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Attorneys for Callin Campbell, Kevin Junso,
et al., Joseph Berlingieri, Edwin Agosto, and
Kevin Chadwick, *et al.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.
GENERAL MOTORS CORP., *et al.*, : 09-50026 (REG)
Debtors. : (Jointly Administered)
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**VERIFIED STATEMENT OF THE COLEMAN LAW FIRM
PURSUANT TO BANKRUPTCY RULE 2019**

The Coleman Law Firm (“Coleman”) respectfully submits this statement pursuant to Federal Rule of Bankruptcy Procedure 2019.

1. *Clients:* Coleman appears in these cases as special bankruptcy counsel for each of the parties identified below (collectively, the “Coleman Clients”) in connection with the bankruptcy cases filed by General Motors Corporation and its affiliates and subsidiaries (collectively, the “Debtors”):

- Callan Campbell
- The Estate of Tyler Junso, by and through the Personal Representative Kevin Junso, and, personally, Kevin Junso, Nikki Junso, Matt Junso, and Cole Junso

- Joseph Berlingieri
- Edwin Agosto
- Kevin Chadwick, individually and through his court-appointed curator, James H. Chadwick and James H. Chadwick and Judith Strode Chadwick, individually

2. *Nature and amount of claim and time of acquisition:* The Coleman Clients are each personal injury/product liability claimants of the Debtors. Further information about the claims and interests held by the Coleman Clients will be set forth in the Limited Objection to Debtors' Motion to Approve Section 363(f) Sale "Free and Clear" of Potential Successor Liability Claims against Purchaser.

3. *Pertinent facts and circumstances in connection with the employment of Coleman:* Steve Jakubowski and Elizabeth Richert of the Coleman Law Firm have filed applications to appear *pro hac vice* in this case. Coleman is currently representing the Coleman Clients in connection with their objection to the Debtors' proposed sale free and clear of successor liability claims. Coleman holds no ownership interest in the claims described above.

4. The undersigned has direct knowledge of the statements herein and verified that these statements are true and correct to the best of his knowledge and belief.

Dated: June 19, 2009

COLEMAN LAW FIRM

By: /s/ Steve Jakubowski

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