

Presentment Date and Time: June 11, 2012 at 12:00 p.m. (Eastern Time)
Response Deadline: June 11, 2012 at 11:30 a.m. (Eastern Time)

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**

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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.	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF PROPOSED
ORDER GRANTING THE OBJECTION TO PROOFS OF
CLAIM NOS. 70896 AND 70925 FILED BY MAYA BROADY**

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 granting the GUC Trust’s Objection to Proofs of Claim Nos. 70896 and 70925 filed by Maya Broady (the “**Proposed Order**”) to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on **June 11, 2012 at 12:00 noon (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 **June 11, 2012 at 11:30 a.m. (Eastern Time)**. Notwithstanding the receipt of any such objections, the Bankruptcy Court may enter the Proposed Order.

Dated: New York, New York
June 1, 2012

/s/ Stefanie Birbrower Greer
Barry N. Seidel (BS-1945)
Stefanie Birbrower Greer (SG-2898)
DICKSTEIN SHAPIRO LLP
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Debtors.	:
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Chapter 11 Case No.
09-50026 (REG)
(Jointly Administered)

**ORDER GRANTING THE OBJECTION TO PROOFS
OF CLAIM NOS. 70896 AND 70925 FILED BY MAYA BROADY**

Upon the 276th Omnibus Objection to Proofs of Claim Numbers 70896 and 70925 (the “**Claims**”) filed by Maya Broady dated April 27, 2012 (the “**Objection**”) (ECF. No. 11646), of 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**”), seeking entry of an order reclassifying the Claims on the grounds that the Claims were incorrectly classified by Ms. Broady and disallowing and expunging the Claims on the basis that they were not timely filed, as more fully described in the Objection; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court having considered the response to the Objection filed by Maya Broady (ECF. No. 11726) and the GUC Trust’s reply thereto (ECF. No. 11752); and the Court at the hearing on the Objection on May 31, 2012 (the “**Hearing**”) having found and determined that the relief sought in the Objection is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set

forth in the Objection establish just cause for the relief granted herein; and upon the record, including findings of fact and conclusions of law set forth by this Court at the Hearing; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further

ORDERED that the Claims are hereby reclassified as general unsecured claims; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Claims are disallowed and expunged; and it is further

ORDERED that the time to appeal runs 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