

Barry E. Bressler (*admitted pro hac vice*)
Richard A. Barkasy (*admitted pro hac vice*)
Benjamin P. Deutsch (BD-5435)
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, NY 10005-1101
Phone: (212) 973-8000
Fax: (212) 972-8798
*Attorneys for the Ad Hoc
Committee of Consumer Victims of General Motors*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
GENERAL MOTORS CORP., *et al.*, : Case No. 09-50026 (REG)
: :
Debtors. : (Jointly Administered)
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**JOINT STATEMENT REGARDING TREATMENT OF
SUCCESSOR LIABILITY ISSUES FROM THE AD HOC
COMMITTEE OF VICTIMS OF GENERAL MOTORS
AND OTHER PRODUCT LIABILITY CLAIMANT ADVOCATES**

It is our understanding that the sale documents currently provide for the following with regard to successor liability claims:

- **Treatment of “Future Claimants”: (Product Liability)**
 - Group consists of claimants whose “Triggering Liability Event” (*i.e.*, date of accident or event giving rise to personal injury or damage to property) occurs post-closing regardless of when vehicle was purchased.
 - These Claims will be assumed and paid by New GM.
- **Treatment of “Post-Petition Claimants”: (Product Liability)**
 - Group consists of claimants whose Triggering Liability Event occurs between the Petition Date (inclusive) and extending up through, but not including, the Closing Date.
 - These Claims will be afforded administrative claim priority and be paid by the estate.
- **Treatment of “Pre-Petition Existing Claimants”: (Product Liability)**
 - Group consists of claimants whose Triggering Liability Event occurred prepetition.
 - These claims are not being assumed by New GM and will be treated as general unsecured claims in the Debtors’ bankruptcy cases.
- **Asbestos Current and Future Claims and Environmental Claims”:**
 - Debtors position of current status is accurately set forth in their Statement.