

**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 (MG)
Debtors.	)	(Jointly Administered)
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MOTORS LIQUIDATION COMPANY	)	
AVOIDANCE ACTION TRUST, by and through	)	Adversary Proceeding
Wilmington Trust Company, solely in its capacity as	)	
Trust Administrator and Trustee,	)	Case No. 09-00504 (MG)
Plaintiff,	)	
vs.	)	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	)	
Defendants.	)	
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**STIPULATION AND [PROPOSED] ORDER DISMISSING CROSS-CLAIMS AGAINST  
JPMORGAN CHASE BANK, N.A. BY MADISON PARK FUNDING I LTD AND  
MADISON PARK FUNDING V LTD**

**IT IS HEREBY STIPULATED AND AGREED**, by and among undersigned  
counsel, as follows:

1. Madison Park Funding I Ltd. and Madison Park Funding V Ltd. dismiss with prejudice the cross-claims they asserted against defendant JPMorgan Chase Bank, N.A. contained in ECF No. 241 dated November 16, 2015.
2. The cross-claims against defendant JPMorgan Chase Bank, N.A. by the other Term Loan Lender Defendants are not affected by this order.

Dated: New York, New York  
May 11, 2017

Dated: Los Angeles, California  
May 11, 2017

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**JONES DAY**

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and Madison Park Funding V. Ltd.*

/s/  
MARTIN GLENN  
United States Bankruptcy Judge

**IT IS SO ORDERED.**

Dated: May \_\_, 2017  
New York, New York