

KLEHR, HARRISON, HARVEY,
 BRANZBURG & ELLERS LLP
 Morton R. Branzburg (*Pro Hac Vice Admission Pending*)
 Brian T. Crowley (BC-2778)
 260 South Broad Street, Suite 400
 Philadelphia, PA 19102
 Telephone: (215) 568-6060

Attorneys for Manufacturers and Traders Trust Company

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK

Hearing Date: July 1, 2009 at 8:a.m.
 Objection Deadline: June 29, 2009 at 12:00 noon

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

**NOTICE OF MOTION SEEKING RELIEF FROM
 THE AUTOMATIC STAY, OR IN THE ALTERNATIVE GRANTING
 ADEQUATE PROTECTION OR THE TURNOVER OF CERTAIN PROPERTY**

PLEASE TAKE NOTICE that an Order will be presented on behalf of Manufacturers and Traders Trust Company (“M&T Bank”), by its attorneys, Klehr, Harrison, Harvey, Branzburg & Ellers LLP, to the Honorable Robert E. Gerber, United States Bankruptcy Judge, on July 1, 2009 at 8:00 a.m. The proposed Order, a copy of which is annexed hereto, will seek to vacate, pursuant to 11 U.S.C. §§ 362(d) and 105, the automatic stay imposed by 11 U.S.C. § 362 with regard to certain vehicles held by the Debtors; or in the alternative (i) grant M&T Bank adequate protection of its interest in the vehicles, or (ii) the turnover of the vehicles to M&T Bank by the Debtors; all as more fully set forth in the Motion.

PLEASE TAKE FURTHER NOTICE that if you have good reason to object to the granting of the proposed Order, objections must be in writing, must comply with the Bankruptcy Rules and the Local Bankruptcy Rules, and must both (a) be filed with the clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, with a stapled copy delivered to the Chambers of the Honorable Robert E. Gerber, United States Bankruptcy Judge by the Objection Deadline, June 29, 2009 and (b) be served, so that they are actually received no later than the

Objection Deadline by: (i) counsel for M&T Bank, Klehr, Harrison, Harvey, Branzburg & Ellers LLP, 260 South Broad Street, Suite 400, Philadelphia, PA 19102, Attn: Morton R. Branzburg, Esq.; and (ii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, NY. If no proper objections are timely filed and served and if the Court is satisfied from the Motion that the moving party is entitled to the relief sought, the Court may sign the Order without further notice or a hearing.

If proper objections are timely filed and served, a hearing will be held before the United States Bankruptcy Court, One Bowling Green, Courtroom 621, New York, New York, on July 1, 2009 at 8:00 a.m.

Dated: June 22, 2009

KLEHR, HARRISON, HARVEY,
BRANZBURG & ELLERS LLP

By: /s/ Brian T. Crowley
Morton R. Branzburg (*Pro Hac Vice*
Admission Pending)
Brian T. Crowley (BC-2778)
260 South Broad Street, Suite 400
Philadelphia, PA 19102
Telephone: (215) 568-6060
Attorneys for Manufacturers and Traders
Trust Company

KLEHR, HARRISON, HARVEY,
BRANZBURG & ELLERS LLP
Morton R. Branzburg (*Pro Hac Vice Admission Pending*)
Brian T. Crowley (BC-2778)
260 South Broad Street, Suite 400
Philadelphia, PA 19102
Telephone: (215) 568-6060

Attorneys for Manufacturers and Traders Trust Company

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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

CERTIFICATE OF SERVICE

I, Brian T. Crowley, an attorney with the law firm of Klehr, Harrison, Harvey, Branzburg & Ellers LLP, hereby certify that I caused a true and correct copy of the Notice of Motion of Manufacturers and Traders Trust Company (“M&T Bank”) Seeking Relief from the Automatic Stay or the Turnover of Certain Property, to be served on all parties on the attached service list by first-class mail, postage prepaid by June 23, 2009.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2009

/s/ Brian T. Crowley
Brian T. Crowley

Wilmington Trust Company
Attn: Geoffrey J. Lewis
Rodney Square North
1100 North Market Street
Wilmington, DE 19890
(07320-0096/alh)

International Union, United Automobile,
Aerospace and Agricultural Implement
Workers of America (UAW)
Attn: Ron Gettlefinger
8000 East Jefferson
Detroit, MI 48214
(07320-0096/alh)

Deutsche Bank AG,
London As Fiscal Agent
Attn: Stuart Harding
Theodor-Heuss-Allee 70
Frankfurt, 60262
(07320-0096/alh)

Deutsche Bank AG,
London As Fiscal Agent
Attn: Stuart Harding
Winchester House
1 Great Winchester Street
London EC2N 2DB England
(07320-0096/alh)

International Union of Electronic, Electrical, Salaried,
machine and Furniture Workers-Communications
Workers of America (IUE-CWA)
Attn: Mr. James Clark
3461 Office Park Drive
Kettering, OH 45439
(07320-0096/alh)

International Union of Electronic, Electrical, Salaried,
machine and Furniture Workers-Communications
Workers of America (IUE-CWA)
Attn: Mr. James Clark
2701 Dryden Road
Dayton, OH 45439
(07320-0096/alh)

Bank of New York Mellon
Attn: Gregory Kinder
One wall Street
New York, NY 10286
(07320-0096/alh)

Bank of New York, Mellon
Attn: Gregory Kinder
Global Corporate Trust, 101
Barclay, 7W
New York, NY 10286
(07320-0096/alh)

Starcom Mediavest Group, Inc.
Attn: Laura Desmond
35n W. Wacker Drive
Chicago, IL 60601
(07320-0096/alh)

Delphi Corp.
Attn: Rodney O'Neal
5725 Delphi Drive
Troy, MI 48098
(07320-0096/alh)

Robert Bosch GmbH
Attn: Franz Fehrenbach
Robert-Bosch-Platz 1/ 70839
Gerlingen-Schillerhoehe, Germany
(07320-0096/alh)

Robert Bosch GmbH
Attn: Franz Fehrenbach
38000 Hills Tech Drive
Farmington Hills, MI 48331
(07320-0096/alh)

Lear Corp.
Attn: Robert Rossiter
21557 Telegraph Road
Southfield, MI 48033
(07320-0096/alh)

Renco Group, Inc.
Attn: Lon Offenbacher
1 Rockefeller Plaza, 29th Floor
New York, NY 10020
(07320-0096/alh)

Renco Group, Inc.
Attn: Lon Offenbacher
1401 Crooks Road
Troy, MI 48033
(07320-0096/alh)

Enterprise Rent a Car
Attn: Greg Stubblefiled
6929 N. Lakewood Ave.
Suite 100
Tulsa, OK 74117
(07320-0096/alh)

Enterprise Rent a Car
Attn: Greg Stubblefield
600 Corporate Park Drive
St. Louis, MO 63105
(07320-0096/alh)

Johnson Controls, Inc.
Attn: Stephen A. Roell
5757 N. Green Bay Avenue
Glendale, WI 53209
(07320-0096/alh)

Johnson Controls, Inc.
Attn: Stephen A. Roell
5757 N. Green Bay Avenue
Milwaukee, WI 53201
(07320-0096/alh)

Denso Corp.
Attn: Haruya Maruyama
24777 Denso Drive
Southfield, MI 48086
(07320-0096/alh)

TRW Automotive Holdings, Corp.
Attn: John Plant
12025 Tech Center Dr.
Livonia, MI 48150
(07320-0096/alh)

TRW Automotive Holdings, Corp.
Attn: John Plant
12001 Tech Center Drive
Livonia, MI 48150
(07320-0096/alh)

Magna International, Inc.
Attn: Don Walker
337 Magna Drive
Aurora, ON L4G 7K1 Canada
(07320-0096/alh)

American Axle & Mfg Holdings, Inc.
Attn: Richard Dauch
One Dauch Drive
Detroit, MI 48211-1198
(07320-0096/alh)

Maritz, Inc.
Attn: Steve Maritz
1375 North Highway Drive
Fenton, MO 63099
(07320-0096/alh)

Publicis Groupe S.A.
Attn: Maurice Levy
133 Ave des Champs Elysees
Paris, 75008 France
(07320-0096/alh)

Hewlett Packard Co.
Attn: Mike Nefkens
3000 Hanover Street
Palo Alto, CA 94304
(07320-0096/alh)

Hewlett Packard Co.
Attn: Mike Nefkens
500 Renaissance Center
MC:20A Detroit, MI 48243
(07320-0096/alh)

Interpublic Group of Companies, Inc.
Attn: Michael Roth
1114 Avenue of the Americas
New York, NY 10036
(07320-0096/alh)

General Motors Corporation
Attn: Warren Command Center
Mail Code 480-206-114
30009 Van Dyke Avenue
Warren, MI 48090-9025

Weil, Gotshal & Manges LLP
Attorneys for the Debtors
Attn: Harvey R. Miller, Esquire
Stephen Karotkin, Esquire
Joseph H. Smolinsky, Esquire
767 Fifth Avenue
New York, NY 10153

U.S. Treasury
Attn: Matthew Feldman, Esquire
1500 Pennsylvania Avenue NW
Room 2312
Washington, DC 20220

Cadwalader, Wickersham & Taft LLP
Attn: John J. Rapisardi, Esquire
Attorneys for the Purchaser
One World Financial Center
New York, NY 10281

Vedder Price, P.C.
Michael J. Edelman, Esquire
Michael L. Schein, Esquire
Attorneys for Export Development Canada
1633 Broadway, 47th Floor
New York, NY 10019

Office of the United States Trustee
Southern District of New York
Attn: Diana G. Adam, Esquire
33 Whitehall Street, 21st Floor
New York, NY 10004

The Chambers of the Honorable Robert E. Gerber
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green
New York, NY 10004

Kramer Levin Naftalis & Frankel LLP
Attorneys for the Official Committee of
Unsecured Creditors
Attn: Gordon Z. Novod, Esq.
1177 Avenue of the Americas
New York, NY 10036