

Jeffrey L. Coxon  
Warren and Young PLL  
134 West 46<sup>th</sup> Street  
P.O. Box 2300  
Ashtabula, Ohio 4405-2300  
Tel: 440.997.6275  
Fax: 440.992.9114  
[jcoxon@warrenyoung.com](mailto:jcoxon@warrenyoung.com)

*Attorney for Molded Fiber Glass Companies*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
IN RE: )  
 ) Case No. 09-50026 (REG)  
 ) (Jointly Administered)  
GENERAL MOTORS CORP., *et al.* )  
 ) Chapter 11  
Debtors. )  
 )  
-----

**LIMITED OBJECTION OF MOLDED FIBER GLASS COMPANIES TO NOTICE OF  
(I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY  
CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY, AND UNEXPIRED  
LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II) CURE AMOUNTS  
RELATED THERETO**

Molded Fiber Glass Companies (“MFG”), by and through its undersigned counsel, hereby submits its limited objection (the “Limited Objection”) to the Notice of (I) Debtors’ Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the “Notice”).

In support of its Limited Objection, MFG states that on or about June 5, 2009, Debtors delivered the Notice to MFG indicating Debtors’ intent to assume and assign certain of Debtors’ agreements with MFG (the “MFG Assumed Contracts”). Debtors identify \$98,983.04 as the

proposed cure for the MFG Assumed Contracts (the “Proposed Cure Amount”). MFG has determined that the Proposed Cure Amount is less than the amount of prepetition defaults. Specifically, the Proposed Cure Amount does not include \$353,645.90 in additional prepetition defaults (the “Additional Cure Amount”). Attached as Exhibits A through F are invoices showing the Additional Cure Amount. MFG has no objection to the assumption and assignment of the MFG Assumed Contracts so long as the Additional Cure Amount is similarly paid.

WHEREFORE, MFG respectfully requests that the Court enter an Order compelling Debtors to increase the Proposed Cure Amount for the MFG Assumed Contracts to \$452,628.94.

DATED: June 15, 2009

Respectfully submitted,

/s/ Jeffrey L. Coxon \_\_\_\_\_

Jeffrey L. Coxon

Warren and Young PLL

134 West 46<sup>th</sup> Street

P.O. Box 2300

Ashtabula, Ohio 4405-2300

Tel: 440.997.6275

Fax: 440.992.9114

[jcoxon@warrenyoung.com](mailto:jcoxon@warrenyoung.com)

*Attorney for Molded Fiber Glass Companies*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Objection was served this 15<sup>th</sup> day of June, 2009, electronically via the Court's CM/ECF System on the parties registered thereto, and upon the following parties by properly addressed overnight mail:

General Motors Corporation  
Cadillac Building  
30009 Van Dyke Avenue  
Warren, MI 48090-9025  
Attn: Warren Command Center  
Mailcode 480-206-114

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153  
Attn: Harvey R. Miller, Esq.  
Stephen Karotkin, Esq.  
Joseph H. Smolinsky, Esq.

U.S. Treasury  
1500 Pennsylvania Avenue NW  
Room 2312  
Washington, D.C. 20220  
Attn: Matthew Feldman, Esq.

Cadwalader, Wickersham & Taft LLP  
One World Financial Center  
New York, NY 10281  
Attn: John J. Rapisardi, Esq.

Vedder Price, P.C.  
1633 Broadway, 47<sup>th</sup> Floor  
New York, NY 10019  
Attn: Michael J. Edelman, Esq.  
Michael L. Schein, Esq.

Office of the United States Trustee  
for the Southern District of New York  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, NY 10004  
Attn: Diana G. Adams, Esq.

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Attn: Kenneth H. Eckstein, Esq.

/s/ Jeffrey L. Coxon  
Jeffrey L. Coxon



MFG\*

CUSTOM INVOLVED BY FIBERGLASS REINFORCED PLASTIC

# MFG COMPOSITE SYSTEMS COMPANY

ASHTABULA, OHIO 44005-0675  
P.O. Box 675  
2925 MFG Place  
ASHTABULA, OHIO 44004

A/R (440) 994-5218



SHIP TO  
GM Disbursement Services  
Manual PO Support Workgroup  
PO Box 63070  
Phoenix, AZ 85082-3070 USA

SOLD TO  
GM Disbursement Services  
Manual PO Support Workgroup  
Phoenix, AZ 85082-3070

INVOICE	INVOICE DATE	CUSTOMER
009128	09/16/08	GM015

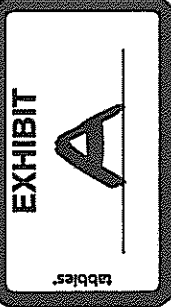
CUSTOMER'S ORDER NUMBER	SHIPPED VIA
C9X000KN	Best

PART NO.	M.F.G. PART NUMBER	DESCRIPTION	P.W.O. NUMBER	UNITS	UNIT PRICE	AMOUNT
	1100-0708	PO# C9X000KN-000 P/N 20791507 Panel 1 ASM-R/FLR preceded by P/N 25814284  Duna: 127205537				\$9,180.00
Please remit payment to: MFG COMPOSITE SYSTEMS CO P.O. BOX 71265 Main P.O. Cleveland, OH 44191						

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER RECEIPT OF GOODS. IN CASE OF ERROR, NOTIFY US AT ONCE. SELLER REPRESENTS THAT WITH RESPECT TO THE ARTICLES AND/OR PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 12(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

PLEASE PAY THIS AMOUNT \$9,180.00

DUPLICATE





MFG\*

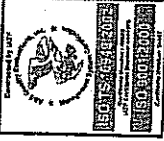
CUSTOM MOLDERS OF FIBERGLASS REINFORCED PLASTIC

# MFG COMPOSITE SYSTEMS COMPANY

P.O. Box 675  
ASHTABULA, OHIO 44005-0675

2925 MFG Place  
ASHTABULA, OHIO 44004

APR (440) 994-5218



SHIP TO  
GM Disbursement Services  
Manual PO Support Workgroup  
PO Box 63070  
Phoenix AZ 85082-3070 USA

SOLD TO  
GM Disbursement Services  
Manual PO Support Workgroup  
PO Box 63070  
Phoenix, AZ 85082-3070

INVOICE	INVOICE DATE	CUSTOMER
009098	05/30/08	GM015

CUSTOMER'S ORDER NUMBER	SHIPPED VIA
C9X000JB	Best

ITEM NO.	M.F.G. PART NUMBER	DESCRIPTION	PWO NUMBER	UNITS	UNIT PRICE	AMOUNT
	1100-0714	PO# C9X000JB- <del>000</del> P/N 25847936 GMX-245 R/Compt Tooling MFG DUNS: 127205537				\$16,300.00
Please Remit Payment to: MFG Composite Systems Co. PO 71265 Main P.O. Cleveland, OH 44191						

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER RECEIPT OF GOODS. IN CASE OF ERROR, NOTIFY US AT ONCE. SELLER REPRESENTS THAT WITH RESPECT TO THE ARTICLES AND/OR PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 12(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

PLEASE PAY THIS AMOUNT \$16,300.00

DUPLICATE

EXHIBIT

B

bbles



# MFG COMPOSITE SYSTEMS COMPANY

P.O. Box 675  
ASHTABULA, OHIO 44005-0675

2925 WIFE PLACE  
ASHTABULA, OHIO 44004

ARR (440) 994-5218



SHIP TO  
GENERAL MOTORS  
WILMINGTON ASSEMBLY  
BOXWOOD ROAD DOCK CCC  
WILMINGTON, DE 19899 USA

SOLD TO  
GENERAL MOTORS  
WILMINGTON ASSEMBLY  
BOXWOOD ROAD DOCK CCC  
WILMINGTON, DE 19899

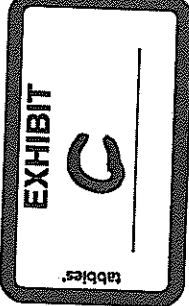
INVOICE	INVOICE DATE	CUSTOMER
009194	06/12/09	GEOME

CUSTOMER'S ORDER NUMBER	SHIPPED VIA
	BEST

ITEM NO.	M.F.G. PART NUMBER	DESCRIPTION	P.W.O. NUMBER	UNITS	UNIT PRICE	AMOUNT
	1100-0909	RFA MODULE BRACKET ADDED TO TUBS TOOLING BRACKET, RPT FIX. CHANGES (3) TOOLING ISSUED FOR GMX-020, GMX023, & GMX627 PART NUMBER #20834863 PURCHASE ORDER NUMBER OB12001P EWO-DVHXF DUNS-00127205537				36,001.00
PLEASE REMIT PAYMENT TO: MOLDED FIBER GLASS CO. P.O. BOX 71265, MAIN P.O. CLEVELAND, OH, 44191						

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER RECEIPT OF GOODS. IN CASE OF ERROR, NOTIFY US AT ONCE. SELLER REPRESENTS THAT WITH RESPECT TO THE ARTICLES AND/OR PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 12(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

PLEASE PAY THIS AMOUNT **36,001.00**



ORIGINAL



# MFG COMPOSITE SYSTEMS COMPANY

P.O. Box 675  
ASHTABULA, OHIO 44005-0675



A/R (440) 994-5218

**MFG\***

SHIP TO  
GENERAL MOTORS  
WILMINGTON ASSEMBLY  
BOXWOOD ROAD DOCK CCC  
WILMINGTON, DE 19899 USA

SOLD TO  
GENERAL MOTORS  
WILMINGTON ASSEMBLY  
BOXWOOD ROAD DOCK CCC  
WILMINGTON, DE 19899

INVOICE	INVOICE DATE	CUSTOMER
009192	06/12/09	GE002

CUSTOMER'S ORDER NUMBER	SHIPPED VIA
	BEST

ITEM NO.	M.F.G. PART NUMBER	DESCRIPTION	P.V.O. NUMBER	UNITS	UNIT PRICE	AMOUNT
	1100-0832	BUILD-UP STORAGE, OTHER EXTRANEQUS EXPENSE ITEMS. GMX-023 REAR TUB COST ASSOCIATED WITH BANK PARTS PART NUMBER 25880269 PURCHASE ORDER NO. OB-120031 DUNS # 00127205537				153,899.00
PLEASE REMIT PAYMENT TO: MOLDED FIBER GLASS CO. P.O. BOX 71265, MAIN P.O. CLEVELAND, OH, 44191						

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER RECEIPT OF GOODS IN CASE OF ERROR. NOTIFY US AT ONCE SELLER REPRESENTS THAT WITH RESPECT TO THE ARTICLES AND/OR PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 15(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

PLEASE PAY THIS AMOUNT

153,899.00

ORIGINAL

EXHIBIT

tabbles

D



**MFG COMPOSITE SYSTEMS COMPANY**

P.O. Box 675  
ASHTABULA, OHIO 44005-0675

2925 MFG Place  
ASHTABULA, OHIO 44004

A/R (440) 994-5218



**MFG\***

INVOICE	INVOICE DATE	CUSTOMER
009193	06/12/09	BG001

SHIP TO  
GM BOWLING GREEN  
INTERSTATE 65  
EXIT 28

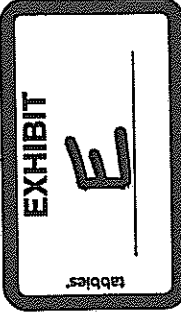
BOWLING GREEN, KY USA

SOLD TO  
CHEVROLET-PONTIAC-CANADA  
GM CORP. DISB.  
PO BOX 2011  
WARREN, MI 48090

CUSTOMER'S ORDER NUMBER	SHIPPED VIA

BFC-PRINT NETWORK - To Reorder, call: 216-932-2284

ITEM NO.	MFG. PART NUMBER	DESCRIPTION	PWO NUMBER	UNITS	UNIT PRICE	AMOUNT
	1199-0911	MANUFACTURING/ASSEMBLY PART AND OR TOOLS PURCHASE ORDER NO. C9X000KJ PART NO. GMX-245 Wheelhouse EWO: DGWNR DUNS#00127205537	TRYOUT.			17,655.90
PLEASE REMIT PAYMENT TO: MOLDED FIBER GLASS CO. P.O. BOX 71265, MAIN P.O. CLEVELAND, OH, 44191						

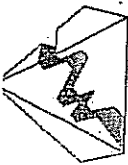


ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER RECEIPT OF GOODS. IN CASE OF ERROR, NOTIFY US AT ONCE. SELLER REPRESENTS THAT WITH RESPECT TO THE ARTICLES AND/OR PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 12(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

PLEASE PAY THIS AMOUNT  
17,655.90

ORIGINAL





**MFG\***

CUSTOM MOLDERS OF FIBERGLASS REINFORCED PLASTIC

**MFG COMPOSITE SYSTEMS COMPANY**

P.O. Box 675  
2925 MFG Place  
ASHTABULA, OHIO 44005-0675 ASHTABULA, OHIO 44004

A/R (440) 994-5218



SHIP GENERAL MOTORS  
TO WILMINGTON ASSEMBLY  
BOXWOOD ROAD DOCK CCC  
WILMINGTON, DE 19899 USA

SOLD GENERAL MOTORS  
TO WILMINGTON ASSEMBLY  
BOXWOOD ROAD DOCK CCC  
WILMINGTON, DE 19899

INVOICE	INVOICE DATE	CUSTOMER
009191	06/12/09	GENMOT

CUSTOMER'S ORDER NUMBER	SHIPPED VIA
	BEST

ITEM NO.	M.F.G. PART NUMBER	DESCRIPTION	P.W.C. NUMBER	UNITS	UNIT PRICE	AMOUNT
	1100-0831	MOLD TOOLING CHANGE, COOLING, RPT FINAL ASM, INSPECTION FIXTURES GMX-023 REAR TUB PART NUMBER #20787939 PURCHASE ORDER NUMBER #03-120030 DUNS# 00127205537				120,610.00

PLEASE REMIT PAYMENT TO: MOLDED FIBER GLASS CO.  
P.O. BOX 71265, MAIN P.O. CLEVELAND, OH, 44191

ALL CLAIMS MUST BE MADE WITHIN FIVE DAYS AFTER RECEIPT OF GOODS. IN CASE OF ERROR, NOTIFY US AT ONCE. SELLER REPRESENTS THAT WITH RESPECT TO THE ARTICLES AND/OR PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 12(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

PLEASE PAY THIS AMOUNT

120,610.00

ORIGINAL

EXHIBIT

F

Tables