HEARING DATE AND TIME: April 26, 2012 at 9:45 a.m. (Eastern Time) RESPONSE DEADLINE: April 19, 2012 at 4 p.m. (Eastern Time)

Betty E. Dalton 1707 Radford Road Christiansburg, VA 24073 Telephone: 540-381-3838

United States Bankruptcy Court

Southern District of New York

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Motors Liquidation Company, et al.,	
f/k/a General Motors Corp., et al.)
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Debtors	Case No. 09-50026 (REG)
) Chapter 11
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RESPONSE TO DEBTORS ADJOURNED OMNIBUS OBJECTON No. 165, SUPPLEMENTAL BRIEF TO CLAIM #70180

TO THE HONORABLE ROBERT E. GERBER, UNITED STATED BANKRUPTCY JUDGE

Betty E. Dalton submits this response concerning the Debtors objection to late-filed claim, #70180, based solely on adequate communication of lawsuit.

ARGUMENT

- 1) The Debtors did not adequately communicate lawsuit and the deadline for filing in the area in which Claimant resides.
- 2) The Claimant requests some allowance by the Court for exceeding the filing deadline based on the discovery of the lawsuit and the circumstances involved.
- 3) Newspapers are no longer the main communication media used by the majority to access information.

Copies sent to:

- (i) Dickstein Shapiro, LLP, attorneys for the GUC Trust, 1633 Broadway, New York, New York, 10019-6708 (Attn: Barry N. Seidel, Esq., and Stefanie Birbrower Greer, Esq.)
- (ii) Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow)
- (iii) General Motors LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.)

- (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.)
- (v) the United States Department of Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.)
- (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.)
- (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq. and Jennifer Sharret, Esq.)
- (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York, 10004 (Attn: Tracy Hope Davis, Esq.)
- (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.)
- (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York, 10152-3500 Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W. Suite 1100, Washington DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.)
- (xi) Stutzman Bromberg, Esserman, & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, TX 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Broussseau, Esq.)
- (xii) Gibson, Dunn, & Crutcher LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator and for Wilmington Trust company Trust Company as Avoidance Action Trust Administrator, 200 Park Avenue, 47th Floor, New York, New York 10166 (Attn: Keith Martorana, Esq.)
- (xiii) FTI Consulting, as the GUC Trust Monitor and the Avoidance Action Trust Monitor, One Atlantic Center, 1201 West Peachtree Street, Suite 500, Atlanta, Georgia 30309 (Attn: Anna Phillips).
- (xiv) Crowell & Moring, LLP, attorneys for the Revitalizing Auto Communities Environmental Response Trust, 590 Madison Avenue, 19th Floor, New York, New York 10022-2524 (Attn: Michael V. Blumenthal, Esq.)
- (xv) Kirk P. Watson, Esq., as the Asbestos Trust Administrator, 2301 Woodlawn Boulevard, Austin, TX 78703

Date: April 16, 2012

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