

Entered Order:

Without in any way endorsing the timing of New GM's request, the Court believes, based on its independent review of the issues, that there is sufficient overlap to warrant consideration of them together, and that a decision on one has the potential to make the other moot. The hearing on April 4 will be continued and combined with the consideration of the other issues.

April 1, 2013

S/RET
USB
4/2/2013

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By Electronic Mail and By Hand

Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *In re Motors Liquidation Company*, Case No. 09-50026 (REG): Official Committee of Unsecured Creditors' First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief (Docket No. 7859)

Motors Liquidation Company GUC Trust v. Appaloosa Investment Ltd. Partnership I, et al., Adv. Pro. No. 12-09802

New GM Administrative Claim Hearing – April 4, 2013

Dear Judge Gerber:

We write on behalf of the GUC Trust in response to New GM's request for an indefinite adjournment of the hearing to consider the GUC Trust's objection to New GM's administrative expense claim (the "**Objection**"). As explained to New GM in writing more than one week ago, it remains the GUC Trust's position that there is no substantive overlap between the untimeliness of New GM's administrative expense claim and the Rule 60(b) issues noted in New GM's April 1 letter. Moreover, New GM is well aware of the GUC Trust's strong interest in resolving all claims that are capable of resolution as quickly as possible.

We find the timing of New GM's letter to the Court troubling. While New GM has known for over a week that the GUC Trust would not consent to New GM's adjournment request, it wasn't until today, when the two lawyers principally responsible for prosecuting the Objection were unreachable for religious reasons, that New GM's letter was submitted to the Court. If New GM persists in its request for an adjournment of the Objection, Messrs. Fisher and Berger (who return to the office on April 3rd) will oppose such request on behalf of the GUC Trust.

DICKSTEINSHAPIRO_{LLP}

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We thank the Court for its attention to this matter.

Respectfully,

/s/ Barry N. Seidel

Barry N. Seidel

cc: Arthur Steinberg
Bruce Zirinsky
Sean O'Donnell
Steven Reisman