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*Counsel for Exel Inc., Exel Transportation Services, Inc.,
and Air Express International USA, Inc. (d/b/a DHL Global
Forwarding)*

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

In re:

GENERAL MOTORS CORP., *et al.*,
Debtors.

Case No. 09-50026 (REG)

Chapter 11

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE, that Exel Inc., Exel Transportation Services, Inc., and Air Express International USA, Inc. (d/b/a DHL Global Forwarding) (collectively, "**DHL**"), as parties-in-interest and creditors, hereby appear in the above-captioned matter by their counsel Sheppard Mullin Richter & Hampton LLP, and request, pursuant to sections 102(1), 342 and 1109(b) of title 11 of the United States Code (the "**Bankruptcy Code**") and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), that any and all notices given or required to be given in this case and all papers served or required to be served in this case, be delivered and served upon the following:

Sheppard Mullin Richter & Hampton LLP
Attn: Edward H. Tillinghast, III
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PLEASE TAKE FURTHER NOTICE, that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes without limitation, orders and notices of any application, motion, petition, pleading, request, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, messenger, overnight mail (e.g., Federal Express), telephone, telegram, facsimile or otherwise, which may affect or seek to affect in any way any of DHL's rights or interests, including without limitation, any disclosure statements and plans filed under chapter 11 of the Bankruptcy Code, and any other documents with respect to the Debtors' property or proceeds thereof in which the Debtors may claim an interest, as filed in these bankruptcy cases. *The undersigned also requests that the above referenced names and corresponding addresses be added to the mailing matrix for the Debtors in these bankruptcy cases.*

PLEASE TAKE FURTHER NOTICE, that neither this Notice of Appearance and Request for Service of Papers (the "**Notice**"), nor any other appearances, pleadings, proofs of claim, claims, or suits filed by DHL shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any case, controversy or proceeding, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs or

recoupments as appropriate, in law or in equity, under any agreements, all of which right, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: New York, New York
June 19, 2009

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: /s/ Blanka K. Wolfe

Blanka K. Wolfe (BW 0925)
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Counsel for Exel Inc., Exel Transportation Services, Inc., and Air Express International USA, Inc. (d/b/a DHL Global Forwarding)

*.Attorney is in the process of having legal name change recorded with all applicable government and judicial entities.

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2009, I caused a copy of the foregoing to be sent by first-class mail, postage prepaid, to the parties listed below, and by automatic ECF notice to those parties receiving ECF in the above-captioned case:

By: /s/ Blanka K. Wolfe
Blanka K. Wolfe

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