UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

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Debtors. : (Jointly Administered)

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NOTICE OF MATTERS SCHEDULED FOR HEARING ON OCTOBER 21, 2011 AT 9:45 A.M.

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling Green, New York, NY 10004-1408

I. CONTESTED MATTERS

1. Final Application of Kramer Levin Naftalis & Frankel LLP, as Counsel for the Official Committee of Unsecured Creditors, (I) for Final Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred during the Period from October 1, 2010 through March 29, 2011 and (II) for Final Approval of Compensation for Professional Services Rendered and for Reimbursement o Actual and Necessary Expenses Incurred curing the Period June 1, 2009 through and Including March 29, 2011 (ECF No. 10268)

Responses Filed:

A. Limited Objection of United States of America to Final Fee
Application of Kramer Levin Naftalis & Frankel LLP as
Counsel to the Official Committee of Unsecured Creditors (ECF No. 11033)

Replied Filed:

B. Reply of Kramer Levin Naftalis & Frankel LLP to the Limited Objection of the United States of America to the Final Fee Application of Kramer Levin Naftalis & Frankel LLP as

Counsel to the Official Committee of Unsecured Creditors (**ECF No. 11047**)

Additional Documents:

C. Fee Examiner's Stipulated Statement on Fifth Interim and Final Fee Application of Kramer Levin Naftalis & Frankel LLP (ECF No. 10884)

Status: This matter is going forward.

2. Official Committee of Unsecured Creditors of Motors Liquidation Company, et al. v. United States Department of the Treasury, Export Development Canada, Adv. Proc. No. 11-09406 (REG) - Memorandum of Law in Support of Defendant United States Department of the Treasury's Motion to Dismiss the Complaint (ECF No. 12)

Responses Filed:

A. Plaintiffs Memorandum of Law In Opposition to Defendants Motion to Dismiss the First Amended Complaint (ECF No. 19)

Replies Filed:

B. Reply Memorandum of Law in Support of Defendant United States Department of the Treasury's Motion to Dismiss the Complaint (ECF No. 20)

Additional Documents:

- C. Joinder Of Defendant Export Development Canada To Defendant United States Department Of Treasury's Motion To Dismiss Complaint (ECF No. 13)
- D. Defendant Export Development Canada's Reply Memorandum of Law in Support of Defendant United States Department of the Treasury's Motion to Dismiss Complaint (**ECF No. 21**)

Status: This matter is going forward.

3. Official Committee of Unsecured Creditors of Motors Liquidation Company, et al. v. United States Department of the Treasury, Export Development Canada, Adv. Proc. No. 11-09406 (REG) - Plaintiffs' Memorandum of Law in Support of Motion for Summary Judgment (ECF No. 11)

Responses Filed:

- A. Government's Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment and in Support of Government's Cross-Motion for Summary Judgment (ECF No. 15)
- B. Defendant Export Development Canada Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment and Joinder in Support of Defendant United States Department of the Treasury's Cross-Motion for Summary Judgment (ECF No. 18)

Replies Filed:

- C. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Summary Judgment and Response to Defendants' Cross-Motion for Summary Judgment (ECF No. 22)
- D. Government's Reply Memorandum of Law In Further Support of Government's Cross-Motion for Summary Judgment (ECF No. 23)
- E. Defendant Export Development Canada's Reply Memorandum of Law in Support of DIP Lenders' Cross-Motion for Summary Judgment (ECF No. 25)

<u>Additional Documents</u>: None filed to date.

Status: This matter is going forward.

Dated: New York, New York October 19, 2011

/s/ Joseph H. Smolinsky

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky

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Attorneys for Debtors

and Post-Effective Date Debtors