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ATTORNEYS FOR THE CITY OF DETROIT

**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)

**ADEQUATE ASSURANCE DEPOSIT REQUEST  
FROM THE CITY OF DETROIT**

NOW COMES Creditor, the City of Detroit, by and through counsel, Kilpatrick & Associates, P.C., and for its Adequate Assurance Deposit Request pursuant to the Order Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service ("Utilities Order") says as follows:

1. The City of Detroit, through the Board of Water Commission, ("City of Detroit") provides water and sewer services throughout southeastern Michigan and is therefore a Utility Company as provided for in the Utilities Order.
2. The Utilities Order includes the City of Detroit, listing two (2) different accounts.

3. The Utilities Order fails to include all locations and account numbers utilized by the City of Detroit for the Debtors. The City of Detroit is reconciling the account numbers and service addresses which include accounts not listed by the Debtors on the Utilities Order.

4. The City of Detroit is continuing research on all accounts attributable to the Debtors and attempting to determine the precise pre petition and post petition amounts due from the Debtors to the City of Detroit.

5. The Debtors have temporarily ceased operations at certain plants, and therefore, the post petition usage is not representative of average usage by the Debtors.

6. The City of Detroit estimates that two weeks of average water and sewer usage by the Debtors is \$85,000.00 based on accounts identified to date which the City of Detroit requests as an Adequate Assurance Deposit.

7. The City of Detroit reserves the opportunity to amend or supplement this Adequate Assurance Deposit Request.

WHEREFORE, the City of Detroit requests that the Debtors be required to escrow the amount of \$85,000.00 as adequate assurance for the City of Detroit and for such other and further relief as is just and necessary.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.  
Attorneys for City of Detroit

/S/ Richardo I. Kilpatrick  
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Dated: June 15, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Adequate Assurance Deposit Request for the City of Detroit was duly served to all registered parties through the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York and to the following via e-mail (where applicable), and by first-class mail postage prepaid to:

Mr. Pablo Falabella  
Weil, Gotshal & Manges LLP,  
767 Fifth Ave  
New York, NY 10153

General Motors Corp  
30200 Mound Road  
Engineering Bldg, M/C 480-111-W65  
Warren, MI 48090

/s/ Larissa M. Robertson  
Larissa M. Robertson  
An Employee of Kilpatrick & Associates

June 15, 2009