BUTZEL LONG, a professional corporation Robert Sidorsky Eric B. Fisher 380 Madison Avenue New York, New York 10017 Telephone: (212) 818-1110 Facsimile: (212) 818-0494 <u>sidorsky@butzel.com</u> <u>fishere@butzel.com</u>

Thomas B. Radom (admitted *pro hac vice*) Max J. Newman (admitted *pro hac vice*) 41000 Woodward Avenue Bloomfield Hills, Michigan 48304 Telephone: (248) 258-1616 Facsimile: (248) 258-1439 <u>radom@butzel.com</u> <u>newman@butzel.com</u>

Attorneys for TK Holdings, Inc., Irvin Automotive Products, Inc., and Takata Petri AG

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

GENERAL MOTORS CORP., et al.

Case No. 09-50026 (REG)

Chapter 11

Debtors.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that the law firm of Butzel Long, a professional corporation,

by the undersigned, hereby appears as counsel for TK Holdings, Inc., Irvin Automotive Products,

Inc., and Takata Petri AG, pursuant to section 1109 of title 11 of the United States Code, 11

U.S.C. § 101 et seq., and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy

Procedure, and requests service of all notices and documents herein upon the following:

Robert Sidorsky, Esq. Eric B. Fisher, Esq. BUTZEL LONG, a professional corporation 380 Madison Avenue New York, New York 10017 Telephone: (212) 818-1110 Facsimile: (212) 818-0494 <u>sidorsky@butzel.com</u> fishere@butzel.com

Thomas B. Radom, Esq. Max J. Newman, Esq. BUTZEL LONG, a professional corporation 41000 Woodward Avenue Bloomfield Hills, Michigan 48304 Telephone: (248) 258-1616 Facsimile: (248) 258-1616 Facsimile: (248) 258-1439 radom@butzel.com newman@butzel.com

PLEASE TAKE FURTHER NOTICE that the foregoing request for service includes all pleadings of any kind, including, without limitation, all notices, applications, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted or conveyed, related in any way to the above-captioned debtors, their property, or their estates. The undersigned requests that their names be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Documents (the "Notice") nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedies, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly

reserved.

Dated: New York New York June 30, 2009

BUTZEL LONG, a professional corporation

By: /s/ Robert Sidorsky Robert Sidorsky, Esq. Eric B. Fisher, Esq. 380 Madison Avenue 22nd Floor New York, NY 10017 Tel.: (212) 818-1110 Fax: (212) 818-0494 sidorsky@butzel.com fishere@butzel.com

Thomas B. Radom, Esq. Max J. Newman, Esq. BUTZEL LONG, a professional corporation 41000 Woodward Avenue Bloomfield Hills, Michigan 48304 Telephone: (248) 258-1616 Facsimile: (248) 258-1616 Facsimile: (248) 258-1439 <u>radom@butzel.com</u> newman@butzel.com

Attorneys for TK Holdings, Inc., Irvin Automotive Products, Inc., and Takata Petri AG

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2009, I caused a copy of the foregoing to be sent by firstclass mail, postage prepaid, to the parties listed below, and by automatic ECF notice to those parties receiving ECF in the above-captioned case:

> <u>/s/ Robert Sidorsky</u> Robert Sidorsky

Weil, Gotshal & Manges LLP Attn: Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky 767 Fifth Avenue New York, New York 10153

Honigman Miller Schwartz and Cohn LLP
Attn: Joseph R. Sgroi Robert B. Weiss Tricia A. Sherick
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226

Patrick J. Trostle Jenner & Block LLP 919 Third Avenue, 37<sup>th</sup> Floor New York, New York 10022

United States Trustee Attn: Diana G. Adams Brian S. Masumoto 33 Whitehall Street, 21<sup>st</sup> Floor New York, New York 10004

Kramer Levin Naftalis & Frankel LLP Attn: Thomas Moers Mayer Gordon Z. Novod 1177 Avenue of the Americas New York, New York 10036