

HEARING DATE AND TIME: September 24, 2012 at 9:45 a.m. (Eastern Time)

RESPONSE DEADLINE: September 12, 2012 at 4:00 p.m. (Eastern Time)

Barry N. Seidel (BS-1945)
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*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)
	:
-----X	

**NOTICE OF OBJECTION TO PROOF OF
CLAIM NO. 29628 FILED BY TIESHA MCNEAL**

PLEASE TAKE NOTICE that on August 7, 2012, 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, filed its objection to proof of claim number 29628 filed by Tiesha McNeal (the “**Objection**”), and that a hearing (the “**Hearing**”) to consider the Objection will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **September 24, 2012, at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Objection must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (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) the Debtors, c/o 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 the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the 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, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.); (xii) Gibson, Dunn & Crutcher LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator and for Wilmington 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 as 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.); and (xv) Kirk P. Watson, Esq., as the Asbestos Trust Administrator, 2301 Woodlawn Boulevard, Austin, Texas 78703, so as to be received no later than **September 12, 2012, at 4:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Objection, the GUC Trust may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the

Objection, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
August 7, 2012

/s/ Stefanie Birbrower Greer
Barry N. Seidel (BS-1945)
Stefanie Birbrower Greer (SG-2898)

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New York, New York 10019-6708
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*Attorneys for Motors Liquidation
Company GUC Trust*

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

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In re	: Chapter 11 Case No.
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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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**OBJECTION TO PROOF OF CLAIM
NO. 29628 FILED BY TIESHA McNEAL**

TO THE HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE:

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**”), objects to proof of claim number 29628 filed by Tiesha McNeal (the “**Claim**”), a former employee of David Zerkel Sales Ltd d/b/a DMR Clothing Store (“**Zerkel**”), located inside the Debtors’ assembly plant in Shreveport, Louisiana, because the Claim fails to set forth a legal basis sufficient to support any right of payment from the Debtors. In support of this Objection, the GUC Trust respectfully represents:

PRELIMINARY STATEMENT

1. Tiesha McNeal (“**McNeal**”), a *pro se* litigant, seeks \$1 million from the Debtors for damages allegedly suffered in connection with her employment with and, ultimately, termination by Zerkel. McNeal asserts that she was discriminated against on the basis of “race, Black, sex, female and in retaliation for complaining about discriminatory practices” in violation of Title VII of the Civil Rights Act of 1964 (“**Title VII**”). *See* Exhibit A.¹

2. In order to sustain a claim under Title VII, the claimant must show the existence of an employer-employee relationship. Here, Ms. McNeal does not allege that she was an employee of the Debtors – and she was not. Thus, as a matter of law, she cannot have a valid Title VII claim against the Debtors. Consequently, as set forth more fully herein, the Claim should be disallowed and expunged on this basis alone.

RELIEF REQUESTED²

3. By this Objection, the GUC Trust seeks entry of an order disallowing and expunging the Claim pursuant to section 502(b) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 3007(a) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), because the Claim fails to establish the threshold requirements of a Title VII claim.

4. The GUC Trust reserves its rights to seek disallowance and expungement of the Claim on any other basis under applicable law. For example, if necessary, the GUC Trust will show, among other things, that (i) at least some claims asserted by McNeal are time-barred, (ii)

¹ The EEOC Charge of Discrimination attached to McNeal’s Notice of Claim is both undated and unsigned. Debtors accept, for purposes of this motion only, that the attached Charge is the operative document.

² For purposes of this Objection, the GUC Trust requests the Court treat the facts alleged by McNeal as true. However, the GUC Trust reserves the right to challenge such factual allegations.

the allegations raised by McNeal are insufficient to satisfy any of the requisite elements of the asserted claims and thus cannot meet the *prima facie* standard to establish a claim under the Bankruptcy Code, and (iii) the damages asserted by McNeal are excessive as a matter of law.

JURISDICTION

5. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). *See, e.g., In re Sheehan Mem'l Hosp.*, 377 B.R. 63 (Bankr. W.D.N.Y. 2007); *In re Worldcom, Inc.*, No. 02-13533, 2006 WL 3860765 (Bankr. S.D.N.Y. Dec. 29, 2006); *In re Worldcom, Inc.*, No. 02-13533, 2005 WL 3875191 (Bankr. S.D.N.Y. Jun. 3, 2005); *In re The Leslie Fay Cos.*, 212 B.R. 747 (Bankr. S.D.N.Y. 1997); *In re Ionosphere Clubs, Inc.*, 103 B.R. 416 (S.D.N.Y. 1989).

BACKGROUND

6. McNeal was hired by Zerkel in June 2006. During her tenure at Zerkel, McNeal served as manager of a DMR Clothing store located at a General Motors' assembly plant in Shreveport, Louisiana. *See* Exhibit A at 5.

7. Brandy Riggs (“**Riggs**”) was a sales associate at Zerkel. According to McNeal, her Zerkel district manager prohibited her from disciplining Riggs for various misconduct, which included making racist comments about African-American customers to McNeal (who is African-American), because he was friends with Riggs' father.

8. McNeal also alleges that, during her employment at Zerkel, several customers, including some GM employees, made sexually explicit comments to her, and/or engaged in other forms of sexual harassment against her. She engaged in a “brief affair” with one GM employee but alleges that he harassed her before and after that affair. *See id* at 6.

9. McNeal filed sexual harassment complaints with entities other than Zerkel, including Debtors. She alleges that Zerkel terminated her in retaliation for filing the complaints. *See id.*

10. In late 2008 or early 2009, McNeal filed a charge of discrimination against the United Auto Workers with the EEOC (the “Charge”). At some point thereafter, McNeal amended the Charge to name Debtors as respondents.³

THE CLAIM

11. On or about November 11, 2009, Ms. McNeal filed a timely claim against the Debtors in the bankruptcy proceeding. *See Exhibit A.* In the Claim, Ms. McNeal asserts that she was discriminated against on the basis of race, sexually harassed and, ultimately, terminated in retaliation for complaining about the sexual harassment. The Claim is related to the same events that gave rise to the Charge and specifically incorporates the Charge.

ARGUMENT

12. For a prepetition claim to be valid, the claimant must demonstrate he possesses a right to payment and that the right arose prior to the filing of the bankruptcy petition. *See Olin Corp. v. Riverwood Int’l Corp. (In re Manville Forest Prods. Corp.)*, 209 F.3d 125, 128 (2d Cir. 2000). A right to payment is an enforceable obligation. *Pa. Dep’t of Pub. Welfare v. Davenport*, 495 U.S. 552, 559 (1990). Bankruptcy Rule 3001(f) further provides that a proof of claim is *prima facie* evidence of the validity and amount of such claim. If the claimant does not allege a sufficient legal basis for the claim, the claim is not considered *prima facie* valid, and the burden

³ The actual date of the original filing is unclear, but according to a letter from the EEOC, the Charge was filed before February 9, 2009. *See Exhibit A* at 8. By May 14, 2009, McNeal had amended the Charge to name Debtors as the Respondent. *See id.* at 3-4. On August 19, 2010, the EEOC issued a Notice of Right to Sue letter stating that more than 180 days had passed since the filing of the Charge, and the EEOC was terminating its processing of the Charge. *See Exhibit B.*

remains with the claimant to establish the validity of the claim. *In re Chain*, 255 B.R. 278, 280, 281 (Bankr. D. Conn. 2000); *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988).

13. “[T]he existence of an employer-employee relationship is a primary element of Title VII claims.” *Gulino v. N.Y. State Educ. Dep’t*, 460 F.3d 361, 370 (2nd Cir. 2006). In order to show that an individual is an “employee” under Title VII, plaintiff must demonstrate that show she was hired by the putative employer. *U.S. v. City of New York*, 359 F.3d 83, (2nd Cir. 2004); *see also Okoi v. El Al Israel Airlines*, 378 Fed. Appx. 9 (2nd Cir. 2010) (affirming district court’s refusal to permit plaintiff to amend complaint to bring Title VII claim against airlines because – given that he was not an employee of the airlines, he had no claim against the company); *Salamon v. Our Lady of Victory Hosp.*, 514 F.3d 217 (2nd Cir. 2008) (before engaging in fact-specific analysis of employer-employee relationship, court must find that plaintiff received remuneration from putative employer in exchange for work sufficient to demonstrate that she was a hired party); *Wang v. Office of Professional Medical Conduct*, 228 Fed.Appx. 17 (2nd Cir. 2007) (affirming dismissal of Title VII claims against two defendants where neither defendant had employed plaintiff). Absent such a showing, claimant cannot establish a legal basis for a Title VII claim.

14. Here, McNeal acknowledges that she was not an employee of the Debtors, but rather was an employee of Zerkel. *See* Exhibit A at 5 (“I was hired by David Zerkel”); *id* at 5-6 (describing Stephen Lerherman as the “DMR [Zerkel] District Manager” and stating that “Mr. Lerherman told me I was fired”). The Debtors did not hire her – Zerkel did. The Debtors did not terminate her – Zerkel did. Indeed, the Debtors did not control any aspect of the terms and conditions of McNeal’s employment – only Zerkel did. There simply was no employer/employee relationship between the Debtors and McNeal which could provide the basis

for a Title VII claim and McNeal does not assert otherwise. Thus, as a matter of law, McNeal cannot establish a valid legal right against the Debtors that gives rise to an enforceable obligation. Accordingly, the Claim is not *prima facie* valid and should be disallowed and expunged.

CONCLUSION

For the reasons set forth above, the GUC Trust requests entry of enter an order expunging the Claim and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
August 6, 2012

/s/ Stefanie Birbrower Greer
Barry N. Seidel (BS-1945)
Stefanie Birbrower Greer (SG-2898)
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
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MOTORS LIQUIDATION COMPANY, et al.,	:
f/k/a General Motors Corp., et al.	:
	:
Debtors.	:
	:
-----X	

Chapter 11 Case No.

09-50026 (REG)

(Jointly Administered)

**ORDER GRANTING OBJECTION TO PROOF
OF CLAIM NO. 29628 FILED BY TIESHA McNEAL**

Upon the objection to Proof of Claim Number 29628 (the “**Claim**”) dated April 12, 2012 (the “**Objection**”), 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**”), seeking entry of an order disallowing and expunging the Claim on the basis that such claim fails as a matter of law, 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 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 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, pursuant to section 502(b) of the Bankruptcy Code, the Claim is disallowed and expunged; 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

EXHIBIT A



UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK		PROOF OF CLAIM
<p>Name of Debtor (Check Only One)</p> <p><input checked="" type="checkbox"/> Motors Liquidation Company (f/k/a General Motors Corporation)</p> <p><input type="checkbox"/> MLCS, LLC (f/k/a Saturn, LLC)</p> <p><input type="checkbox"/> MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation)</p> <p><input type="checkbox"/> MLC of Harlem, Inc (f/k/a Chevrolet Saturn of Harlem, Inc)</p>	<p>Case No</p> <p>09-50026 (REG)</p> <p>09-50027 (REG)</p> <p>09-50028 (REG)</p> <p>09-13558 (REG)</p>	<p><u>Your Claim is Scheduled As Follows.</u></p> <div style="text-align: center; border: 1px solid black; border-radius: 50%; width: 100px; margin: 20px auto; padding: 5px;"> <p>THE GARDEN CITY GROUP, INC.</p> <p>NOV 18 2009</p> </div> <p>If an amount is identified above you have a claim scheduled by one of the Debtors as shown (This scheduled amount of your claim may be an amendment to a previously scheduled amount) If you agree with the amount and priority of your claim as scheduled by the Debtor and you have no other claim against the Debtor, you do not need to file this proof of claim form. EXCEPT AS FOLLOWS If the amount shown is listed as DISPUTED UNLIQUIDATED or CONTINGENT a proof of claim MUST be filed in order to receive any distribution in respect of your claim. If you have already filed a proof of claim in accordance with the attached instructions you need not file again.</p>
<p>NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case but may be used for purposes of asserting a claim under 11 U.S.C. § 503(b)(9) (see Item # 3) All other requests for payment of an administrative expense should be filed pursuant to 11 U.S.C. § 503</p>		
<p>Name of Creditor (the person or other entity to whom the debtor owes money or property) <u>Tiesha Mc Neal</u></p>	<p><input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim</p> <p>EEOC No. <u>461-2009-00708</u></p> <p>Court Claim Number: _____ (If known)</p> <p>Filed on <u>02-23-2009</u></p>	
<p>Name and address where notices should be sent</p> <p><u>Tiesha Mc Neal</u> <u>6700 Jefferson Paige Rd #328</u> <u>Shreveport, La 71119</u></p> <p>Telephone number <u>318-8344165</u></p> <p>Email Address <u>tdagirl@gmail.com</u></p>	<p><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</p> <p><input type="checkbox"/> Check this box if you are the debtor or trustee in this case</p>	
<p>Name and address where payment should be sent (if different from above)</p> <p style="text-align: center;">FILED - 29628</p> <p style="text-align: center;">MOTORS LIQUIDATION COMPANY</p> <p style="text-align: center;">F/K/A GENERAL MOTORS CORP</p> <p style="text-align: center;">SDNY # 09-50026 (REG)</p> <p>Telephone number _____</p>	<p><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</p> <p><input type="checkbox"/> Check this box if you are the debtor or trustee in this case</p>	
<p>1 Amount of Claim as of Date Case Filed, June 1, 2009 <u>\$ 1 million</u></p> <p>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. If all or part of your claim is asserted pursuant to 11 U.S.C. § 503(b)(9), complete item 5</p> <p><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.</p>	<p>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</p> <p>Specify the priority of the claim</p> <p><input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B)</p> <p><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)</p> <p><input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5)</p> <p><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)</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8)</p> <p><input type="checkbox"/> Value of goods received by the Debtor within 20 days before the date of commencement of the case - 11 U.S.C. § 503(b)(9) (§ 507(a)(2))</p> <p><input checked="" type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)()</p> <p style="text-align: right;">Amount entitled to priority</p> <p style="text-align: right;"><u>\$ 1 million</u></p> <p style="font-size: x-small;">*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment</p>	
<p>2 Basis for Claim <u>Race, Employment, Discrimination and Retaliation Claim</u> (See instruction #2 on reverse side) <u>See attached</u></p>	<p>3 Last four digits of any number by which creditor identifies debtor _____</p> <p>3a Debtor may have scheduled account as _____ (See instruction #3a on reverse side)</p>	
<p>4 Secured Claim (See instruction #4 on reverse side)</p> <p>Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information</p> <p>Nature of property or right of setoff <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Equipment <input checked="" type="checkbox"/> Other</p> <p>Describe <u>Discrimination, Race, Sex, Retaliation Fired</u></p> <p>Value of Property, \$ _____ Annual Interest Rate % _____</p> <p>Amount of arrearage and other charges as of time case filed included in secured claim, if any \$ _____</p> <p>Basis for perfection _____</p> <p>Amount of Secured Claim <u>\$ 1 million</u> Amount Unsecured \$ _____</p>	<p>6 Credits The amount of all payments on this claim has been credited for the purpose of making this proof of claim</p> <p>7 Documents Attach redacted copies of any documents that support the claim, such as promissory notes purchase orders, invoices, itemized statements or 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)</p> <p>DO NOT SEND ORIGINAL DOCUMENTS ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING</p> <p>If the documents are not available, please explain in an attachment</p>	
<p>Date <u>11-11-2009</u></p>	<p>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.</p> <p style="text-align: center;"><u>Tiesha Mc Neal</u></p>	
<p>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 Modified B10 (GCG) (12/08)</p>		<p>FOR COURT USE ONLY</p>

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor there may be exceptions to these general rules. The attorneys for the Debtors and their court-appointed claims agent, The Garden City Group, Inc., are not authorized and are not providing you with any legal advice.

A SEPARATE PROOF OF CLAIM FORM MUST BE FILED AGAINST EACH DEBTOR

PLEASE SEND YOUR ORIGINAL COMPLETED CLAIM FORM AS FOLLOWS: **IF BY MAIL** THE GARDEN CITY GROUP, INC., ATTN: MOTORS LIQUIDATION COMPANY CLAIMS PROCESSING, P.O. BOX 9386, DUBLIN, OH 43017-4286; **IF BY HAND OR OVERNIGHT COURIER** THE GARDEN CITY GROUP, INC., ATTN: MOTORS LIQUIDATION COMPANY CLAIMS PROCESSING, 5151 BLAZER PARKWAY SUITE A, DUBLIN, OH 43017. **ANY PROOF OF CLAIM SUBMITTED BY FACSIMILE OR E-MAIL WILL NOT BE ACCEPTED.**

THE GENERAL BAR DATE IN THESE CHAPTER 11 CASES IS NOVEMBER 30, 2009 AT 5:00 PM (PREVAILING EASTERN TIME)

Court, Name of Debtor, and Case Number

These Chapter 11 cases were commenced in the United States Bankruptcy Court for the Southern District of New York on June 1, 2009. You should select the debtor against which you are asserting your claim.

A SEPARATE PROOF OF CLAIM FORM MUST BE FILED AGAINST EACH DEBTOR

Creditor's Name and Address

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. Please provide us with a valid email address. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1 Amount of Claim as of Date Case Filed

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2 Basis for Claim

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if the debtor, trustee or another party in interest files an objection to your claim.

3 Last Four Digits of Any Number by Which Creditor Identifies Debtor

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor, if any.

To Debtor May Have Scheduled Account As

Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

4 Secured Claim

Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS below.) State the type and the value of property that secures the claim, attach copies of lien documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.

5 Amount of Claim Fulfilled to Priority Under 11 U.S.C. § 507(a)

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories the law limits the amount entitled to priority.

For claims pursuant to 11 U.S.C. § 503(b)(9), indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before June 1, 2009, the date of commencement of these cases. (See DEFINITIONS, below.) Attach documentation supporting such claim.

6 Credits

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the Debtor credit for any payments received toward the debt.

7 Documents

Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary FRBP 3001(c) and (d). If the claim is based on the delivery of health care goods or services, see instruction 2. Do not send original documents, as attachments may be destroyed after scanning.

Date and Signature

The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS

Debtor

A debtor is the person, corporation, or other entity that has filed a bankruptcy case. The Debtors in these Chapter 11 cases are:

- Motors Liquidation Company (f/k/a General Motors Corporation) 09-50026 (REG)
- MLCS, LLC (f/k/a Saturn, LLC) 09-50027 (REG)
- MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation) 09-50028 (REG)
- MLC of Harlem, Inc. (f/k/a Chevrolet Saturn of Harlem, Inc.) 09-13558 (REG)

Creditor

A creditor is the person, corporation, or other entity owed a debt by the debtor on the date of the bankruptcy filing.

Claim

A claim is the creditor's right to receive payment on a debt that was owed by the Debtor on the date of the bankruptcy filing. See 11 U.S.C. § 101(5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with The Garden City Group, Inc. as described in the instructions above and in the Bar Date Notice.

Secured Claim Under 11 U.S.C. § 506(a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be

paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Section 503(b)(9) Claim

A Section 503(b)(9) claim is a claim for the value of any goods received by the debtor within 20 days before the date of commencement of a bankruptcy case in which the goods have been sold to the debtor in the ordinary course of such debtor's business.

Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. § 507(a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted certain information. A creditor should redact and use only the last four digits of any social-security, individual's

tax-identification, or financial-account number, all but the initials of a minor's name and only the year of any person's date of birth.

Evidence of Perfection

Evidence of perfection may include a mortgage lien, certificate of title financing statement, or other document showing that the lien has been filed or recorded.

Acknowledgment of Filing of Claim

To receive acknowledgment of your filing from The Garden City Group, Inc., please provide a self-addressed, stamped envelope and a copy of this proof of claim when you submit the original claim to The Garden City Group, Inc.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.

Additional Information

If you have any questions with respect to this claim form, please contact Alix Partners at 1 (800) 414-9607 or by e-mail at claims@motorsliquidation.com.

INFORMATION



**U.S. Equal Employment Opportunity Commission
New Orleans Field Office**

1555 Poydras Street
Suite 1900
New Orleans, LA 70112
(504) 595-2826
TTY (504) 595-2958
FAX (504) 595-2884

Respondent GENERAL MOTORS
EEOC Charge No 461-2009-00708
FEPA Charge No

May 14, 2009

Tiesha S McNeal
6700 Jefferson Paige Road, #328
Shreveport, LA 71119

Dear Ms McNeal

This is with reference to your recent written correspondence or intake questionnaire in which you alleged employment discrimination by the above-named respondent. The information provided indicates that the matter complained of is subject to the statute(s) checked off below:

- Title VII of the Civil Rights Act of 1964 (Title VII)
- The Age Discrimination in Employment Act (ADEA)
- The Americans with Disabilities Act (ADA)
- The Equal Pay Act (EPA)

The attached EEOC Form 5, Charge of Discrimination, is a summary of your claims based on the information you provided. Because the document that you submitted to us constitutes a charge of employment discrimination, we have complied with the law and notified the employer that you filed a charge. Before we investigate your charge, however, you must sign and return the enclosed Form.

To enable proper handling of this action by the Commission you should:

- (1) Review the enclosed charge form and make corrections
- (2) Sign and date the charge in the bottom left hand block where I have made an "X". For purposes of meeting the deadline for filing a charge, the date of your original signed document will be retained as the original filing date.
- (3) Return the signed charge to this office.

Before we initiate an investigation, we must receive your signed Charge of Discrimination (EEOC Form 5). Please sign and return the charge within thirty (30) days from the date of this letter. Under EEOC procedures, if we do not hear from you within 30 days or receive your signed charge within 30 days, we are authorized to dismiss your charge and issue you a right to sue letter allowing you to pursue the matter in federal court.

- Please be aware that after we receive your signed Form 5, the EEOC will send a copy of the charge to the agency listed below as required by our procedures. If that agency processes the charge, it may require the charge to be signed before a notary public or an agency official. The agency will then investigate and resolve the charge under their statute.

Louisiana Commission On Human Rights
P O Box 94094
Baton Rouge, LA 70804

Please use the "EEOC Charge No " listed at the top of this letter whenever you call us about this charge Please also notify this office of any change in address or of any prolonged absence from home Failure to cooperate in this matter may lead to dismissal of the charge

Please also read the enclosed brochure, "What You Should Know Before You File A Charge With EEOC," for answers to frequently asked questions about employee rights and the EEOC process If you have any questions, please call me at the number listed below If you have to call long distance, please call collect

Sincerely,



Madeline Bealer
Investigator
(504) 595-2864

Office Hours Monday – Friday, 8 00 a m - 4 30 p m
www eec gov

Enclosure(s)

Copy of EEOC Form 5, Charge of Discrimination

Copy of EEOC Uniform Brochure, "What You Should Know Before You File A Charge With EEOC "

<p>CHARGE OF DISCRIMINATION</p> <p><small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small></p>	<p>Charge Presented To Agency(ies) Charge No(s)</p> <p><input type="checkbox"/> FEPA</p> <p><input checked="" type="checkbox"/> EEOC 461-2009-00708</p>
--	--

Louisiana Commission On Human Rights and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)	Home Phone (Incl. Area Code)	Date of Birth
Ms. Tiesha S. McNeal		04-28-1974

Street Address City, State and ZIP Code

6700 Jefferson Paige Road, #328, Shreveport, LA 71119

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others (If more than two, list under PARTICULARS below)

Name	No. Employees Members	Phone No. (Include Area Code)
GENERAL MOTORS	500 or More	(318) 603-3589

Street Address City, State and ZIP Code

7600 General Motors Blvd., Shreveport, LA 71129

Name	No. Employees Members	Phone No. (Include Area Code)

Street Address City, State and ZIP Code

<p>DISCRIMINATION BASED ON (Check appropriate box(es))</p> <p><input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN</p> <p><input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify below)</p>	<p>DATE(S) DISCRIMINATION TOOK PLACE</p> <p style="text-align: center;">Earliest Latest</p> <p style="text-align: center;">06-01-2006 02-23-2009</p> <p style="text-align: center;"><input type="checkbox"/> CONTINUING ACTION</p>
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THE PARTICULARS ARE (If additional paper is needed attach extra sheet(s))

I was hired by David Zerkel in June 2006 to be Manager of David Zerkel Sales Ltd d/b/a DMR Clothing Store at General Motors (GM) Shreveport, Louisiana Assembly Plant DMR Store provides uniforms for GM employees Brandy Riggs was hired as a Sales Associate and I was hired as DMR Store Manager

Morgan Johnson, UAW Local 2166 Union President, Alex Santana, UAW Local 2166 Union Representative, Mike Kenalt, Assistant to Alex Santana, Stephen Lehman, DMR District Manager, and Benny Riggs (Brandy Riggs father) are friends These five people are friends and told me that they wanted Brandy Riggs (White) to be the DMR Manager Mr Lehman and Mr Zerkel wouldn't allow me to discipline Ms. Riggs although she had attendance, work performance and disciplinary problems Ms Riggs referred to the Black customers as niggers Merlene Zerkel, wife of Davie Zerkel, told me the Union was angry when Brandy was fired in December 2006

(Continue on page 2)

<p>I want this charge filed with both the EEOC and the State or local Agency, if any I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures</p> <p>I declare under penalty of perjury that the above is true and correct</p> <p>_____</p> <p style="text-align: center;"><small>Date Charging Party Signature</small></p>	<p>NOTARY - When necessary for State and Local Agency Requirements</p> <p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief</p> <p>SIGNATURE OF COMPLAINANT</p> <p>_____</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month day, year)</p>
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CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To

Agency(ies) Charge No(s)

FEPA
 EEOC

461-2009-00708

Louisiana Commission On Human Rights

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s))

Around the time I was hired, Stephen Lehman, and Alex Santana, flirted with me, asked if I liked dancing on tables and dancing topless Marvin Sales and Mitchell Grimes, GM employees and Union Members sexually harassed me. Mr Sales and I had a brief affair which ended in February 2008 When the affair ended, he continued sexually harassing me and requested dates. Marvin talked about my body, how big his body parts were and wanted me to visit him at his home Mr Grimes showed me sexually offensive pictures and requested dates James Bush, a GM employee rubbed my arm and requested dates Mr Lehman made sexually offensive statements until the time of my termination

I filed sexual harassment complaints against Mr Sales and Mr Grimes with Mr Todd Hill, GM Security Department Supervisor I was told that all complaints against GM must be filed with Securiteas Security USA who provided security for GM Mr. Hill failed to take corrective action and said I shouldn't be so beautiful. I complained to Mr Gaylor Tice and Mark Johnson, GM Labor Relations Representatives, about the GM employees sexually harassing me. No corrective action was taken

Mr Lerherman told me I was fired on February 23, 2009 because they decided to move in a different direction

I believe I was discriminated against because of my race, Black, sex, female and in retaliation for complaining about discriminatory practices made illegal under Title VII of the Civil Rights Act of 1964, as amended

I want this charge filed with both the EEOC and the State or local Agency, if any I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief
 SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
 (month, day, year)

Date

Charging Party Signature

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (5/01)
2. **AUTHORITY.** 42 U S C 2000e-5(b), 29 U S C 211, 29 U S C 626, 42 U S C 12117
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws) Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of Without a written charge, EEOC will ordinarily not act on the complaint Charges under Title VII or the ADA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury), charges under the ADEA should ordinarily be signed Charges may be clarified or amplified later by amendment It is not mandatory that this form be used to make a charge

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements You will be told which agency will handle your charge When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge Under Section 704(a) of Title VII, Section 4(d) of the ADEA, and Section 503(a) of the ADA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act



**U.S. Equal Employment Opportunity Commission
New Orleans Field Office**

1555 Poydras Street
Suite 1900
New Orleans, LA 70112
(504) 595-2826
TTY (504) 595-2958
FAX (504) 595-2855

February 9, 2009

AGREEMENT TO MEDIATE

EEOC NUMBER 461-2009-00708

Charging Party Tiesha S McNeal
Respondent UA W AT GENERAL MOTORS

This is an agreement by the parties to participate in a mediation involving Tiesha S McNeal and UA W AT GENERAL MOTORS in the above referenced charge The parties understand that mediation is a voluntary process, which may be terminated at any time

The parties and, if they desire, their representatives and/or attorneys, are invited to attend a mediation session No one else may attend without the permission of the parties and the consent of the mediator(s)

The mediator(s) will not function as the representative of either party However, the mediator(s) may assist the parties in crafting a settlement agreement Each party acknowledges being advised to seek independent legal review prior to signing any settlement agreement

The Parties acknowledge that they have received a copy of the Mediation Fact Sheet

The parties acknowledge that the mediator(s) possesses the discretion to terminate the mediation at any time if an impasse occurs or either party or the mediator deems the case inappropriate for mediation

The parties recognize that mediation is a confidential process and agree to abide by the terms of the attached Confidentiality Agreement

The parties acknowledge that if a settlement is reached as a result of the mediation, the assigned mediator(s) is required to report to EEOC any benefits received This information is reported only for purposes of providing aggregate data to the EEOC for Mediation program evaluation purposes, and the individual terms of the agreement will not be disclosed to the public

x Tiesha S McNeal 11/11/09
Charging Party Date

Respondent Date

Charging Party Date
Representative

Respondent Date
Representative

EXHIBIT B

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Tiesha S. McNeal
6700 Jefferson Paige Road, #328
Shreveport, LA 71119

RECEIVED
AUG 23 2010

New Orleans Field Office
1555 Poydras Street
Suite 1900
New Orleans, LA 70112

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

Table with 3 columns: EEOC Charge No (461-2009-00708), EEOC Representative (Maple Thomas, Supervisory Investigator), Telephone No ((504) 595-2827)

(See also the additional information enclosed with this form)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different)

- More than 180 days have passed since the filing of this charge
Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge
The EEOC is terminating its processing of this charge
The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

- The EEOC is closing your case. Therefore, your lawsuit under the ADEA must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice. Otherwise, your right to sue based on the above-numbered charge will be lost.
The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office

On behalf of the Commission

Handwritten signature of Keith T. Hill

AUG 19 2010

Enclosures(s)

Keith T. Hill, Director

(Date Mailed)

cc: Jamie Takak
EEO Consultant for General Motors
BASHEN CORPORATION
1616 South Voss Road, Suite 300
Houston, TX 77057