

BODMAN LLP
Marc M. Bakst (P41575)
6th Floor at Ford Field
1901 St. Antoine Street
Detroit, Michigan 48226
313-393-7530
mbakst@bodmanllp.com

ATTORNEYS FOR TECHFORM
PRODUCTS LIMITED

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	Chapter 11
GENERAL MOTORS CORPORATION, <i>et al.</i> ,	Case No. 09-50026 (Jointly Administered)
Debtors.	x

**OBJECTION BY TECHFORM PRODUCTS LIMITED TO
DEBTORS' PROPOSED CURE AMOUNTS**

Techform Products Limited (“Techform”) objects to Debtors’ proposed cure amounts related to their assumption and assignment of contracts with Techform, and in support of their objection, state:

Background

1. On June 1, 2009 (“Petition Date”), 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 Debtors’ bidding procedure [Docket # 274], which includes a procedure regarding Debtors’ assumption and assignment of executory contracts.

3. Delivery by Debtors to Techform of cure information regarding Debtors' 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 ("Assignment Notice"), was delayed until June 15, 2009. Thus, GM extended to June 19, 2009, the deadline for Techform to object to the cure amount. See Exhibit A – Email dated June 16, 2009 from Kimberly A. Yourchock of Honigman Miller Schwartz and Cohn.

4. Using the login information provided by Debtors, Techform has reviewed Debtors' web site with cure amount details (the "Proposed Cure Amounts").

5. The claims from the information available to the Techform on the web site does not match all the contracts and amounts under Techform's records.

6. Without limitation, the Proposed Cure Amount reflects an arbitrary and wrong deduction of about ten percent and fails to include an agreed pricing adjustment of \$8,259.69 for an ITW Sill Knob.

Cure Amount

7. The purchase orders and dollar amounts require further review by Debtors, and correction. Techform objects to the Proposed Cure Amount until such amount may be finally reconciled and agreed upon, or adjudicated, as the case may be. Further, the cure amount must cover the time period through assumption and assignment of the contracts, including any unpaid postpetition obligations.

8. Thus, Techform objects to the Proposed Cure Amount. Further, Techform reserves the right to amend this Objection and all other rights and remedies.

Relief Requested

Techform, therefore, respectfully requests that Debtors reconcile, correct and finalize the Proposed Cure Amount for the contracts with Techform to reflect all of the contracts to be assumed and assigned and the accurate amounts due and owing, as agreeable to Techform, including elimination of the arbitrary and wrong ten percent reduction and inclusion of the \$8,259.69 price adjustment for the ITW Sill Knob.

BODMAN LLP

By: / s / Marc M. Bakst

Marc M. Bakst (P41575)

Attorneys for Techform Products Limited

6th Floor at Ford Field

1901 St. Antoine Street

Detroit, Michigan 48026

mbakst@bodmanllp.com

(313) 393-7530

June 18, 2009

Bakst, Marc

From: Rob Mauro [RobM@Techform.com]
Sent: Thursday, June 18, 2009 1:11 PM
To: Bakst, Marc
Subject: FW: GM Command Center Issue ID: 2009.4474

Per our phone call.

Rob

-----Original Message-----

From: Yourchock, Kimberly A. [mailto:KYourchock@honigman.com]
Sent: Tuesday, June 16, 2009 1:04 PM
To: Vicky; supplier_command_center@gm.com
Cc: cindy.cordoba-koziol@gm.com; Patrick ; robh@techform.com; Rob Mauro; johnc@techform.com; gayleb@techform.com; Dana
Subject: RE: GM Command Center Issue ID: 2009.4474

Dana,

Given the circumstances and Techform's request for an extension. GM agrees to grant Techform an extension of the deadline to object to the assumption notice. The new deadline is Friday, June 19, 2009 at 5:00 p.m.

Please let me know if you have any questions or concerns.

Thank you,

Kim

Kimberly A. Yourchock
Honigman Miller Schwartz and Cohn LLP
(248) 506-9458

From: Vicky [mailto:vicky@connellyco.com]
Sent: Tuesday, June 16, 2009 1:00 PM
To: Yourchock, Kimberly A.; supplier_command_center@gm.com
Cc: cindy.cordoba-koziol@gm.com; Patrick ; robh@techform.com; Rob Mauro; johnc@techform.com; gayleb@techform.com; Dana
Subject: GM Command Center Issue ID: 2009.4474
Importance: High

Good afternoon.

Per the e-mail below, Techform is requesting an extension to the due date of the cure objection based on receiving the cover letter information yesterday, June 15, 2009. Please confirm what is the new due date. Thank you for your support.

Regards,
Dana Church
Commercial Project Mgr.
Techform Products Ltd.
(586) 977-0700, ext. 1014

From: summer.putnam@gm.com [mailto:summer.putnam@gm.com] **On Behalf Of**
supplier_command_center@gm.com

6/18/2009

Sent: Tuesday, June 16, 2009 11:25 AM
To: Vicky
Subject: GM Command Center Issue ID: 2009.4474

You submitted a question to the GM Call Center,

Issue: Requesting an extension to the due date of the cure objection.

Response: Please email a request to Kimberley Yourchock @ kyourchock@honigman.com and the supplier_command_center@gm.com requesting an extension.

If you have additional questions or do need to receive an additional copy of the Trade Agreement, please contact the GM Call Center (888)409-2328 or (586) 947-3000.

Thank you,

GM Command Center

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