HOC GROUP OF
 TERM LENDERS FOR LEAVE TO APPEAL PURSUANT TO
 28 USC § 158(a) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 8004**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Andrew K. Glenn and the exhibits attached thereto, the Ad Hoc Group of Term Lenders,¹ by and through its attorneys Kasowitz, Benson, Torres & Friedman, hereby moves the District Court for an order, pursuant to 28 U.S.C. § 158(a) and Federal Rule of Bankruptcy Procedure 8004, to grant leave to appeal the United States Bankruptcy Court for the Southern District of New York's *Memorandum Opinion and Order Denying Motions to Dismiss, For Judgment on the Pleadings, and to Vacate Prior Court Orders*, dated June 30, 2016, in the above-captioned adversary proceeding.

Dated: July 14, 2016
New York, New York

Respectfully submitted,

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

By: /s/ Andrew K. Glenn
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*Counsel for Ad Hoc Group of Term Lenders
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¹ A complete list of the Ad Hoc Group of Term Lenders is attached hereto as Appendix A.

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Attorneys for Plaintiff

Appendix A

*Fire and Police Employees' Retirement System of the City of Baltimore
BBT Fund, L.P.
SRI Fund, L.P.
BBT Master Fund, L.P. (f/k/a Cap Fund, L.P.)
BlackRock Corporate High Yield Fund, Inc.
BlackRock Debt Strategies Fund, Inc.
BlackRock Floating Rate Income Strategies Fund, Inc.
BlackRock Funds II - High Yield Bond Portfolio
BlackRock Global Investment Series: Income Strategies Portfolio
BlackRock Fixed Income Portable Alpha (Offshore) Fund
BlackRock Senior Income Series II
BlackRock Senior Income Series IV
R3 Capital Partners Master, L.P.
The Galaxite Master Unit Trust
BlackRock High Yield Bond Portfolio, a series of BlackRock Funds II
High Yield Bond Portfolio
California State Teachers' Retirement System
Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds
Delaware Enhanced Global Dividend and Income Fund
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 Dividend and Income Fund, Inc.
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
The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust
Optimum Fixed Income Fund, a series of Optimum Fund Trust
Drawbridge Special Opportunities Fund Ltd.
Drawbridge Special Opportunities Fund LP
Fortress Credit Investments I Ltd.
Fortress Credit Investments II Ltd.
FOUR CORNERS CLO II, LTD.
FOUR CORNERS CLO III, LTD.
Freescale Semiconductor Inc., 401(k) Retirement Savings Plan
GENESIS CLO 2007-1 LTD.
Guggenheim Portfolio X, LLC
Guggenheim High Yield Fund
Illinois Municipal Retirement Fund
John Hancock Variable Insurance Trust Floating Rate Income Trust
John Hancock Variable Insurance Trust High Yield Trust
John Hancock Funds II Floating Rate Income Fund*

John Hancock Funds II High Yield Bond Fund
The Lincoln National Life Insurance Company Separate Account 12
The Lincoln National Life Insurance Company Separate Account 20
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 (and the successor to LVIP Delaware Managed Fund as of June 15,
2009).
Golden Knight II CLO, Ltd.
Lord Abbett Investment Trust – Lord Abbett High Yield Fund
Lord Abbett Investment Trust – Lord Abbett Floating Rate Fund
Teachers’ Retirement System of Oklahoma
Houston Police Officers’ Pension System
Mason Capital, L.P.
Mason Capital, Ltd.
The Missouri State Employees’ Retirement System
Neuberger Berman High Income Bond Fund
Neuberger Berman High Yield Strategies Fund Inc.
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 Company GP - Portable Alpha
MacKay Shields Core Plus Alpha Fund Ltd.
New York Life Insurance Company
North Dakota State Investment Board
Fairway Loan Funding Company
PIMCO Income Strategy Fund
PIMCO Income Strategy Fund II
Red River HYPi, L.P.
PIMCO Cayman Trust: PIMCO Cayman Bank Loan Fund
StocksPLUS, L.P. Fund B
PIMCO Funds: PIMCO Total Return Fund
PIMCO Funds: Private Account Portfolio Series High Yield Portfolio
PIMCO Funds: Global Investors Series plc, Global Investment Grade Credit Fund
Portola CLO, Ltd.
Mayport CLO, Ltd.
Plumbers & Pipefitters National Pension Fund
Putnam 29X-Funds Trust Floating Rate Income Fund
SHIPROCK FINANCE, SPC, on behalf of SF-3 Segregated Portfolio
Russell Investment Company plc on behalf of its sub-fund The Global Strategic Yield Fund, and
its successor funds, and Multi-Style, Multi-Manager Fund plc on behalf of its sub-fund, The
Global Strategic Yield Fund
Russell Institutional Funds LLC Russell Core Bond Fund
Russell Trust Company Russell Multi-Manager Bond Fund
Russell Investment Company Russell Strategic Bond Fund
Russell Investment Company plc Russell U.S. Bond Fund
Solus Core Opportunities Master Fund Ltd

Sola Ltd

Ultra Master Ltd

Taconic Capital Partners 1.5 L.P.

Taconic Market Dislocation Fund II L.P.

Taconic Market Dislocation Master Fund II L.P.

Taconic Opportunity Fund L.P.

Thrivent Financial for Lutherans

Thrivent High Yield Fund, a series of Thrivent Mutual Funds

Thrivent Income Fund, a series of Thrivent Mutual Funds

Thrivent High Yield Portfolio, a series of Thrivent Series Fund, Inc.

Thrivent Income Portfolio, a series of Thrivent Series Fund, Inc.

Virginia Retirement System