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ATTORNEYS FOR BALLARD MATERIAL PRODUCTS INC.

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

In re:

GENERAL MOTORS CORP., *et al*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND DEMAND FOR
SERVICE OF PAPERS BY DORSEY & WHITNEY LLP
ON BEHALF OF BALLARD MATERIAL PRODUCTS INC.**

PLEASE TAKE NOTICE that Dorsey & Whitney LLP hereby appears as attorneys for Ballard Material Products Inc., creditor and interested party in the above-captioned chapter 11 cases. Pursuant to Section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Dorsey & Whitney LLP requests that all notices given or required to be given in these cases, and all papers served or required to be served in these case, be given and served upon the following persons at the addresses and numbers set forth below and requests that such persons be added to the mailing matrix on file with the Clerk of the Bankruptcy Court as follows:

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PLEASE TAKE NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, complaints, demands, disclosure statements, or plans of reorganization transmitted or conveyed by mail delivery, telephone, telegraph, telecopier, telex, electronic mail or otherwise, which affects the above-captioned debtors, property of such debtors.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers (this "Notice") nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other

than with respect to this notice, (v) an election of remedy, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, setoffs, and recoupments are expressly reserved.

Dated: June 15, 2009
New York, New York

DORSEY & WHITNEY LLP

/s/ Michael Foreman
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