

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

---

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

---

**RESPONSE TO OBJECTION TO CLAIM**

TAKE NOTICE that the Debtor Foster Townsend Graham & Associates LLP, Claim number 38931 as listed in Exhibit "A" of the Notice of 220<sup>TH</sup> Omnibus Objection to Claims objects to the expungement of its claim on the basis that the Statement of Claim was issued on August 9, 2007, the Statement of Defence served and dated June 25, 2008 and the case has not yet been settled or tried. To date, no judgment has been rendered.

The amount of the claim as of the date the case was filed on June 1, 2009, is \$5 million dollars. The basis for the claim is a Crossclaim in relation to the legal action for personal injury and enclosed herewith is a copy of the Statement of Defence and Crossclaim (attached as Exhibit "A").

The Plaintiff in a civil matter (court file number 4768-07 issued on August 9, 2007 in the City of Milton, Ontario, Canada) had also filed a Proof of Claim form on November 10, 2009 and provided a copy of the Statement of Claim.

Dated: London, Ontario, Canada  
April 29, 2011

FOSTER, TOWNSEND, GRAHAM  
AND ASSOCIATES  
Barristers & Solicitors  
551 Waterloo Street  
London, Ontario  
N6B 2R1  
John F. Graham/Jacqueline A. Bunt  
LSUC #24499U/40063D  
Solicitors for the Defendant,  
Arthur Parratt

TO: **Harvey R. Miller, Esq.**  
**Stephen Karotkin, Esq**  
**& Joseph H. Smolinsky, Esq**  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153

AND TO: **Thomas Morrow**  
Motors Liquidation Company  
401 South Old Woodward Avenue  
Suite 370  
Birmingham, Michigan 48009

AND TO: **Lawrence S. Buonomo, Esq.**  
General Motors LLC  
400 Renaissance Center  
Detroit, Michigan 48265

AND TO: **John J. Rapisardi, Esq.**  
Cadwalader, Wickersham & Talf LLP  
One World Financial Center  
New York, New York 10281

AND TO: **John Samarias, Esq.**  
The United States Department of the Treasury  
1500 Pennsylvania Avenue NW  
Room 2312  
Washington, D.C. 20220

AND TO: **Michael J. Edelman &**  
**Michael L. Schein, Esq.**  
Vedder Price  
1633 Broadway  
47<sup>th</sup> Floor  
New York, New York 10019

AND TO: **Thomas Moers Mayer, Esq.**  
**Robert Schmidt, Esq.**  
**Lauren Macksoud, Esq.**  
**Jennifer Sharret, Esq.**  
Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, New York 10036

AND TO: **Tracy Hope Davis, Esq.**  
The Office of the United States Trustee  
for the Southern District of New York  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, New York 10004

AND TO: **David S. Jones, Esq. &**  
**Natalie Kuehler, Esq.**  
The U.S. Attorney's Office, S.D.N.Y.  
86 Chambers Street, Third Floor  
New York, New York 10007

AND TO: **Elihu Inselbuch, Esq. &**  
**Rita C. Tobin, Esq.**  
Caplin & Drysdale  
375 Park Avenue, 35<sup>th</sup> Floor  
New York, New York 10152-3500

AND TO: **Trevor W. Swett III, Esq.**  
**& Kevin C. Maclay, Esq.**  
Caplin & Drysdale  
One Thomas Circle, N.W.  
Suite 1100  
Washington, D.C. 20005

AND TO: **Sander L. Esserman, Esq.**  
**& Robert T. Brousseau, Esq.**  
Stutzman, Bromberg, Esserman & Plifka  
2323 Bryan Street, Suite 2200  
Dallas, Texas 75201

AND TO: **Keith Martorana, Esq.**  
Gibson, Dunn & Crutcher LLP  
200 Park Ave., 47<sup>th</sup> Floor  
New York, New York 10166

AND TO: **Anna Phillips**  
FTI Consulting  
One Atlantic Center  
1201 West Peachtree Street, Suite 500  
Atlanta, Georgia 30309