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Company GUC Trust*

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

-----X  
: **Chapter 11 Case No.**  
: **09-50026 (REG)**  
: **(Jointly Administered)**  
: **Debtors.**  
: **(Jointly Administered)**  
: **(Jointly Administered)**  
: **(Jointly Administered)**  
-----X

**APPELLEE’S DESIGNATION OF ADDITIONAL ITEMS  
TO BE INCLUDED IN THE RECORD TO BE PRESENTED ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), as appellee, formed by the above-captioned debtors (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**”), respectfully submits the following designation of additional items (the “**Additional Designated Items**”) to be included in the record of the appeal filed by Atul C. Shah, MD (the “**Appellant**”) from the Bankruptcy Court’s decision read into the record at the hearing held on May 15, 2012 (Docket No. 11754), the Decision on Objection to Claim of Dr. Atul C Shah issued on August 6, 2012 (Docket No. 12001), and the related Order dated September 27, 2012 (Docket No. 12107). The GUC Trust requests that the Additional

Designated Items be included in the record to be presented on appeal to the District Court for the Southern District of New York in addition to the items designated by Appellant (Docket No. 12211). While it appears Appellant may have intended to include some of the Additional Designated Items in his submission, we include them here out of an abundance of caution to clarify the dates and descriptions of each item. The GUC Trust reserves the right to seek clarification of the statement of issues raised on appeal and to further supplement the record if necessary.

**ADDITIONAL DESIGNATED ITEMS<sup>1</sup>**

**Case No. 09-50026 (REG)**

<b>Item</b>	<b>Date</b>	<b>Docket No.</b>	<b>Description</b>
1.	4/12/12	11590	Objection to Claim Number 28820 filed by Atul Shah, filed by Barry N. Seidel on behalf of Motors Liquidation Company GUC Trust
2.	5/10/12	11696	Response to Debtors' Notice of Objection to Proof of Claim No. 28820 filed by Atul C. Shah
3.	5/10/12	11694	Reply to Response to Objection to Proof of Claim No. 28820 filed by Barry N. Seidel on behalf of Motors Liquidation Company GUC Trust
4.	5/17/12	11754	Transcript Regarding Hearing Held on 5/15/2012
5.	7/10/12	11923	Letter to Ms. Stefanie J. Greer Ref: Telephone Conversation Tuesday Morning on June 26, 2012 filed by Atul C. Shah
6.	8/6/12	12001	Decision on Objection to Claim of Dr. Atul C Shah signed on 8/6/2012
7.	8/6/12	12002	Endorsed Order signed on 8/6/2012 re: Dr. Shah's Motion to Vacate Judgment
8.	8/17/12	12019	Objection to the Proposed Order Disallowing and Expunging Proof of Claim Number 28820 filed by Atul C. Shah
9.	8/20/12	12020	Affidavit of Service of Letter from Stefanie Birbrower Greer, Dickstein Shapiro LLP, to The Honorable Robert E. Gerber, United States Bankruptcy Court, dated August 17, 2012, regarding Dr. Atul Shah

<sup>1</sup> To the extent any of the below listed documents contain exhibits or attachments that are not specifically designated, all such exhibits and attachments are included in this designation.

Item	Date	Docket No.	Description
10.	9/27/12	12106	Endorsed Order signed on 9/27/2012 "Deeming this to be a Motion for Re-Argument under LBR 9023-1 or for Amendment of Judgment under FRBP 9023 or 9024 (or FRCP 59 or 60, to which those Bankruptcy Rules Refer), Motion Denied." etc.
11.	9/27/12	12107	Order Sustaining Motion For Objection to Claim No. 28820 Filed by Atul Shah
12.	10/5/12	12162	Notice of Appeal (related document(s) 12108, 12107) filed by Atul C. Shah

Dated: New York, New York  
December 3, 2012

/s/ Stefanie Birbrower Greer  
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