

KELLEY DRYE & WARREN LLP

John M. Callagy

Nicholas J. Panarella

Martin A. Krolewski

101 Park Avenue

New York, New York 10178

Telephone: (212) 808-7800

Attorneys for Defendant and Appellee JPMorgan Chase Bank, N.A.

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

In re:	:	Chapter 11 Case
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	:	
OFFICIAL COMMITTEE OF UNSECURED	:	Adversary Proceeding
CREDITORS OF MOTORS LIQUIDATION COMPANY	:	
f/k/a GENERAL MOTORS CORPORATION,	:	Case No. 09-00504 (REG)
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
	:	
	:	
	:	

**DESIGNATION OF DEFENDANT JPMORGAN CHASE BANK, N.A.
AS APPELLEE OF ADDITIONAL ITEMS TO BE
INCLUDED IN THE RECORD TO BE PRESENTED ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Defendant
JPMorgan Chase Bank, N.A., as appellee (“JPMCB” or “Appellee”), respectfully submits the

following designation of additional items (the “Additional Designated Items”) to be included in the record on appeal of the Official Committee of Unsecured Creditors of Motors Liquidation Company (the “Appellant”) appeal of the Bankruptcy Court’s Order on Cross Motions for Summary Judgment [Docket No. 72] and Judgment [Docket No. 73] entered in this adversary proceeding on March 1, 2013. Appellee requests that the Additional Designated Items be included in the record to be presented on appeal in addition to the items designated by Appellant in its designation of items to be included in the record on appeal [Docket No. 77], submitted on March 21, 2013.

ADDITIONAL DESIGNATED ITEMS

Case No. 09-50026 (REG)¹			
Item	Date	Docket No.	Description
1	06/25/2009	2529	Final Order Signed on 6/25/2009, (A) Approving a DIP Credit Facility and Authorizing the Debtors to Obtain Post-Petition Financing Pursuant Thereto, (B) Granting Related Liens and Super-Priority Status, (C) Authorizing the Use of Cash Collateral and (D) Granting Adequate Protection to Certain Pre-Petition Secured Parties.

¹ To the extent any of the below listed documents contain exhibits or other attachments that are not otherwise designated, all such exhibits and attachments are included in this designation.

Adversary Case No. 09-00504 (REG)			
Item	Date	Docket No.	Description
2	10/06/2009	10	So Ordered Stipulation Signed on 10/6/2009 re: Scheduling Discovery.
3	01/20/2010	17	So Ordered Stipulation Signed on 1/20/2010 Between Attorneys for Official Committee of Unsecured Creditors of Motors Liquidation Company f/k/a General Motors Corporation and Attorneys for JPMorgan Chase Bank, N.A. Requesting Modification of Stipulation Scheduling Order.

Dated: New York, New York
April 3, 2013

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

John M. Callagy
Nicholas J. Panarella
Martin A. Krolewski

101 Park Avenue
New York, New York 10178
(212) 808-7800

Attorneys for Defendant and Appellee
JPMorgan Chase Bank, N.A.