

**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 “Oaktree – Employees Retirement Funds of the City of Dallas”, which is intended to be the Dallas Employee Retirement Fund (“DERF”) [Adv. Proc. Doc. No. 503];

WHEREAS, on May 4, 2016, the Clerk of the Court filed a certificate of default against DERF [Adv. Proc. Docket No. 540] (“Certificate of Default”); and

WHEREAS, the Plaintiff and the DERF agree that the Certificate of Default should be vacated.

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Certificate of Default is vacated as to Defendant “Oaktree – Employees Retirement Funds of the City of Dallas”.
2. The date by which DERF 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 to September 30, 2016.
3. DERF 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  
September 13, 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  
September \_\_, 2016

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MARTIN GLENN  
United States Bankruptcy Judge