

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

IN RE:

GENERAL MOTORS CORPORATION, *et al.*
Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

NOTICE OF RECLAMATION DEMAND BY HIRATA CORPORATION OF AMERICA

Hirata Corporation of America (“Hirata”), by and through its undersigned counsel, hereby gives notice that on June 18, 2009, Hirata served its written demand for reclamation (the “Demand”) upon (i) the Debtors, c/o General Motors Corporation, Cadillac Building, 30009 Van Dyke Avenue, Warren, MI 48090-9025, Attn: Warren Command Center, Mailcode 480-206-114; and (ii) the attorneys for Debtors at Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Nathan M. Pierce, Esq. A true and correct copy of the Demand is attached hereto as Exhibit 1.

Dated: June 18, 2009
Indianapolis, Indiana

BARNES & THORNBURG LLP

/s/ Mark R. Owens

Mark R. Owens
11 South Meridian Street
Indianapolis, Indiana 46204
Telephone: (317) 236-1313
Facsimile: (317) 231-7433

*Counsel for reclamation-creditor
Hirata Corporation of America*

CERTIFICATE OF SERVICE

I, Mark R. Owens, hereby certify that I caused a true and correct copy of the Notice of Reclamation Demand by Hirata Corporation of America to be filed via the Court's ECF System and served this 18th day of June, 2009. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system.

/s/ Mark R. Owens _____
Mark R. Owens

EXHIBIT 1

BARNES & THORNBURG LLP

Michael K. McCrory
(317) 231-7267
Email: mmccrory@btlaw.com

11 South Meridian Street
Indianapolis, IN 46204-3535 U.S.A.
(317) 236-1313
Fax (317) 231-7433

www.btlaw.com

June 18, 2009

VIA FEDERAL EXPRESS

The Debtors
c/o General Motors Corporation
Cadillac Building
30009 Van Dyke Avenue
Warren, MI 48090-9025
Attn: Warren Command Center
Mailcode 480-206-114

Weil Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Attn: Nathan M. Pierce, Esq.

RE: In re: General Motors Corporation, Cause No. 09-50026-reg
Reclamation Claim Demand of Hirata Corporation of America

To Whom it May Concern:

Our law firm represents Hirata Corporation of America (“Hirata”) and it has come to the attention of Hirata that on June 1, 2009 (the “Petition Date”) General Motors Corporation (“Debtor”) filed a voluntary petition commencing a case under Chapter 11 of Title 11 of the United States Code (“the Bankruptcy Code”) before the United States Bankruptcy Court for the Southern District of New York at Cause No. 09-50026-reg.

Demand is hereby made by Hirata pursuant to (i) the Order Pursuant to 11 U.S.C. §§ 105(a) and 546(c) Establishing and Implementing Exclusive and Global Procedures for Treatment of Reclamation Claims; (ii) 11 U.S.C. § 546(c); (iii) Section 2-702 of the Uniform Commercial Code and/or (iv) other applicable law, for the return of goods, consisting primarily of production equipment within the time period permitted for such reclamation. A true and correct copy of the invoice for the goods subject to this demand is attached hereto as Exhibit A and incorporated herein as if fully set forth at length.

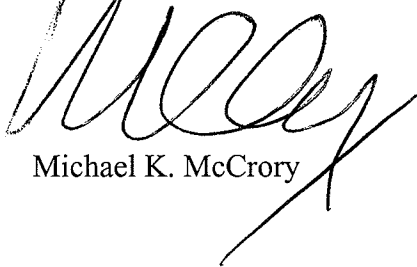
This amount represents the goods Hirata shipped to and received by Debtor within the forty-five (45) days preceding the Petition Date, at a time when Debtor was insolvent, and

General Motors Corporation
Reclamation Claim Demand
of Hirata Corporation of America
June 18, 2009
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twenty (20) days have not elapsed since the Petition Date. True and correct copies of the documents evidencing delivery of such goods are attached hereto collectively as Exhibit B and incorporated herein as if fully set forth at length. As of this date, Debtor has not remitted any payment to Hirata for these goods.

Please note this letter does not represent the total claim value of Hirata's business accounts. Nothing contained in this letter shall be a waiver of any rights, remedies and interests of Hirata. This demand for reclamation is without prejudice to all other rights, remedies and interests of and available to Hirata, at law or in equity, including but not limited to Hirata's right to an allowed administrative expense claim under section 503(b)(9) of the Bankruptcy Code for all goods received by the Debtor within twenty (20) days before the commencement of the Debtor's bankruptcy case. Should you have any questions regarding this request, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "McCrory", written over the typed name below.

Michael K. McCrory

cc: Steven Sherman (via e-mail)

INDS01 EBADAWI 1131575v1

EXHIBIT A

PACKING LIST/COMMERCIAL INVOICE

HIRATA CORPORATION OF AMERICA

47295 Cartier Drive

Wixom, MI 48393

TEL: (248) 624-5300

FAX: (248) 624-3300

SHIPPING DATE: 4/20/2009

HCA REF #: 7235.11

PURCHASE ORDER NO. RAS90676 022

SUPPLIER# 03-376-4283

COUNTRY OF ORIGIN: U.S.A.

PACKLING LIST / INVOICE #: 14

SHIPPING INSTRUCTIONS				Terms	REQUESTER		
FCA Hirata Wixom CONSIGNEE: (INVOICE TO) General Motors De Mexico S. DE RL DE CV Complejo Ramos Arizpe Atn. Cuentas Por Pagar Sucursal C De Correos Satillo, Coahuila CZ 25000				Deliver to: Tim Wilson @ GM Warren Phone: 248-343-7514 PSMI GMPT Warren Ship to: PSMI GMPT Ramos, General Motors Complejo Automotriz Ramos Arizpe Carretera Satijilo - Monterrey km 7.5 Ramos Arizpe, Coahuila, Mexico, CP25900 ATENCION: Hermilo Carrillo, 677075 - 6 Speed Transmission Assembly	Tim Wilson / Hermilo Carrillo		
CONSIGNOR: HIRATA CORPORATION OF AMERICA 47295 Cartier Drive Wixom, MI 48393 Attn: Tim Hileman TEL: (248) 624-5300 ext. 14 Federal ID Number 35-1485108							
ITEM	ORD	SHIP	B/O	DESCRIPTION	PART NUMBER	UNIT COST	TOTAL
1	2	1	0	GM Ramos 4/5 pin carrier detect unit		\$7,685.00	\$7,685.00
2	2	1	0	GM Ramos 3/4 pin reaction carrier detect unit		\$8,188.00	\$8,188.00
				Federal ID Number 35-1485108			
				REC BY:			
				NON-PRODUCTION MATERIAL			
				NUMBER OF PIECES	2		
				NUMBER OF CARTONS	1		
				Invoice Total (USD)			\$15,876.00
				WT. IN LBS.			Total wt. 20 lbs.
				WT IN KILOS			

These commodities, technology, or software were exported for the United States in accordance with its Export Administration Regulations. Diversion contrary to U.S. Law is prohibited.
 QUESTIONS CONCERNING THIS SHIPMENT SHOULD BE REFERRED TO: _____
 Mr. Tim Hileman

Total price as sold is 1,825,740 JPY
 Converted dollar amounts above are for shipping purposes

EXHIBIT B



Delivery Notification

Dear Customer,

This is in response to your request for delivery information concerning the shipment listed below.

Tracking Number: 1Z 456 497 03 9186 886 2
Reference Number(s): J7678, J7679
Service: GROUND
Weight: 26.00 Lbs
Shipped/Billed On: 04/30/2009
Delivered On: 05/01/2009 9:48 A.M.
Delivered To: 1255 BEACH CT
SALINE, MI, US 48176
Signed By: BURBANK

Location: DOCK

Thank you for giving us this opportunity to serve you.

Sincerely,
UPS

Tracking results provided by UPS: 05/04/2009 12:01 P.M. ET

PROOF OF DELIVERY FOR J-7678



World leader in production technology

Certificate of Acceptance

This certifies and confirms our satisfactory completion of the:

Hirata project #7235.02, GM PO #RAS90676 016, MECR# 7482

Hirata project #7235.03, GM PO #RAS90676 013, MECR# 7308

Hirata project #7235.10, GM PO #RAS90676 023, MECR# 7575

Hirata project #7235.11, GM PO #RAS90676 022, MECR# 7540

This certification constitutes the acceptance of the equipment by **Hirata Corporation of America and GM Ramos** and verifies that the equipment conforms to the agreed specification.

For and on behalf of
Hirata Corporation of America. (HCA)

Timothy W. Aheman

3/23/09

For and on behalf of
GM Ramos

Timothy M. Wilson

4/17/09

Signature

date