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

|  |   |                               |
|--|---|-------------------------------|
| -----X                                     |   |                               |
|  | : |                               |
| <b>In re</b>                               | : | <b>Chapter 11 Case No.</b>    |
|  | : |                               |
| <b>MOTORS LIQUIDATION COMPANY, et al.,</b> | : | <b>09-50026 (REG)</b>         |
| <b>f/k/a General Motors Corp., et al.</b>  | : |                               |
|  | : |                               |
| <b>Debtors.</b>                            | : | <b>(Jointly Administered)</b> |
|  | : |                               |
| -----X                                     |   |                               |

**MOTORS LIQUIDATION COMPANY ET AL.’S (f/k/a GENERAL MOTORS CORPORATION ET AL.) STATEMENT OF ISSUES PRESENTED ON APPEAL AND COUNTERDESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL IN CONNECTION WITH THE APPEALS OF (i) INDIVIDUAL ACCIDENT LITIGANTS, (ii) RADHA R.M. NARUMANCHI, (iii) IUE-CWA, AND (iv) ALBERT L. BURDICK**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Motors Liquidation Company (f/k/a General Motors Corporation (“GM”)) and its affiliated debtors, as debtors (collectively, the “**Debtors**”), submit the following statement of issues presented on appeal and counterdesignation of additional items to be included in the record in connection with the appeals of (i) Callan Campbell, Kevin Junso, Edwin Agosto, Kevin Chadwick, *et al.*, and Joseph Berlingieri (collectively, the “**Individual Accident Litigants**” or “**IAL**”), (ii) Radha R.M. Narumanchi

(“**Narumanchi**”), (iii) the IUE-CWA, and (iv) Albert I. Burdick (“**Burdick**,” and together with the Individual Accident Litigants, Narumanchi, and the IUE-CWA, “**Appellants**”) from the decision and order of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) (Robert E. Gerber, J.), authorizing and approving the sale of assets pursuant to the Amended and Restated Master Sale and Purchase Agreement with NMGCO, Inc., a U.S. Treasury-Sponsored Purchaser (the “**Purchaser**”), and granting related relief, entered on July 5, 2009 (the “**Order**”) [Docket Nos. 2967, 2968].<sup>1</sup>

### **STATEMENT OF ISSUES ON APPEAL**

1. Is the appeal from the Order moot by reason of (a) Appellants’ failure to obtain a stay of execution of the Order, (b) the consummation of the sale to the Purchaser; and (c) the finding of the Bankruptcy Court that the Purchaser was a good faith purchaser under 11 U.S.C. § 363(m)?

2. Did Appellants meet their burden of establishing that the Bankruptcy Court abused its discretion in authorizing and approving the sale transaction pursuant to 11 U.S.C. § 363 in light of (i) the uncontroverted evidence of the GM Board of Directors’ due care and good faith business judgment in entering into such transaction, adduced at a contested hearing, and (ii) the Bankruptcy Court’s proper application of controlling precedent as most recently reaffirmed in *In re Chrysler LLC*, No. 09-2311-bk, 2009 U.S. App. LEXIS 12351 at \*2 (2d Cir. June 5, 2009) (affirming bankruptcy court’s

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<sup>1</sup> The Debtors reserve the right to amend this Counterdesignation of Additional Items to be Included in the Record on Appeal. For items designated, the designation includes all documents referenced within the particular document number, including, without limitation, all exhibits, attachments, declarations, and affidavits related thereto.

The Order was amended by an errata order entered on July 6, 2009 [Docket No. 2985].

order authorizing sale of substantially all debtor’s assets “for substantially the reasons stated in the opinions of Bankruptcy Judge Gonzalez”), *aff’g In re Chrysler LLC*, 405 B.R. 84 (Bankr. S.D.N.Y. 2009)?

3. In the face of the uncontroverted evidence of the background of and reasons for the sale and the intensive, arm’s-length negotiations that resulted in the sale transaction, did Appellants meet their burden of establishing that the Bankruptcy Court abused its discretion or made clearly erroneous findings of fact in specifically determining that the sale was made in good faith by the Purchaser and the Debtors?

**COUNTERDESIGNATION OF RECORD**

| <b>Designation Number</b>   | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|-----------------------------|-----------------------|----------------------|---|
| 1 <sup>2</sup><br>[IAL D-1] | 6/1/2009              | 1                    | Voluntary Petition (Chapter 11). Order for Relief Entered   |
| 2<br>[IAL D-2;<br>RN D-B]   | 6/1/2009              | 21                   | Affidavit of Frederick A. Henderson Pursuant to Local Bankruptcy Rule 1007-2                                    |
| 3<br>[IAL D-3]              | 6/1/2009              | 37                   | Statement of the United States of America Upon the Commencement of General Motors Corporation’s Chapter 11 Case |
| 4<br>[IAL D-4]              | 6/1/2009              | 68                   | Declaration of William C. Repko in Support of Debtors’ Proposed Debtor in Possession Financing Facility         |
| 5                           | 6/1/2009              | 92                   | Debtor’s Motion Pursuant to 11 U.S.C. §§ 105,   |

<sup>2</sup>Six separate notices of appeal from the Order have been filed (i.e., (i) the Individual Accident Litigants; (ii) Narumanchi; (iii) Jin Ah Lee, Jungil Lee, Sang Chul Lee, and Dukson Lee (collectively, “Lee”); (iv) the IUE-CWA; (v) Albert L. Burdick; and (vi) Oliver Addison Parker). Rather than file a separate counterdesignation of record for each separate appeal, this Counterdesignation of Record designates those items that the Debtors are designating with respect to all six pending appeals from the Order. As such, this Counterdesignation of Record designates certain items that have been designated by one or more Appellants as such items may not have been designated by other appellants in all six appeals. Items that have been designated by one or more of the Appellants will contain the following notation after the entry of the Debtors’ Designation Number: (i) items designated by the Individual Accident Litigants will be denoted “IAL D-\_\_”; items designated by Radha R.M. Narumanchi will be denoted “RN D-\_\_”; and items designated by the IUE-CWA will be denoted “IUE D-\_\_.” Appellants Lee and Oliver Addison Parker have not filed their respective designations of record to date.

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>   |
|---------------------------|-----------------------|----------------------|--|
| [IAL D-5;<br>RN D-F]      |                       |                      | 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing |
| 6                         | 6/1/2009              | 97                   | Notice of Commencement of Chapter 11 Cases and First Day Hearings  |
| 7<br>[IAL D-6;<br>RN D-I] | 6/1/2009              | 105                  | Memorandum of Law in Support of Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC  |
| 8                         | 6/1/2009              | 134                  | Certificate of Service (First Day Motions)   |
| 9<br>[RN D-D]             | 6/1/2009              | 157                  | Case Management Order #1   |
| 10                        | 6/1/2009              | 164                  | Order (I) Authorizing Debtors to (a) Pay Certain Employee Compensation and Benefits and (b) Maintain and Continue Such Benefits and Other Employee-Related Programs and (II) Directing Banks to Honor Prepetition Checks for Payment of Prepetition Employee Obligations   |
| 11                        | 6/1/2009              | 167                  | Order Authorizing Debtors to Honor Prepetition Obligations to Customers, Dealers, and Trade Customers and to Otherwise Continue Warranty, Credit Card, Other Customer, Dealer, and Trade Customer Programs in the Ordinary Course of Business  |
| 12                        | 6/1/2009              | 180                  | Interim Order (i) Authorizing Use of Cash Collateral, (ii) Granting Adequate Protection to the Revolver Secured Parties, (iii) Granting Adequate Protection to the Term Loan Secured Parties, and (iv) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001   |
| 13                        | 6/1/2009              | 181                  | Interim Order Granting Adequate Protection to the Term Loan Secured Parties and Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001  |

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|---------------------------|-----------------------|----------------------|---|
| 14                        | 6/2/2009              | 274                  | Order Approving Procedures for Sale of Debtors' Assets Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Scheduling Bid Deadline and Sale Hearing Date, Establishing Assumption and Assignment Procedures and Fixing Notice Procedures and Approving Form of Notice  |
| 15                        | 6/2/2009              | 292                  | Interim Order Pursuant to Bankruptcy Code Sections 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Code Rules 2002, 4001, and 6004 (A) Approving a DIP Credit Facility and Authorizing the Debtors to Obtain Postpetition Financing Pursuant Thereto, (B) Granting Related Liens and Superpriority Status, (C) Authorizing the Use of Cash Collateral, (D) Granting Adequate Protection to Certain Prepetition Secured Parties, and (E) Scheduling a Final Hearing |
| 16                        | 6/3/2009              | 356                  | Notice Appointing Creditors Committee   |
| 17                        | 6/3/2009              | 374                  | Transcript Regarding Hearing Held on 6/1/09   |
| 18<br>[IAL D-7]           | 6/4/2009              | 422                  | Supplemental Declaration of William C. Repko in Support of Debtors' Proposed Debtor in Possession Financing Facility  |
| 19<br>[IAL D-8]           | 6/4/2009              | 425                  | Declaration of J. Stephen Worth in Support of the Proposed Sale of Debtors' Assets to Vehicle Acquisition Holdings LLC  |
| 20<br>[IAL D-9]           | 6/4/2009              | 431                  | Supplemental Declaration of J. Stephen Worth in Support of the Proposed Sale of Debtors' Assets to Vehicle Acquisition Holdings LLC   |
| 21<br>[IAL D-10]          | 6/4/2009              | 435                  | Declaration of Albert Koch  |
| 22                        | 6/9/2009              | 495                  | Certificate of Service of Laurie M. Thornton of Various Notices and Orders  |
| 23                        | 6/9/2009              | 496                  | Certificate of Service of Laurie M. Thornton  |
| 24                        | 6/12/2009             | 947                  | Notice of Filing of Certain Schedules and Exhibits to the Master Sale and Purchase Agreement  |
| 25                        | 6/12/2009             | 948                  | Notice of Filing of Certain Schedules to the DIP Facility   |
| 26                        | 6/15/2009             | 973                  | Certificate of Service of Jeffrey S. Stein of (a) Notice of Interim Order Establishing Notification Procedures and Approving Restrictions on Certain Transfers of Interests in the Debtors' Estates; (b) Interim Order (I) Establishing Notification Procedures and Approving Restrictions on Certain   |

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|---------------------------|-----------------------|----------------------|---|
|                           |                       |                      | Transfers of Interests in the Debtors' Estates; (c) Notice of Sale Hearing to Sell Substantially All of the Debtors' Assets Pursuant to a Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser; (d) Notice of Chapter 11 Bankruptcy Cases, Meeting of Creditors & Deadlines; (e) Letter to GM Retirees; (f) Order (I) Approving Procedures for Sale of Debtors' Assets Pursuant to Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser; (II) Scheduling Bid Deadline and Sale Hearing Date; (III) Establishing Assumption and Assignment Procedures; and (IV) Fixing Notice Procedures and Approving Form of Notice; and (g) Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto |
| 27                        | 6/19/2009             | 1902                 | Debtors' Objection to Application of General Motors Retirees Association for the Appointment of a Retirees Committee Pursuant to 11 U.S.C. § 1114(d)  |
| 28                        | 6/19/2009             | 1915                 | Debtors' Omnibus Objection to the Motions of the (I) Ad Hoc Committee of Consumer Victims and (II) Ad Hoc Committee of Asbestos Claimants Seeking the Appointment of Additional Committees of Unsecured Creditors and the Appointment of a Future Claims Representative   |
| 29                        | 6/19/2009             | 1916                 | Certificate of Service of Laurie M. Thornton  |
| 30                        | 6/19/2009             | 2032                 | Objection of the Official Committee of Unsecured Creditors to the Motion to Appoint an Official Retiree Committee Pursuant to 11 U.S.C. § 1114(d)   |
| 31                        | 6/23/2009             | 2265                 | Objection of the Official Committee of Unsecured Creditors to the Motion of the Ad Hoc Committee of Consumer Victims of General Motors for Appointment of an Official Committee of Tort Claimants   |
| 32                        | 6/23/2009             | 2344                 | Notice of Filing of Revised Exhibit F to the Master Sale and Purchase Agreement   |
| 33                        | 6/24/2009             | 2379                 | Notice to Take Depositions of Matthew Feldman at the Offices of Schnader Harrison Segal & Lewis on June 26, 2009 at 9:00 a.m.   |

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>   |
|---------------------------|-----------------------|----------------------|--|
| 34                        | 6/24/2009             | 2384                 | Notice to Take Depositions of Frederick A. Henderson at the Offices of Schnader Harrison Segal & Lewis on June 25, 2009 at 9:00 a.m.   |
| 35                        | 6/24/2009             | 2387                 | Notice to Take Depositions of Harry Wilson at the Offices of Schnader Harrison Segal & Lewis on June 27, 2009 at 9:00 a.m.   |
| 36                        | 6/24/2009             | 2390                 | Notice to Take Depositions of Ray Young at the Office of Schnader Harrison Segal & Lewis on June 25, 2009 at 9:00 a.m.   |
| 37                        | 6/24/2009             | 2427                 | Notice of Withdrawal Without Prejudice of Motion of Ad Hoc Committee of Consumer Victims of General Motors for Appointment of Official Committee of Tort Claimants Pursuant to 11 U.S.C. § 1102(a)(2)  |
| 38                        | 6/24/2009             | 2434                 | Confidentiality Order  |
| 39                        | 6/24/2009             | 2451                 | Letter Requesting the Court to Take Judicial Notice of Certain Publicly-Filed Documents  |
| 40                        | 6/24/2009             | 2453                 | Privacy Act Order  |
| 41                        | 6/24/2009             | 2457                 | Debtors' Rebuttal to Reply of General Motors Retirees Association for the Appointment of a Retirees Committee Pursuant to 11 U.S.C. § 1114(d)  |
| 42<br>[IAL D-14]          | 6/25/2009             | 2474                 | Evidence and Witness List for the Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief filed by the Debtors |
| 43<br>[IAL D-15]          | 6/25/2009             | 2479                 | Supplemental Affidavit of Frederick A. Henderson Pursuant to Local Bankruptcy Rule 1007-2  |
| 44                        | 6/25/2009             | 2519                 | Witness and Exhibit List of International Union, United Automobile, Aerospace and Agricultural Implement Workers of America for Hearing on Sale Motion   |
| 45                        | 6/25/2009             | 2529                 | Final Order (A) Approving a DIP Credit Facility and Authorizing the Debtors to Obtain Postpetition Financing Pursuant Thereto, (B) Granting Related Liens and Superpriority Status, (C) Authorizing the  |

| <b>Designation Number</b>   | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|-----------------------------|-----------------------|----------------------|---|
|                             |                       |                      | Use of Cash Collateral, and (D) Granting Adequate Protection to Certain Prepetition Secured Parties   |
| 46                          | 6/25/2009             | 2551                 | Final Order (I) Authorizing Debtors to Use Cash Collateral and (II) Granting Adequate Protection to Prepetition Revolver Secured Parties  |
| 47                          | 6/25/2009             | 2553                 | Final Order Granting Adequate Protection to Term Loan Secured Parties   |
| 48                          | 6/25/2009             | 2556                 | County of Wayne, Michigan's Evidence List for the Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief |
| 49                          | 6/25/2009             | 2565                 | Evidence and Witness List of Ad Hoc Committee of Consumer Victims of General Motors   |
| 50<br>[IAL D-16;<br>RN D-B] | 6/25/2009             | 2577                 | Declaration of Harry Wilson   |
| 51                          | 6/25/2009             | 2578                 | Evidence and Witness List for the Hearing to Consider Debtors' Asset Sale Motion filed by the United States of America  |
| 52<br>[IUE D-1]             | 6/25/2009             | 2582                 | Evidence and Witness List for the Hearing to Consider Debtors' Asset Sale Motion filed by the IUE-CWA   |
| 53                          | 6/25/2009             | 2585                 | Witness and Exhibit List of Product Liability Claimant Advocates for the 363 Sale Hearing   |
| 54                          | 6/26/2009             | 2609                 | Notice to Take Depositions of the United States Treasury and the Purchaser Pursuant to Fed. R. Civ. P. 30(b)(6) and Fed. R. Bankr. P. 7030  |
| 55                          | 6/26/2009             | 2616                 | Evidence and Witness List of Ad Hoc Committee of State Attorneys General  |
| 56                          | 6/26/2009             | 2620                 | Amended Exhibit List of The Texas Department of Transportation, Motor Vehicle Division  |
| 57                          | 6/26/2009             | 2624                 | Amended Evidence and Witness List for the Hearing to Consider Debtors' Asset Sale Motion filed by IUE-CWA   |
| 58                          | 6/26/2009             | 2628                 | Evidence and Witness List of Unofficial Committee of Family and Dissident GM Bondholders for the  |



| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>   |
|---------------------------|-----------------------|----------------------|--|
|                           |                       |                      | Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief                                    |
| 59                        | 6/26/2009             | 2645                 | Omnibus Reply of the Debtors to Objections to Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief          |
| 60<br>[IAL D-17]          | 6/26/2009             | 2646                 | The United States of America's Statement in Support of Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief |
| 61                        | 6/27/2009             | 2649                 | Notice of Filing of the Amended Master Sale and Purchase Agreement and Certain Exhibits and Sections of the Disclosure Schedule Thereto  |
| 62<br>[IUE D-4]           | 6/27/2009             | 2657                 | Amended Evidence and Witness List for the Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain   |

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|---------------------------|-----------------------|----------------------|---|
|                           |                       |                      | Executory Contracts and Unexpired Leases; and (C) Other Relief filed by the Debtors   |
| 63                        | 6/28/2009             | 2659                 | Amended Evidence and Witness List for the Hearing to Consider Debtors' Asset Sale Motion filed by the United States of America  |
| 64                        | 6/29/2009             | 2665                 | Evidence and Witness List of Mark Buttita, as Personal Representative of Salvatore Buttita for the Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to (I) Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing |
| 65<br>[IAL D-18]          | 6/29/2009             | 2681                 | Amended and Supplemented Omnibus Reply of the Debtors to Objections to Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief  |
| 66                        | 6/29/2009             | 2733                 | Evidence and Witness List of Ad Hoc Committee of Asbestos Personal Injury Claimants for Hearing on Debtors' Motion to Approve Sale Pursuant to the Master Sale & Purchase Agreement   |
| 67<br>[IUE D-2]           | 6/29/2009             | 2737                 | Second Amended Evidence and Witness List for the Hearing to Consider Debtors' Asset Sale Motion filed by IUE-CWA  |
| 68                        | 6/29/2009             | 2743                 | Exhibit List of White Marsh/Memphis Secured Lenders for the Hearing to Consider Debtors' Motion to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief   |

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>   |
|---------------------------|-----------------------|----------------------|--|
| 69                        | 6/29/2009             | 2746                 | Amended Exhibit C to Amended and Supplemented Omnibus Reply of the Debtors to Objections to Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief        |
| 70                        | 6/29/2009             | 2752                 | Certificate of Service of Laurie M. Thornton of The Garden City Group, Inc.  |
| 71                        | 6/29/2009             | 2753                 | Notice of Agenda of Matters Scheduled for Hearing on June 30, 2009 at 9:45 a.m.  |
| 72                        | 6/29/2009             | 2756                 | Annexed Charts for Notice of Agenda of Matters Scheduled for Hearing on June 30, 2009 at 9:45 a.m.   |
| 73                        | 6/29/2009             | 2757                 | Certificate of Publication of Notice of Sale Hearing   |
| 74<br>[IUE D-3]           | 6/29/2009             | 2761                 | Corrected Second Amended Evidence and Witness List for the Hearing to Consider Debtors' Asset Sale Motion filed by IUE-CWA   |
| 75                        | 6/29/2009             | 2764                 | Amended and Supplemental Evidence and Witness List of the Ad Hoc Committee of Consumer Victims of General Motors   |
| 76                        | 6/30/2009             | 2765                 | Certificate of Service of Laurie M. Thornton of The Garden City Group, Inc.  |
| 77                        | 6/30/2009             | 2766                 | Debtors' Omnibus Objection to the Exhibits Designated by the Objectors for the Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief |
| 78                        | 6/30/2009             | 2769                 | Amended Statement of Evidence and Witnesses of the Products Liability Claimant Advocates for the 363 Sale Hearing filed by Steve Jakubowski  |
| 79                        | 6/30/2009             | 2770                 | Amended Exhibit J of Amended and Supplemented Omnibus Reply of the Debtors to Objections to  |

| <b>Designation Number</b> | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|---------------------------|-----------------------|----------------------|---|
|                           |                       |                      | Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 to Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief |
| 80                        | 6/30/2009             | 2772                 | Certificate of Service of Laurie M. Thornton of The Garden City Group, Inc.   |
| 81                        | 6/30/2009             | 2773                 | Certificate of Service of Heather L. Stephens of The Garden City Group, Inc.  |
| 82<br>[IAL D-19]          | 6/30/2009             | 2774                 | First Amendment to Amended and Restated Master Sale and Purchase Agreement, dated as of June 30, 2009   |
| 83                        | 6/25/2009             | 2804                 | First Request for Production of Documents to the Debtors for Mark Buttita, an Asbestos Creditor and Member of the Official Committee of Unsecured Creditors of General Motors Corporation   |
| 84                        | 6/25/2009             | 2805                 | Amended First Request for Production of Documents to the Debtors for Mark Buttita, an Asbestos Creditor and Member of the Official Committee of Unsecured Creditors of General Motors Corporation   |
| 85                        | 6/25/2009             | 2806                 | First Request for Production of Documents to Certain Noteholders by Mark Buttita, an Asbestos Creditor and Member of the Official Committee of Unsecured Creditors of General Motors Corporation  |
| 86                        | 6/25/2009             | 2807                 | First Request for Production of Documents to the United States Treasury by Mark Buttita, an Asbestos Creditor and Member of the Official Committee of Unsecured Creditors of General Motors Corporation   |
| 87                        | 6/25/2009             | 2808                 | First Request for Production of Documents to Vehicle Acquisition Holdings LLC by Mark Buttita, an Asbestos Creditor and Member of the Official Committee of Unsecured Creditors of General Motors Corporation   |
| 88                        | 6/25/2009             | 2809                 | Notice of Deposition filed by Mark Buttia   |
| 89                        | 6/25/2009             | 2811                 | Notice of Deposition filed by Mark Buttia   |
| 90                        | 6/25/2009             | 2812                 | Notice of Deposition filed by Mark Buttia   |
| 91                        | 6/25/2009             | 2815                 | Notice of Deposition filed by Mark Buttia   |

| <b>Designation Number</b>    | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>  |
|------------------------------|-----------------------|----------------------|---|
| 92                           | 6/30/2009             | 2843                 | Amended Certificate of Service of Jeffrey S. Stein  |
| 93                           | 6/30/2009             | 2845                 | Certificate of Service of Nancy Formica of The Garden City Group, Inc.  |
| 94                           | 7/1/2009              | 2852                 | Certificate of Service (Second Amended) of Jeffrey S. Stein of The Garden City Group, Inc.  |
| 95                           | 7/1/2009              | 2858                 | Order Denying Motion of the Unofficial Committee of Family and Dissident GM Bondholders for an Order Directing the United States Trustee to Appoint an Official Committee of Family and Dissident Bondholders   |
| 96                           | 7/1/2009              | 2863                 | Deposition Designations of the Official Committee of Unsecured Creditors  |
| 97<br>[IAL D-21]             | 7/1/2009              | 2867                 | Statement of the Debtors on Successor Liability   |
| 98                           | 7/1/2009              | 2872                 | Table of Contents and Table of Authorities for Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing |
| 99                           | 7/1/2009              | 2910                 | Certificate of Publication of Angela Ferrante of The Garden City Group, Inc. of Notice of Commencement of Chapter 11 Cases and First Day Hearing  |
| 100                          | 7/2/2009              | 2911                 | The United States of America's Counter-Designation of Deposition Testimony  |
| 101                          | 7/2/2009              | 2918                 | Deposition Designations of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO   |
| 102<br>[RN D-J;<br>IUE D-5]] | 7/2/2009              | 2922                 | PDF with attached Audio File of 6/30/2009 Hearing   |
| 103<br>[RN D-J;<br>IUE D-5]  | 7/2/2009              | 2926                 | PDF with attached Audio File of 6/30/2009 Hearing   |

| <b>Designation Number</b>                 | <b>Date of Filing</b> | <b>Docket Number</b> | <b>Description</b>   |
|---|-----------------------|----------------------|--|
| 104<br>[RN D-J;<br>IUE D-5]               | 7/2/2009              | 2927                 | PDF with attached Audio File of 6/30/2009 Hearing  |
| 105<br>[RN D-J;<br>IUE D-5]               | 7/2/2009              | 2928                 | PDF with attached Audio File of 6/30/2009 Hearing  |
| 106<br>[IUE D-6]                          | 7/2/2009              | 2929                 | PDF with attached Audio File of 7/1/2009 Hearing   |
| 107<br>[RN D-J;<br>IUE D-6]               | 7/2/2009              | 2930                 | PDF with attached Audio File of 7/1/2009 Hearing   |
| 108<br>[RN D-J;<br>IUE D-6]               | 7/2/2009              | 2931                 | PDF with attached Audio File of 7/1/2009 Hearing   |
| 109<br>[RN D-J;<br>IUE D-6]               | 7/2/2009              | 2932                 | PDF with attached Audio File of 7/1/2009 Hearing   |
| 110                                       | 7/2/2009              | 2934                 | Debtors' Counter-Deposition Designations   |
| 111                                       | 7/2/2009              | 2953                 | Certificate of Service of Laurie M. Thornton of The Garden City Group, Inc.  |
| 112                                       | 7/2/2009              | 2955                 | Certificate of Service of Laurie M. Thornton of The Garden City Group, Inc.  |
| 113                                       | 7/3/2009              | 2962                 | Letter dated July 2, 2009 from Stephen Karotkin to The Honorable Robert E. Gerber in Response to Request for the References of the Prepetition Loan and Security Agreement, dated as of December 31, 2008, by and between General Motors Corporation and the U.S. Treasury |
| 114<br>[IAL D-23;<br>RN D-E;<br>IUE D-8]  | 7/5/2009              | 2967                 | Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of Related Executory Contracts; and (3) Entry into UAW Retiree Settlement Agreement  |
| 115<br>[IAL D-24;<br>RN D-E;<br>IUE D-10] | 7/5/2009              | 2968                 | Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and                              |

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|                             |                       |                      | Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief   |
| 116                         | 7/5/2009              | 2969                 | Order Pursuant to Bankruptcy Code Sections 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rules 2002, 4001, and 6004 (A) Approving Amendment to DIP Credit Facility to Provide for Debtors Postpetition Wind-Down Financing   |
| 117<br>[RN D-J;<br>IUE D-7] | 7/6/2009              | 2972                 | PDF with attached Audio File of 7/2/2009 Hearing  |
| 118<br>[IUE D-7]            | 7/6/2009              | 2973                 | PDF with attached Audio File of 7/2/2009 Hearing  |
| 119<br>[IUE D-7]            | 7/6/2009              | 2974                 | PDF with attached Audio File of 7/2/2009 Hearing  |
| 120<br>[RN D-E]             | 7/6/2009              | 2985                 | Errata Order re: Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of Related Executory Contracts; and (3) Entry into UAW Retiree Settlement Agreement  |
| 121                         | 7/6/2009              | 2993                 | Amended Certificate of Service of Laurie M. Thornton  |
| 122                         | 7/7/2009              | 2996                 | Court Order re Motion to Allow Direct Appeal to Second Circuit  |
| 123                         | 7/7/2009              | 2998                 | Order Denying Application of General Motors Retirees Association for Appointment of a Retiree Committee   |
| 124                         | 6/30/2009             | 3020                 | Request for Discovery and Demand for Production of Documents filed by Oliver Addison Parker   |
| 125<br>[IAL D-29]           | 7/7/2009              | 3026                 | The United States of America's Objection to Certain Appellants' Motions for an Order Certifying the Sale Order for Immediate Appeal to the United States Court of Appeals, Pursuant to 28 U.S.C. § 158(d)(2), or in the Alternative for a Stay of the Sale Order, Pursuant to Fed. R. Bankr. P. 8005      |
| 126<br>[IAL D-30]           | 7/7/2009              | 3028                 | Objection of the Official Committee of Unsecured Creditors to (I) the Ad Hoc Committee of Asbestos Personal Injury Claimants' Motion for an Order Certifying Sale Order for Immediate Appeal to the United States Court of Appeals, Pursuant to 28 U.S.C. § 158(d)(2) or in the Alternative for a Stay of |

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|                           |                       |                      | the Sale Order, Pursuant to Fed. R. Bankr. P. 8005, and (II) Motion of the Individual Accident Litigants for an Order Certifying the Sale Order for Immediate Appeal to the United States Court of Appeals, Pursuant to 28 U.S.C. § 158(d)(2) on the Issue of Successor Liability  |
| 127<br>[IAL D-31]         | 7/7/2009              | 3029                 | Omnibus Objection of the Debtors to (i) Motion of the Individual Accident Litigants for an Order Certifying the Sale Order for Immediate Appeal to the United States Court of Appeals Pursuant to 28 U.S.C. § 158(d)(2) on the Issue of Successor Liability, and (ii) the Ad Hoc Committee of Asbestos Personal Injury Claimants' Motion for an Order Certifying Sale Order for Immediate Appeal to the United States Court of Appeals, Pursuant to 28 U.S.C. § 158(d)(2) or in the Alternative for a Stay of the Sale Order, Pursuant to Fed. R. Bankr. P. 8005         |
| 128                       | 7/7/2009              | 3031                 | Declaration of J. Stephen Worth  |
| 129<br>[IAL D-32]         | 7/7/2009              | 3035                 | Amended Omnibus Objection of the Debtors to (i) Motion of the Individual Accident Litigants for an Order Certifying the Sale Order for Immediate Appeal to the United States Court of Appeals Pursuant to 28 U.S.C. § 158(d)(2) on the Issue of Successor Liability, and (ii) the Ad Hoc Committee of Asbestos Personal Injury Claimants' Motion for an Order Certifying Sale Order for Immediate Appeal to the United States Court of Appeals, Pursuant to 28 U.S.C. § 158(d)(2) or in the Alternative for a Stay of the Sale Order, Pursuant to Fed. R. Bankr. P. 8005 |
| 130<br>[IAL D-33]         | 7/7/2009              | 3046                 | Bench Decision and Order on Motions for § 158(d)(2) Certification, or in the Alternative, for Stay Pending Appeal  |
| 131                       | 7/8/2009              | 3056                 | Errata Order re: Bench Decision and Order on Motions for § 158(d)(2) Certification, or in the Alternative, for Stay Pending Appeal   |
| 132                       | 7/8/2009              | 3058                 | Certificate of Service of Laurie M. Thornton of (1) Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief and (2) Order Pursuant   |



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|------------------------------|-----------------------|----------------------|---|
|                              |                       |                      | to Bankruptcy Code Sections 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rules 2002, 4001, and 6004 (A) Approving Amendment to DIP Credit Facility to Provide for Debtors Postpetition Wind-Down Financing  |
| 133<br>[IAL D-34]            | 7/8/2009              | 3062                 | Transcript regarding Hearing Held on 7/2/09 re: Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing |
| 134<br>[IAL D-35]            | 7/8/2009              | 3087                 | Transcript regarding Hearing Held on 6/30/09  |
| 135                          | 7/10/2009             | 3090                 | Notice of Change of Case Caption  |
| 136                          | 7/10/2009             | 3092                 | Amended List of Debtors   |
| 137                          | 7/10/2009             | 3106                 | Amended Notice of Change of Case Caption  |
| 138                          | 7/11/2009             | 3120                 | Certificate of Service of Laurie M. Thornton  |
| 139<br>[IAL D-36]            | 7/10/2009             | 3182                 | Transcript regarding Hearing Held on 7/7/2009 re: Motion to Allow Direct Appeal to Second Circuit   |
| 140                          | 7/16/2009             | 3193                 | Memorandum and Order of U.S. District Court Judge Lewis A. Kaplan in an M-47 Proceeding   |
| 141                          | 7/15/2009             | 3205                 | Transcript regarding Hearing Held on 7/1/09   |
| 142<br>[IAL D-38;<br>RN D-A] | 7/22/2009             | 3287                 | Deposition Filed Under Seal   |
| 143<br>[IAL D-39;<br>RN D-A] | 7/22/2009             | 3288                 | Deposition Filed Under Seal   |
| 144                          | 7/27/2009             | 3399                 | Agreed Protective Order Establishing Procedures for the Protection of Confidential Information  |
| 145                          | 7/27/2009             | 3404                 | Documents Introduced into Evidence at Sale Hearing Filed Under Seal   |
| 146                          | 7/27/2009             | 3407                 | Documents Introduced into Evidence at Sale Hearing Filed Under Seal   |
| 147                          | 7/27/2009             | 3408                 | Documents Introduced into Evidence at Sale Hearing  |

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|---------------------------|-----------------------|----------------------|--|
|                           |                       |                      | Filed Under Seal   |
| 148                       | 7/27/2009             | 3409                 | Documents Introduced into Evidence at Sale Hearing<br>Filed Under Seal   |
| 149                       | 7/27/2009             | 3410                 | Documents Introduced into Evidence at Sale Hearing<br>Filed Under Seal   |
| 150                       | 7/27/2009             | 3411                 | Documents Introduced into Evidence at Sale Hearing<br>Filed Under Seal   |
| 151                       | 7/27/2009             | 3412                 | Documents Introduced into Evidence at Sale Hearing<br>Filed Under Seal   |
| 152                       | 7/27/2009             | 3413                 | Documents Introduced into Evidence at Sale Hearing<br>Filed Under Seal   |
| 153                       | 7/27/2009             | 3414                 | Documents Introduced into Evidence at Sale Hearing<br>Filed Under Seal   |
| 154                       | 7/27/2009             | 3419                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 155                       | 7/27/2009             | 3420                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 156                       | 7/27/2009             | 3421                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 157                       | 7/27/2009             | 3422                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 158                       | 7/27/2009             | 3423                 | Notice of First Amendment to Amended and Restated DIP Facility   |
| 159                       | 7/27/2009             | 3424                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated                                    |

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|---------------------------|-----------------------|----------------------|--|
|                           |                       |                      | Master Sale and Purchase Agreement   |
| 160                       | 7/27/2009             | 3425                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 161                       | 7/27/2009             | 3426                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 162                       | 7/27/2009             | 3427                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 163                       | 7/27/2009             | 3428                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 164                       | 7/27/2009             | 3429                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 165                       | 7/27/2009             | 3430                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 166                       | 7/27/2009             | 3431                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 167                       | 7/27/2009             | 3432                 | Notice of Filing of Exhibits Offered Into Evidence at  |

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|                           |                       |                      | Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement   |
| 168                       | 7/27/2009             | 3433                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 169                       | 7/27/2009             | 3434                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 170                       | 7/27/2009             | 3435                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 171                       | 7/27/2009             | 3436                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 172                       | 7/27/2009             | 3437                 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |

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| 173 | 7/27/2009          | 3438 | Notice of Filing of Exhibits Offered Into Evidence at Hearing to Consider Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to Approve the Sale Pursuant to the Amended and Restated Master Sale and Purchase Agreement |
| 174 | 6/1/2009-7/27/2009 | N/A  | Docket for <i>Motors Liquidation Company, et al. (f/k/a General Motors Corp. et al.)</i> , Ch. 11 Case No. 09-50026 (REG)  |

Dated: New York, New York  
July 27, 2009

/s/ Harvey R. Miller

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