

**Hearing Date and Time:  
November 17, 2016 10 a.m. EST**

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*Attorneys for the BlackRock Funds\**

[\*complete list of represented Defendants listed in Appendix A to Adv. Proc. Docket No. 670]

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

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<i>In re:</i>	:
	:
	: Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:
	: 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
	: No. 09-00504 (MG)
Plaintiff,	:
	:
-against-	:
	:
JPMORGAN CHASE BANK, N.A. et al.,	:
	:
Defendants.	:

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**JOINDER OF THE BLACKROCK FUNDS TO THE BRIEF OF THE  
MOVING TERM LENDERS, IN REPONSES TO ORDER GRANTING  
RECONSIDERATION OF MOTION FOR LEAVE TO FILE CORPORATE  
OWNERSHIP STATEMENTS UNDER SEAL**

In response to the Court's September 22, 2016 *Order to Show Cause Why the BlackRock Funds' Rule 7007.1 Disclosure Should Not Be Filed in Unredacted Form* [Adv. Proc. Docket No. 734] Defendants BlackRock Corporate High Yield Fund, Inc. (named in the First Amended Complaint [Adv. Proc. Docket No. 90] (the "Amended Complaint") as BlackRock Corporate High Yield Fund, Inc., BlackRock Corporate High Yield Fund III, Inc., BlackRock Corporate High Yield Fund V, Inc., and BlackRock Corporate High Yield Fund VI, Inc.), BlackRock Debt Strategies Fund, Inc. (named in the Amended Complaint as BlackRock Debt Strategies Fund, Inc., BlackRock Senior High Income Fund, Inc., and BlackRock Strategic Bond Trust), BlackRock Floating Rate Income Strategies Fund, Inc. (named in the Amended Complaint as BlackRock Floating Rate Income Strategies Fund, Inc. and BlackRock Diversified Income Strategies Fund, Inc.), BlackRock High Yield Bond Portfolio, a series of BlackRock Funds II (named in the Amended Complaint as BlackRock Funds High Yield Bond Portfolio and BlackRock High Income Fund of BlackRockbond Fund Inc.), BlackRock Global Investment Series: Income Strategies Portfolio, BlackRock Corporate High Yield Fund, Inc. (named in the Amended Complaint as BlackRock High Income Shares and BlackRock High Yield Trust), High Yield Bond Portfolio (named in the Amended Complaint as BlackRock Managed Account Series High Income Portfolio), BlackRock Fixed Income Portable Alpha (Offshore) Fund (named in the Amended Complaint as BlackRock Multi Strategy Sub-Trust C), R3 Capital Partners Master, L.P., BlackRock Senior Income Series IV, The Galaxite Master Unit Trust, BlackRock Funds II - High Yield Bond Portfolio, and BlackRock Senior Income Series II (collectively, the "BlackRock Funds"), by and through their undersigned counsel, hereby join in, and adopt the same as if fully set forth herein, the *Brief of the Moving Term Loan Lenders, in Response to Order Granting Reconsideration of Motion for Leave to File Corporate Ownership Statement*

*Under Seal*, filed on the date hereof [Adv. Proc. Docket No. 774] (the “Reconsideration Brief”).

The BlackRock Funds incorporate all of the arguments in the Reconsideration Brief as if made independently herein.

WHEREFORE, the BlackRock Funds respectfully request that the Court allow the BlackRock Funds’ Corporate Ownership Statement to remain filed under seal.

Dated: New York, New York  
November 9, 2016

Respectfully submitted,

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

By: /s/ Andrew K. Glenn  
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