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 Of Family & Dissident GM Bondholders*

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

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

**EVIDENCE AND WITNESS LIST OF UNOFFICIAL COMMITTEE OF FAMILY AND
 DISSIDENT GM BONDHOLDERS FOR THE HEARING TO CONSIDER DEBTORS’
 MOTION PURSUANT TO 11 U.S.C. §§ 105, 363(b), (f), (k), (m) AND 365, AND FED. R.
 BANKR. P. 2002, 6004, AND 6006, TO 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**

TO THE HONORABLE ROBERT E. GERBER
 UNITED STATES BANKRUPTCY JUDGE

The Unofficial Committee Of Family & Dissident GM Bondholders (the “F&D
 Committee”), by and through its undersigned counsel, by way of evidence and witness list for
 the Debtor’s 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 Approve (A) the Sale Pursuant to the Master Sale and

Purchase Agreement with Vehicle Acquisition Holdings, a U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interest; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and, hereby states:

WITNESSES

The F&D Committee may call as witnesses Frederick Henderson, CEO of General Motors Corp., (“GM”) and Harry Wilson of the U.S. Auto Task Force, live or by deposition. The F&D Committee reserves its rights to cross-examine witnesses called live or by declaration or affidavit by the Debtors or any other party. The F&D Committee reserves the right to amend or supplement this list upon review of discovery responses just now being provided, in rebuttal to any evidence presented at the hearing, or otherwise should the need present itself.

EXHIBITS

The F&D Committee may use the Affidavit of Frederick Henderson (Docket No. 21) and any amendments or supplements thereto, the Master Transaction Agreement, any of the documents contained on the Debtor’s exhibit list at the hearing on the Sale Motion, the Declaration of Harry Wilson (Docket No. 2577), and any of the exhibits introduced into evidence at the hearing by any party in interest or designated in advance as exhibits that may be introduced at the hearing by any party in interest. On June 26, 2009, the U.S. Auto Task Force produced thousands of pages of documents. Documents have been requested from the Debtors and are expected over the next day or two. The F&D Committee reserves the right to amend or supplement this list after it has had an opportunity to review such documents, or otherwise should the need present itself.

DEPOSITION DESIGNATIONS

The depositions of Michael Raleigh of GM, Frederick Henderson of GM, and Harry Wilson of the U.S. Auto Task Force are scheduled to be conducted on June 27, 28, and 29 respectively. The F&D Committee reserves the right to designate all or portions of the transcripts of such depositions.

Dated: June 26, 2009

PATTON BOGGS LLP

By: /s/ Michael P. Richman

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