Chester B Salomon (CS-2319)

BECKER, GLYNN, MELAMED & MUFFLY LLP

299 Park Avenue, 16th Floor New York, New York 10171 Telephone: (212) 888-3033

Facsimile: (212) 888-0255 csalomon@beckerglynn.com

Attorneys for Factory Motor Parts Company

LINITED STATES BANKRUPTCY COURT

| SOUTHERN DISTRICT OF NEW YORK       |   |                         |
|-------------------------------------|---|-------------------------|
|                                     | X |                         |
| In re:                              | : |                         |
|                                     | : | Chapter 11              |
| General Motors Corporation, et al., | : | -                       |
|                                     | : | Case No. 09-B-50026-reg |
| Debtors.                            | : |                         |
|                                     | X |                         |

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS

PLEASE TAKE NOTICE that Factory Motor Parts Company ("FMPC") enters its appearance by and through its counsel, Becker, Glynn, Melamed & Muffly LLP ("Becker Glynn") under 11 U.S.C. § 1109(b) of the United States Bankruptcy Code and Rules 2002, 3017(a), 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). Becker Glynn requests that all papers served or required to be served in this case and in any cases consolidated or administered herewith be given to and served upon, and that Becker Glynn be added to the mailing matrix on file with the Clerk of the Bankruptcy Court, as follows:

Chester B Salomon Becker, Glynn, Melamed & Muffly LLP 299 Park Avenue New York, New York 10171

Tel: (212) 888-3033 Fax: (212) 888-0255

Email: csalomon@beckerglynn.com

PLEASE TAKE FURTHER NOTICE that under 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any plan of reorganization and objections, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, personal delivery, telephone, telegraph, telex, facsimile, electronic mail or otherwise, which affect or seek to affect in any way any rights or interests of the debtors

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit will waive any of FMPC's substantive or procedural rights, including any right: (1) to have final orders in non-core matters entered only after *de novo* review by a United States District Court; (2) to trial by jury in any proceeding so triable in this case or in any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to which FMPC is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, or recoupments FMPC expressly reserves.

Dated: New York, New York June 1, 2009

## BECKER, GLYNN, MELAMED & MUFFLY LLP

Attorneys for Factory Motor Parts Company

By: /s/ Chester B Salomon Chester B Salomon (CS-2319) 299 Park Avenue New York, New York 10171

Tel: (212) 888-3033 Fax: (212) 888-0255

Email: <a href="mailto:csalomon@beckerglynn.com">csalomon@beckerglynn.com</a>

**CERTIFICATE OF SERVICE** 

I certify that on June 1, 2009, this office caused the **NOTICE OF** 

APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES AND

**DOCUMENTS** to be electronically filed with the Clerk of the United States Bankruptcy

Court for the Southern District of New York. I further certify that copies of the Notice

were also served upon all parties in interest via electronic notice.

Dated: New York, New York

June 1, 2009

By: /s/ Chester B Salomon

Chester B Salomon (CS-2319)