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Attorneys for Ferrous Processing and Trading Company

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----x Chapter 11
In re: : Case No. 09-50026 (REG)
: :
GENERAL MOTORS CORPORATION, et al., : **NOTICE OF APPEARANCE**
: **AND REQUEST FOR**
: **SERVICE OF PAPERS**
Debtors. :
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PLEASE TAKE NOTICE that Schwartz, Lichtenberg LLP hereby appears as counsel for Ferrous Processing and Trading Company (“Ferrous”), and pursuant to Rules 2002, 3017(a), 9007, 9010 of the Federal rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in these cases, be transmitted to:

Barry E. Lichtenberg, Esq.
Schwartz, Lichtenberg LLP
420 Lexington Avenue, Suite 2400
New York, New York 10170
Telephone No.: (212) 389-7818
Facsimile No.: (212) 682-6511
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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code provisions specified above, but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed

by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that: (1) affects or seeks to affect in any way the rights or interest of Ferrous or any other party-in-interest in these cases, including (a) property of the estates of the above-captioned debtors and debtors in possession (the "Debtors"), or proceeds thereof, (b) claims against, or interest in, the debtors, (d) other rights or interest of creditors of the Debtors or other parties-in-interest in the cases or (e) property or proceeds thereof in the possession, custody, or control of others that the Debtors may seek to use; or (2) requires or prohibits, or seeks to require or prohibit, any act, delivery of any property, payment or other conduct by Ferrous or any other party-in-interest.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of Ferrous to (a) have final orders in non-core matters entered only after de novo review by a District Court judge, (b) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding in related to these cases, (c) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) any other rights, claims actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: June 25, 2009
New York, New York

SCHWARTZ, LICHTENBERG LLP

By: /s/Barry E. Lichtenberg
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Attorneys for Ferrous Processing
and Trading Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was duly served by United States first class mail, postage prepaid and properly addressed, to all parties listed on the attached Service List and by electronic transmission to all registered ECF users appearing in the case on June 25, 2009.

/s/ Barry E. Lichtenberg
Barry E. Lichtenberg (BL 9750)

SERVICE LIST

COUNSEL FOR THE DEBTORS:

Weil Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Stephen Karotkin, Esq.

UNITED STATES TRUSTEE:

Office of the United States Trustee
Southern District of New York
33 Whitehall Street
New York, New York 10004