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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re :
Chapter 11 :
General Motors Corporation, *et al.*, :
Case No. 09-50026 (REG) :
Debtors. : (Jointly Administered)
----- X

**WITNESS AND EXHIBIT LIST OF INTERNATIONAL
UNION, UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL
IMPLEMENT WORKERS OF AMERICA FOR HEARING ON SALE MOTION**

The International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (the “**UAW**”) hereby submit the following witness and exhibit list for the hearing (the “**Hearing**”) on the Debtors’ Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), And (m), And 365 And Fed. R. Bankr. P. 2002, 6004, And 6006, To (I) Approve (a) The Sale Pursuant To The Master Sale And Purchase Agreement With Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Free And Clear Of Liens, Claims, Encumbrances, And Other Interests; (B) The Assumption And Assignment Of Certain Executory

Contracts And Unexpired Leases; And (C) Other Relief; And (II) Schedule Sale Approval
Hearing [Docket No. 92].¹

Witness List

1. David Curson.
2. All witnesses designated or called by any other party.

Exhibit List

1. Declaration of David Curson.

Dated: June 25, 2009
New York, New York

Respectfully submitted,

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ Avram E. Luft
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¹ The UAW reserves the right to supplement this Witness List and Exhibit List as necessary and to introduce additional exhibits or call additional witnesses as may be necessary and appropriate at the Hearing.