

Barry N. Seidel (BS-1945)  
 Stefanie Birbrower Greer (SG-2898)  
 DICKSTEIN SHAPIRO LLP  
 1633 Broadway  
 New York, New York 10019-6708  
 Telephone: (212) 277-6500  
 Facsimile: (212) 277-6501

Attorneys for Motors Liquidation  
 Company GUC Trust

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

-----X	
<b>In re</b>	: Chapter 11 Case No.
	: :
<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	

**NOTICE OF PRESENTMENT OF ORDER RECLASSIFYING AND  
 ALLOWING CLAIM NUMBER 70860 AND EXPUNGING  
 CLAIM NUMBERS 70481, 70490, AND 70869 FILED BY TRACY WOODY**

**PLEASE TAKE NOTICE** that, the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan dated March 18, 2011, will present the attached Order (the “**Proposed Order**”) to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for approval and signature at Room 621 of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), One Bowling Green, New York, New York 10004 on **January 30, 2012, at 4:00 p.m. (Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Proposed Order must be made in writing and received (i) in the Bankruptcy Judge’s chambers at the United

States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 and (ii) by Dickstein Shapiro LLP, attorneys for the GUC Trust, 1633 Broadway, New York, New York, 10019 (Attn: Stefanie Birbrower Greer, Esq., and Barry N. Seidel, Esq.), not later than **January 30, 2012 at 12:00 p.m. (Eastern)**. Unless Objections are received by that time, the GUC Trust may submit the Proposed Order to the Bankruptcy Court, which may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
January 19, 2012

/s/ Stefanie Birbrower Greer  
Barry N. Seidel (BS-1945)  
Stefanie Birbrower Greer (SG-2898)  
DICKSTEIN SHAPIRO LLP  
1633 Broadway  
New York, New York 10019-6708  
Telephone: (212) 277-6500  
Facsimile: (212) 277-6501

Attorneys for Motors Liquidation  
Company GUC Trust

**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	

**ORDER RECLASSIFYING AND ALLOWING CLAIM NUMBER 70860 AND  
EXPUNGING CLAIM NUMBERS 70481, 70490, AND 70869 FILED BY TRACY WOODY**

Upon the 243rd omnibus objection to expunge certain claims and motion requesting enforcement of the Bar Date Orders (ECF No. 10746, the “**Objection**”) and the Objection to Claim Nos. 70860 and 70869 filed by the GUC Trust (ECF No. 11150, the “**Supplemental Objection**”),<sup>1</sup> filed by the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time, the “**Plan**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) (ECF No. 4180), and this Court’s order approving the procedures relating to the filing of proofs of claim (the “**Bar Date Order**”) (ECF No. 4079), seeking entry of an order with respect to Claim Numbers 70481, 70490, 70860, and 70869 filed by Tracy

<sup>1</sup> Capitalized terms used but not defined herein shall have the respective meanings ascribed to them in the Omnibus Objection or Supplemental Objection, as applicable.

Woody (the “**Claimant**”), all as more fully described in the Objection and Supplemental Objection; and the Court having considered the Response to the 243rd Objection filed by Tracy Woody and request for sanctions (ECF No. 10913) and the Reply to the Response of Tracy Woody filed by the GUC Trust (ECF No. 11301); and upon the record of the hearing on January 18, 2012 (the “**Hearing**”); and the Court having found and determined that the relief sought is in the best interests of the Debtors, their estates, creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that Claim Nos. 70481, 70490, and 70869 are hereby disallowed and expunged; and it is further

ORDERED that Claim No. 70860 is hereby reclassified as a general unsecured claim; and it is further

ORDERED that Claim No. 70680 is hereby allowed in the amount of \$39,376.02; and it is further

ORDERED that Claimant’s request for sanctions against the attorneys for the GUC Trust is hereby denied;

ORDERED that the time to appeal shall run from the date this order is entered; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2012

\_\_\_\_\_  
United States Bankruptcy Judge