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Coastal Container Corporation
Vericorr Packaging of Coastal, LLC

**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)
: :
: Hon. Robert E. Gerber
-----X

**LIMITED OBJECTION BY COASTAL CONTAINER CORPORATION AND
VERICORR PACKAGING OF COASTAL, LLC 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**

Coastal Container Corporation and Vericorr Packaging of Coastal, LLC (collectively, the "Supplier"), by and through its attorneys, Varnum LLP, hereby files this limited objection to the Notice of (i) Debtors' Intent to Assume and Assign Certain Executory Contract, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (ii) Cure Amounts Related Thereto, dated June 5, 2009 (the "Assignment Notice") as follows:

1. On June 1, 2009, the Debtors commenced these voluntary cases under chapter 11 of title 11 of the United States Code.

2. On June 2, 2009, this Court entered an Order approving the Debtors' bidding procedure [Docket No. 274], which includes a procedure regarding the Debtors' assumption and assignment of executory contracts (the "Procedures Order").

3. The Supplier has been told that the Assignment Notice was sent to it on June 5, 2009 by the Debtors' call center; however, as of today's date, the Supplier has not received a copy and the call center has refused to provide the Supplier access to the website.

4. The Debtors owe the Supplier \$48,529.79 for prepetition goods and/or services provided to the Debtors under the Debtors' purchase orders and agreements with the Supplier (the "Supplier Cure Amount"). Attached as Schedule 1 is a listing of the invoices evidencing the Supplier Cure Amount. Copies are available upon request.

5. Out of an abundance of caution, the Supplier objects to the Assignment Notice to the extent that it does not accurately reflect the Supplier Cure Amount.

WHEREFORE, Creditor requests that the Court enter an order:

(A) Granting the Supplier a pre-petition cure amount for purposes of Section 365(b) of the Bankruptcy Code in the total amount of \$48,529.79 as a condition for the Debtors to assume and assign the Supplier Agreements pursuant to the Procedures Order; and

(B) Granting such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Varnum LLP

Dated: June 15, 2009

By: /s/ Mary Kay Shaver
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SCHEDULE 1

Listing of Unpaid Invoices

SCHEDULE 1

Listing of Unpaid Invoices

General Motors - Detailed invoice information and unapplied payments

June 2, 2009

| <u>Invoice #</u> | <u>PO#</u> | <u>Invoice Date</u> | <u>Original Invoice Amt</u> | <u>Amount Still Due</u> | <u>Packing Slip</u> |
|------------------|------------|---------------------|-----------------------------|-------------------------|---------------------|
| 1060701 | CX45542 | 9/25/2008 | 4,107.75 | 3,447.75 | 1058412 |
| 1060858 | CX 45542 | 10/9/2008 | 1,188.00 | 1,188.00 | 1058346 |
| 1060999 | | 10/10/2008 | (1,188.00) | (1,078.00) | |
| 1060925 | CX44542 | 10/17/2008 | 660.00 | 660.00 | 1058639 |
| 1060928 | CX-46781 | 10/17/2008 | 9,371.95 | 1,835.95 | 1058640 |
| 1060947 | CX-46781 | 10/20/2008 | 5,908.50 | 3,210.00 | 1058652 |
| 1060948 | CX-46781 | 10/20/2008 | 2,869.50 | 2,869.50 | 1058668 |
| 1061336 | CX-46781 | 12/3/2008 | 138.60 | 138.60 | 1059038 |
| 1061355 | CX-46781 | 12/4/2008 | 313.50 | 313.50 | 1059048 |
| 1061473 | CX-46781 | 12/23/2008 | 4,012.50 | 4,012.50 | 1059149 |
| 1061517 | CX-46781 | 1/8/2009 | 4,279.05 | (1,252.67) | 1059185 |
| 1061538 | CX-46781 | 1/15/2009 | 2,891.25 | 2,891.25 | 1059171 |
| 1061623 | CX-46781 | 2/2/2009 | 783.87 | 783.87 | 1059292 |
| 1061750 | CX-46781 | 2/19/2009 | 5,782.50 | 5,782.50 | 1059405 |
| 1061751 | CX-46781 | 2/19/2009 | 5,782.50 | 5,782.50 | 1059406 |
| 1061763 | CX-46781 | 2/23/2009 | 238.50 | 93.50 | 1059421 |
| Payment | | 12/1/2008 | (23,112.17) | (6,472.93) | |
| Payment | | 4/29/2009 | (26,195.30) | (1,298.00) | |
| Payment | | 5/26/2009 | (18,624.05) | (2,675.00) | |
| Payment | | 5/29/2009 | (9,891.00) | 942.00 | |
| 102811 | 11543 | 4/13/2009 | 78.54 | 78.54 | 102648 |
| 102832 | CX-46781 | 4/15/2009 | 1,510.78 | 1,510.78 | 102681 |
| 102891 | CX-59530 | 4/20/2009 | 4,992.40 | 4,992.40 | 102743 |
| 102911 | CX-59530 | 4/21/2009 | 4,357.00 | 4,357.00 | 102756 |
| 102948 | CX-46781 | 4/23/2009 | 383.75 | 230.25 | 102793 |
| 102964 | CX-59530 | 4/24/2009 | 2,226.60 | 2,226.60 | 102817 |
| 103075 | CX-59530 | 5/1/2009 | 1,783.00 | 1,783.00 | 102927 |
| 103100 | CX-59530 | 5/4/2009 | 4,457.50 | 4,457.50 | 102956 |
| 103120 | CX45542 | 5/5/2009 | 1,075.80 | 1,075.80 | 102973 |
| 103121 | CX-59530 | 5/5/2009 | 4,457.50 | 4,457.50 | 102981 |
| 103174 | CX-59530 | 5/7/2009 | 4,186.80 | 4,186.80 | 103023 |
| 103193 | CX45542 | 5/8/2009 | 330.00 | 330.00 | 103033 |
| 103213 | CX-59530 | 5/11/2009 | 2,395.80 | 2,395.80 | 103059 |
| 103344 | CX45542 | 5/19/2009 | 1,056.00 | 1,056.00 | 103179 |
| 103329 | | 5/20/2009 | (3,469.50) | (260.10) | |
| 103462 | | 5/28/2009 | (22,020.75) | (5,522.90) | |
| | | | | 48,529.79 | |