

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
	:	
In re	:	Chapter 11 Case No.
	:	
GENERAL MOTORS CORP., et al.,	:	09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
_____	X	

**OBJECTIONS OF
BURNS INTERNATIONAL INDUSTRIAL CONTRACTING CO.
TO DEBTOR'S INTENT TO ASSUME AND ASSIGN
EXECUTORY CONTRACTS AS TO CURE AMOUNTS**

Burns International Industrial Contracting Co. ("Burns") objects to the Debtor's intent to assume and assign executory contracts for the reason that the Debtor's notice recites incorrect cure amounts. Specifically, the cure amount for GM Contract ID TCS26495 totals not less than \$59,398.08. Burns will investigate its files further to make sure that no other contract cure amounts are inaccurate and will supplement this objection within five days if appropriate.

/s/John A. Ruemenapp

Weisman, Young & Ruemenapp, P.C.

30100 Telegraph Road, Suite 428

Bingham Farms, MI 48025

(248) 258-2700

jruemenapp@wyrpc.com

P34796

CERTIFICATE OF SERVICE

I hereby certify that on **June 15, 2009**, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

- David B. Aaronson david.aaronson@dbr.com
- Philip D. Anker philip.anker@wilmerhale.com
- Joel D. Applebaum japplebaum@clarkhill.com
- W. David Arnold darnold@rcolaw.com
- Karin F. Avery avery@silvermanmorris.com
- Marc M. Bakst mbakst@bodmanllp.com
- David J. Baldwin dbaldwin@potteranderson.com, bankruptcy@potteranderson.com
- Elizabeth Banda kwilliams@pbfcm.com
- William M. Barron wbarron@sgrlaw.com
- Robert L. Barrows rbarrows@wdblaw.com
- Robert N. Bassel ecfbassel@gmail.com
- Christopher Robert Belmonte cbelmonte@ssbb.com, pbosswick@ssbb.com
- Howard S. Beltzer hbeltzer@morganlewis.com
- Frederick A. Berg fberg@kotszangster.com
- Wanda Borges borgeslawfirm@aol.com
- Jean Winborne Boyles jboyles@jhvgmlaw.com, KCOLE@JHVGMLAW.COM
- Kimberly A. Brennan kab@mccarthylebit.com
- Lynn M. Brimer lbrimer@stroblpc.com, sfraser@stroblpc.com
- James L. Bromley maofiling@cgsh.com
- William J. Brown wbrown@phillipslytle.com
- Theresa V. Brown-Edwards bankruptcy@potteranderson.com
- Mark Edwin Browning BK-MBROWNING@OAG.STATE.TX.US, sherri.simpson@oag.state.tx.us
- Andrew P. Brozman andrew.brozman@cliffordchance.com, sarah.campbell@cliffordchance.com
- Adam D. Bruski adbruski@lambertleser.com
- Charles D. Bullock cbullock@sbplclaw.com
- James Christopher Caldwell ccaldwell@starkreagan.com
- John F. Carberry jcarberry@cl-law.com, dsantos@cl-law.com
- James C. Carignan carignan@pepperlaw.com
- James S. Carr KDWBankruptcyDepartment@kelleydrye.com
- George B. Cauthen george.cauthen@nelsonmullins.com, mary.wilkinson@nelsonmullins.com;brook.wright@nelsonmullins.com
- Babette A. Ceccotti bceccotti@cwsny.com, ecf@cwsny.com
- Teresa H. Chan kkansa@sidley.com;emcdonnell@sidley.com
- J Eric Charlton echarlton@hiscockbarclay.com

- Sarah M. Chen schen@lockelord.com
- Gloria M. Chon gloria.chon@kkue.com
- Jennifer Anne Christian jchristian@kelleydrye.com,
KDWBankruptcyDepartment@kelleydrye.com
- Marvin E. Clements agbanknewyork@ag.tn.gov
- Tiffany Strelow Cobb tscobb@vorys.com, cdfricke@vorys.com
- Dennis J. Connolly dconnolly@alston.com
- Michael T. Conway michael.conway@leclairryan.com
- Susan M. Cook smcook@lambertleser.com
- Dawn R. Copley dcopley@dickinsonwright.com, dnavin@dickinsonwright.com
- Trent P. Cornell tcornell@stahlcowen.com
- David N. Crapo dcrapo@gibbonslaw.com
- Randall D. Crocker rcrocker@vonbriesen.com
- Michael G. Cruse mcruse@wnj.com, hziegler@wnj.com
- Thomas H. Curran tcurran@haslaw.com, calirm@haslaw.com
- Teresa K.D. Currier tcurrier@saul.com, mflores@saul.com
- Vincent D'Agostino vdagostino@lowenstein.com
- Peter D'Apice dapice@sbep-law.com
- Renee M. Dailey renee.dailey@bgllp.com, megan.olsen@bgllp.com
- Colin Thomas Darke cdarke@bodmanllp.com
- James E. DeLine jed@krwlaw.com, pal@krwlaw.com
- Gabriel Del Virginia, Esq. gabriel.delvirginia@verizon.net
- Sam Della Fera sdellafera@trenklawfirm.com
- Melissa Detrick detrick@marshall-melhorn.com
- Benjamin P. Deutsch bdeutsch@schnader.com
- Frank W. DiCastrì fdicastro@foley.com
- Gerard DiConza gdiconza@dlawpc.com, las@dlawpc.com
- Amish R. Doshi adoshi@daypitney.com
- Mary Joanne Dowd dowd.mary@arentfox.com, rothleder.jeffrey@arentfox.com
- Kathryn E. Driscoll kdriscoll@pmppc.com
- Michael James Edelman mjedelman@vedderprice.com,
ecfnydocket@vedderprice.com
- Dan Elias delias@eliasgroup.com
- Judith Elkin judith.elkin@haynesboone.com
- Alyssa Englund aenglund@orrick.com
- Richard L. Epling richard.epling@pillsburylaw.com, gianni.dimos@pillsburylaw.com
- Belkys Escobar belkys.escobar@loudoun.gov
- Amy Evans aevans@crosslaw.com
- Kerry M Ewald kewald@dickinsonwright.com
- Stephen Vincent Falanga sfalanga@connellfoley.com
- Robert Michael Farquhar mfarquhar@winstead.com, whsu@winstead.com
- William L. Farris farrisw@sullerom.com
- Thomas R. Fawkes tfawkes@freebornpeters.com
- Carol A. Felicetta cfelicetta@reidandreige.com
- Alyson M. Fiedler afiedler@schiffhardin.com
- Robert J. Figa rfiga@comlawone.com

- Andrea Fischer afischer@olshanlaw.com, ssallie@olshanlaw.com;mmarck@olshanlaw.com
- Deborah L. Fish dfish@allardfishpc.com
- Elizabeth K. Flaagan eflaagan@faegre.com
- Daniel J. Flanigan dflanigan@polsinelli.com, tbackus@polsinelli.com
- Kenneth A. Flaska gm@dmms.com
- Jonathan L. Flaxer jflaxer@golenbock.com, ssmith@golenbock.com;avassallo@golenbock.com;eneuman@golenbock.com;mlu@golenbock.com
- Stephen B. Foley sfoley@sbfpc.com, kkish@sbfpc.com
- Shawn Randall Fox sfox@mcguirewoods.com
- Mark S. Frankel mfrankel@couzens.com
- Scott J. Freedman sfreedman@dilworthlaw.com
- Mark J. Friedman mark.friedman@dlapiper.com
- Victoria D. Garry vgarry@ag.state.oh.us
- Wendy J. Gibson wgibson@bakerlaw.com
- Jeanette M. Gilbert jgilbert@motleyrice.com
- Celeste R. Gill gillcr@michigan.gov, sherwoodj@michigan.com
- Steven A. Ginther sdneyecf@dor.mo.gov
- Andrew C. Gold agold@herrick.com
- Sonya N. Goll sgoll@sbplclaw.com
- Brett D. Goodman brett.goodman@troutmansanders.com, harriet.cohen@troutmansanders.com
- Robert D. Gordon rgordon@clarkhill.com
- Neil Andrew Goteiner ngoteiner@fbm.com, calendar@fbm.com;karentsen@fbm.com
- Brian M. Graham bgraham@salawus.com, bmgrahampack@sbcglobal.net
- Christopher F. Graham cgraham@mckennalong.com, jvargas@mckennalong.com;rgee@mckennalong.com;jmayes@mckennalong.com;ehall@mckennalong.com
- William T. Green uncbill@msn.com
- John T. Gregg jgregg@btlaw.com
- Stephen M. Gross sgross@mcdonaldhopkins.com
- Stephen B. Grow sgrow@wnj.com, kfrantz@wnj.com
- Elizabeth A. Haas info@thehaaslawfirm.com
- Paul R. Hage phage@jaffelaw.com
- Richard F. Hahn rfhahn@debevoise.com;jchung@debevoise.com;mao-ecf@debevoise.com
- Paula A. Hall hall@bwst-law.com, marbury@bwst-law.com
- Alan D. Halperin ahalperin@halperinlaw.net, cmitchell@halperinlaw.net;cbattaglia@halperinlaw.net;spark@halperinlaw.net
- Michael C. Hammer mchammer3@dickinsonwright.com
- Ryan D. Heilman rheilman@schaferandweiner.com
- Suzanne Hepner shepner@lrnpc.com, ecarder@lrnpc.com;jcahn@lrnpc.com;rbarbur@lrnpc.com;psherer@lrnpc.com
- Mark D. Hofstee markh@bolouselaw.com
- Michael S. Holmes , mshatty@yahoo.com

- Jonathan Hook jonathan.hook@haynesboone.com,
lenard.parkins@haynesboone.com;paul.fabsik@haynesboone.com
- P. Warren Hunt pwh@krwlaw.com
- John J. Hunter jrhunter@hunterschank.com, sharonaldrich@hunterschank.com
- Donald J. Hutchinson hutchinson@millercanfield.com
- Roland Hwang hwangr@michigan.gov
- Elihu Inselbuch eb@capdale.com
- Adam H. Isenberg aisenberg@saul.com
- Peter F. Jazayeri pjazayeri@ecjlaw.com
- Nan E. Joesten njoesten@fbm.com
- John J. Jolley jay.jolley@kutakrock.com
- Gregory O. Kaden gkaden@goulstonstorrs.com
- Stephen Karotkin
theodore.tsekerides@weil.com;Shai.Waisman@weil.com;Rachel.albanese@weil.com;mi
chele.meises@weil.com;ilusion.rodriguez@weil.com;nathan.pierce@weil.com;lacey.lake
n@weil.com
- Karel S. Karpe karpek@whiteandwilliams.com, yoderj@whiteandwilliams.com
- Andrew C. Kassner andrew.kassner@dbr.com
- Susan R. Katzoff skatzoff@hiscockbarclay.com, lmcrobbie@hiscockbarclay.com
- Thomas M. Kennedy tkennedy@kjmlabor.com
- Thomas L. Kent tomkent@paulhastings.com
- Richardo I. Kilpatrick ecf@kaalaw.com, lrobertson@kaalaw.com
- Jennifer B. Kimble jkimble@burr.com, mstinson@burr.com;mivey@burr.com
- Kathleen H. Klaus khk@maddinhauser.com
- Jeff Klusmeier jeff.klusmeier@ago.mo.gov
- Thomas F. Koegel tkoegel@flk.com
- Deborah Kovsky-Apap kovskyd@pepperlaw.com,
kressk@pepperlaw.com,wisotska@pepperlaw.com,alexsym@pepperlaw.com
- Debra A. Kowich dkowich@umich.edu, schmitzr@umich.edu
- Robert R. Kracht rrk@mccarthylebit.com
- Stuart A. Krause skrause@zeklaw.com
- J. Alex Kress akress@riker.com
- Patrick J. Kukla pkukla@carsonfischer.com
- Darryl S. Laddin bkrfilings@agg.com
- Michael C. Lambert mclambert@lawpost-nyc.com
- Stuart A. Laven slaven@bfca.com
- David S. Lefere davidl@bolhouselaw.com
- Michael S. Leib msl@maddinhauser.com, bac@maddinhauser.com
- David A. Lerner dlerner@plunkettcooney.com
- Larry A. Levick levick@singerlevick.com,
croote@singerlevick.com;ckirkland@singerlevick.com
- Barry E. Lichtenberg barryster@att.net
- David T. Lin dlin@seyburn.com
- Thomas K. Lindahl tlindahl@mcdonaldhopkins.com
- Edward J. LoBello elobello@msek.com
- Eric Lopez Schnabel schnabel.eric@dorsey.com

- Cynthia Jordan Lowery cynthialowery@mvalaw.com
- Kayalyn A. Marafioti kmarafio@skadden.com
- Michael A. Maricco maricco.michael@pbgc.gov, efile@pbgc.gov
- Richard W. Martinez Richardnotice@rwmapl.com, Clairenotice@rwmapl.com
- Jil Mazer-Marino jmazermarino@msek.com, kgiddens@msek.com
- Frank McGinn ffm@bostonbusinesslaw.com
- Barbara S Mehlsack bmehlsack@gkllaw.com
- Brian H. Meldrum bmeldrum@stites.com
- Marc B. Merklin mmerklin@brouse.com
- Christopher A. Merritt cmerritt@rjpls.com
- G. Christopher Meyer cmeyer@ssd.com
- Angela Z. Miller amiller@phillipslytle.com, jhahn@phillipslytle.com
- Harvey R. Miller harvey.miller@weil.com, garrett.fail@weil.com
- Joseph Thomas Moldovan bankruptcy@morrisoncohen.com, moldovanlb@morrisoncohen.com
- James P. Moloy jmoloy@dannpecar.com
- Timothy D. Moratzka tdm@mcmlaw.com
- Max Anderson Moseley mam@jbpp.com, mkd@jbpp.com
- Eric T. Moser eric.moser@klgates.com, kristen.serrao@klgates.com
- Jill L. Murch jmurch@foley.com, lapeterson@foley.com;khall@foley.com
- Jennifer L. Nassiri jennifer.nassiri@dlapiper.com
- Michael A. Nedelman mnedelman@nglegal.com, mwatler@nglegal.com;egloetzner@nglegal.com
- Melissa Z. Neier mneier@ibolaw.com
- Michael E. Norton mnorton@nortonlawassociates.com
- Gordon Z. Novod gnovod@kramerlevin.com, dcho@kramerlevin.com
- Sean A. O'Neal soneal@cgsh.com, maofiling@cgsh.com;jcroft@cgsh.com;skleinman@cgsh.com;ashajnfeld@cgsh.com;crodriguez@cgsh.com;sarobinson@cgsh.com
- Norman D. Orr norman.orr@kkue.com
- Mark Russell Owens mowens@btlaw.com, mowens@btlaw.com;bankruptcyindy@btlaw.com
- Ingrid S. Palermo ipalermo@hselaw.com
- Paul J. Pascuzzi ppascuzzi@ffwplaw.com
- Robert W. Phillips rphillips@simmonscooper.com
- James A. Plemmons jplemmons2@dickinsonwright.com
- Robert C. Pottinger rcpottinger@bslbv.com
- Susan Power-Johnston sjohnston@cov.com, jmcneil@cov.com
- Ronald S. Pretekin pretekin@coollaw.com, piatt@coollaw.com
- Jessica E. Price jprice@brouse.com
- Jonathan I. Rabinowitz jrabinowitz@rltlawfirm.com, ypalmeri@rltlawfirm.com
- Dennis Jay Raterink raterinkd@michigan.gov
- Eric T. Ray eray@balch.com
- Michael Reed nycourts@mvalaw.com
- Marc E. Richards mrichards@blankrome.com
- Michael P. Richman mrichman@pattonboggs.com

- Paul J. Ricotta pricotta@mintz.com
- David D. Ritter ecf@krcl.com, dritter@krcl.com
- Marianne Goldstein Robbins MGR@PREVIANT.COM,
MGR@PREVIANT.COM;EM@PREVIANT.COM
- Courtney Rogers crogers@orrick.com
- Adam L. Rosen filings@spallp.com, arosen@silvermanacampora.com
- Sanford Philip Rosen rpc@rosenpc.com, srosen@rosenpc.com
- Andrew Neil Rosenberg mtattnall@paulweiss.com
- Robert J. Rosenberg adam.goldberg@lw.com
- David A. Rosenzweig DRosenzweig@Fulbright.com
- Douglas B. Rosner drosner@goulstonstorrs.com
- Robert R. Ross rross@fedex.com
- George V. Royle george.royle@lw.com
- Scott K. Rutsky srutsky@proskauer.com
- Chester B. Salomon csalomon@beckerglynn.com,
aranade@beckerglynn.com;jholdridge@beckerglynn.com
- Diane W. Sanders austin.bankruptcy@publicans.com
- Thomas P. Sarb ecfsarbt@millerjohnson.com
- Thomas J. Schank tomschank@hunterschank.com, mcraig@hunterschank.com
- Kenneth M. Schneider smpcecf@gmail.com
- Carey D. Schreiber cschreiber@winston.com
- Matthew L. Schwartz matthew.schwartz@usdoj.gov
- Steven Schwartz sschwartz@winston.com
- Kenneth J. Schweiker kschweiker@brownconnery.com
- Stephen B. Selbst sselbst@herrick.com, courtnotices@herrick.com
- Jacob B. Sellers jacob.sellers@leonard.com
- David J. Selwocki brogers@swappc.com
- Joseph R. Sgroi jsgroi@honigman.com
- Mark H. Shapiro shapiro@steinbergshapiro.com
- Mary Kay Shaver mkshaver@varnumlaw.com
- Brian L. Shaw bshaw100@shawgussis.com
- Andrea Sheehan sheehan@txschoollaw.com,
coston@txschoollaw.com;asheel@yahoo.com;garza@txschoollaw.com
- Tricia A. Sherick tsherick@honigman.com
- Joseph E. Shickich jshickich@riddellwilliams.com
- Matthew J. Shier mshier@pinnaclelawgroup.com, mterry@pinnaclelawgroup.com
- Michael P. Shuster mpshuster@hahnlaw.com
- Robert Sidorsky sidorsky@butzel.com
- Rebecca H. Simoni rsimoni@vonbriesen.com, jpurpora@vonbriesen.com
- Christina C. Skubic bankruptcy@braytonlaw.com
- Edward Smith easmith@venable.com
- Robert T. Smith rsmith@cniinc.cc
- Richard G. Smolev rsmolev@kayescholer.com,
rrotman@kayescholer.com;maosbny@kayescholer.com;rcappiello@kayescholer.com
- Joseph H. Smolinsky Joseph.Smolinsky@weil.com

- Fredric Sosnick
karen.park@shearman.com,randy.martin@shearman.com,jennifer.lin@shearman.com,kerri.silver@shearman.com
- Arthur J. Spector aspector@bergersingerman.com,
jdiaz@bergersingerman.com;byglesia@bergersingerman.com;efile@bergersingerman.com
- Jeffrey S. Stein Jeff_Stein@gardencitygroup.com,
Kenneth_Freda@gardencitygroup.com;jennifer.keough@gardencitygroup.com
- Leslie Stein lstein@seyburn.com, seccles@seyburn.com
- Fred Stevens fstevens@foxrothschild.com
- Jason V. Stitt jstitt@kmklaw.com
- Harvey A. Strickon harveystrickon@paulhastings.com
- James M. Sullivan sullivan.james@arentfox.com, constantino.nova@arentfox.com
- Michelle T. Sutter msutter@ag.state.oh.us
- Marc N. Swanson swansonm@millercanfield.com
- Matthew A. Swanson matthew.swanson@leonard.com
- Colleen M. Sweeney csweeney@dickinsonwright.com
- Stanley B. Tarr tarr@blankrome.com
- Gordon J. Toering gtoering@wnj.com
- Jason M. Torf jtorf@schiffhardin.com, egeekie@schiffhardin.com
- Patrick J. Trostle ptrostle@jenner.com
- Raymond J. Urbanik rurbanik@munsch.com
- Shmuel Vasser shmuel.vasser@dechert.com
- Wendy S. Walker wwalker@morganlewis.com
- G. Alan Wallace gwall@fraserlawfirm.com
- Kimberly A. Walsh bk-kwalsh@oag.state.tx.us
- Sean M. Walsh swalsh@gmhlaw.com, jmahar@gmhlaw.com
- Robert B. Weiss rweiss@honigman.com
- Elizabeth Weller dallas.bankruptcy@publicans.com
- Michael R. Wernette mwernette@schaferandweiner.com
- David B. Wheeler davidwheeler@mvalaw.com
- Blanka K. Wolfe bwolfe@sheppardmullin.com
- Robert D. Wolford ecfwolfordr@millerjohnson.com
- Scott A. Wolfson wolfson@bsplaw.com,
recchia@bsplaw.com;stepp@bsplaw.com;ojala@bsplaw.com;bolton@bsplaw.com;kochis@bsplaw.com
- Cynthia Woodruff-Neer cwoodruff-neer@alpine-usa.com
- Janice M. Woolley janwoolley@mgwl.com
- Doron Yitzchaki dyitzchaki@dickinsonwright.com
- Terry L. Zabel ecf-tlz@rhoadesmckee.com

and I hereby certify that I have served the paper to the following non-ECF participants via

Federal Express (overnight delivery):

Debtors

c/o General Motors Corporation

Attn: Warren Command Center, Mailcode 480-206-114

Cadillac Building

30009 Van Dyke Avenue

Warren, MI 48090-9025

Attn: Harvey R. Miller, Esq

Weil, Gotshal & Manges, LLP

767 Fifth Avenue

New York, NY 10153

Attn: Matthew Feldman, Esq.

U.S. Treasury

1500 Pennsylvania Avenue NW, Room 2312

Washington, DC 20220

Attn: John J. Rapisardi, Esq.

Cadwalader, Wickersham & Taft LLP

One World Financial Center

New York, NY 10281

Attn: Michael L. Schein, Esq.

Vedder Price, P.C.

1633 Broadway, 47th Floor

New York, NY 10019

Attn: Diana G. Adams, Esq.

Office of the United States Trustee for the Southern District of New York

33 Whitehall Street, 21st Floor

New York, NY 10004