

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

IN RE:

MOTORS LIQUIDATION CO., et al.,

Debtors.

CASE NO. 09-50026 (REG)

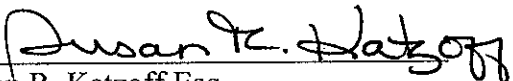
**CHAPTER 11
(Jointly Administered)**

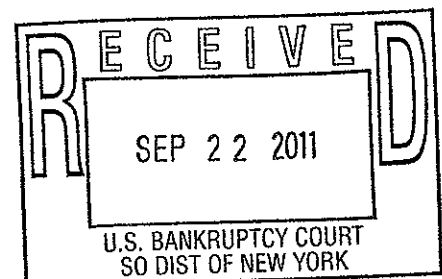
**THE SCHAEFER GROUP INC.'S
NOTICE OF WITHDRAWAL OF PROOF OF CLAIM**

Please take notice that creditor The Schaefer Group Inc. hereby withdraws with prejudice that certain proof of claim filed against Debtor General Motors Corporation, n/k/a Motors Liquidation Company, docketed as claim number 22 on the Court's Claim Register and as claim number 0286 on the Motors Liquidation Company's Claim Register (each as evidenced by the attachments hereto).

Respectfully submitted,
HISCOCK & BARCLAY, LLP

Dated: September 19, 2011

By: 
Susan R. Katzoff Esq.
Attorneys for The Schaefer Group Inc.
One Park Place
300 South State Street
Syracuse, New York 13202



UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK		PROOF OF CLAIM
Name of Debtor General Motors Corporation		Case Number 09-50026
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property) The Schaefer Group Inc.		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number _____ (if known) Filed on: _____
Name and address where notices should be sent Hiscock & Barclay, LLP One Park Place, 300 South State Street, Syracuse, NY 13202 Attn: Susan R. Katzoff, Esq.		
Telephone number 315-425-2880		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
Name and address where payment should be sent (if different from above) Hiscock & Barclay, LLP One Park Place, 300 South State Street, Syracuse, NY 13202 Attn: Matthew J. Larkin, Esq.		
1. Amount of Claim as of Date Case Filed \$ <u>TBD*</u> If all or part of your claim is secured, complete item 4 below, however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.		5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim: <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507 (a)(4). <input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507 (a)(5). <input type="checkbox"/> Up to \$2,425* of deposits toward purchase lease or rental of property or services for personal, family, or household use - 11 U.S.C. § 507 (a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507 (a)(8). <input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507 (a) (____). Amount entitled to priority \$ _____
2. Basis for Claim <u>personal injury lawsuit (indemnification)</u> (See instruction #2 on reverse side)		
3. Last four digits of any number by which creditor identifies debtor <u>CA2008-0128254</u> 3a. Debtor may have re-scheduled account as _____ (See instruction #3a on reverse side)		
4. Secured Claim (See instruction #4 on reverse side) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Describe: _____ Value of Property \$ _____ Annual Interest Rate _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any \$ _____ Basis for perfection _____ Amount of Secured Claim \$ _____ Amount Unsecured \$ _____		
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 7. Documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of 'redacted' on reverse side). DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain: _____		
Date 6/18/09		FOR COURT USE ONLY
Signature: The person filing this claim must sign it. Sign and print name and title, if any of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. By <u>/s/ Susan R. Katzoff</u> <u>Susan R. Katzoff, Esq.</u>		



Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years; or both 18 U.S.C. §§ 152 and 3571.

*The amount of this claim is contingent based upon pending litigation as outlined in the attached complaint (Plaintiff, Jan E. Hondusky has claimed damages of \$15,000,000 in his verified bill of particulars in the underlying complaint which forms the basis of this creditor's claim).

SYLIB0170092711

Southern District of New York Claims Register

09-50026-reg Motors Liquidation Company

Judge: Robert E. Gerber **Chapter:** 11
Office: Manhattan **Last Date to file claims:**
Trustee: **Last Date to file (Govt):**

Creditor: (924) The Schaefer Group, Inc. c/o Hiscock & Barclay, LLP One Park Place 300 South State Street Syracuse, NY 13202	Claim No: 22 <i>Original Filed</i> Date: 06/18/2009 <i>Original Entered</i> Date: 06/18/2009	Status: Filed by: CR Entered by: Katzoff, Susan Modified:
Unknown claimed: \$15000000.00 Total claimed: \$15000000.00		
History: <u>Details</u> <u>22-1</u> 06/18/2009 Claim #22 filed by The Schaefer Group, Inc., total amount claimed: \$15000000 (Katzoff, Susan)		
Description: (22-1) damages claimed in pending personal injury/indemnification litigation		
Remarks:		

Claims Register Summary

Case Name: Motors Liquidation Company
Case Number: 09-50026-reg
Chapter: 11
Date Filed: 06/01/2009
Total Number Of Claims: 1

	Total Amount Claimed	Total Amount Allowed
Unsecured		
Secured		
Priority		
Unknown	\$15000000.00	
Administrative		
Total	\$15000000.00	\$0.00

PACER Service Center			
Transaction Receipt			
08/12/2011 13:43:01			
PACER	hb0039	Client	1639-9999999/schaefer