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d/b/a Akebono Brake Corporation, Ambrake Corporation
d/b/a Akebono Brake, Elizabethtown Plant,
Amak Brake L.L.C. d/b/a Akebono
Brake, Glasgow Plant*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

GENERAL MOTORS CORP., et al.,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that STITES & HARBISON PLLC hereby appears in the above-captioned case on behalf of Akebono Corporation (North America) d/b/a Akebono Brake Corporation, Ambrake Corporation d/b/a Akebono Brake, Elizabethtown Plant, and Amak Brake L.L.C. d/b/a Akebono Brake, Glasgow Plant (collectively, “Akebono”), creditors and parties-in-interest.

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 2002 and 9010(b), demand is made that all notices given or required to be given, and all papers served or required to be served, be given and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand 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 applications, motions, petitions, pleadings, plans, disclosure statements, complaints or demands transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex or otherwise, which are filed or made with regard to the captioned cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that neither this Entry of Appearance nor any subsequent appearance, pleading, claim or suit, is intended to waive (i) the Akebono's right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) Akebono's right to a trial by jury in any proceeding or trial so triable herein or in any case, controversy or proceeding relating hereto, (iii) Akebono's right to have the reference withdrawn by the district court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which Akebono is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments Akebono expressly reserves. Further, this Entry of Appearance constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court, including without limitation, the jurisdiction of the Court to adjudicate non-core matters, all of which are reserved without prejudice.

Dated: June 1, 2009

Respectfully submitted,

s/ Brian H. Meldrum

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