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Attorneys for BP Canada Energy Marketing Corp. and BP Energy Company

SOUTHERN DISTRICT OF NEW YORK		
In re:	)	Chapter 11
III IC.	,	Chapter 11

GENERAL MOTORS CORP., et al.,

Debtors.

UNITED STATES BANKRUPTCY COURT

## NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS AND REQUEST TO BE ADDED TO MASTER SERVICE LIST

Case No. 09-50026 (REG)

(Joint Administration Pending)

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned case on behalf of BP Canada Energy Marketing Corp. and BP Energy Company (collectively, "BP"), creditors, and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, demands that all notices given or required to be given and all papers served in this case be delivered to and served upon the party identified below at the following address and further requests to be added to the Master Service List:

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E-mail: <u>KDWBankruptcyDepartment@kelleydrye.com</u>

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the

Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in

the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders,

applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or

informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or

otherwise, in this case.

This Notice of Appearance and any subsequent appearance, pleading, claim, or

suit is not intended nor shall be deemed to waive BP's: (i) right to have final orders in non-core

matters entered only after de novo review by a district court judge; (ii) right to trial by jury in any

proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right

to have the reference withdrawn by the United States District Court in any matter subject to

mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or

recoupments to which BP is or may be entitled under agreements, at law, or in equity, all of

which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: New York, New York

June 1, 2009

KELLEY DRYE & WARREN LLP

By: /s/ James S. Carr

James S. Carr

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New York, New York 10178

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**Energy Company**