

KLESTADT & WINTERS, LLP
Tracy L. Klestadt
Samir P. Gebrael
292 Madison Avenue, 17th Floor
New York, New York 10017
(212) 972-3000

Presentment Date:
August 11, 2009 at 12:00 p.m. (ET)

*Co-Counsel for Federal Republic of Germany,
Office of Defense Administration USA/Canada*

- and -

WKWILBURN P.C.
William Karl Wilburn, Esq.
4800 Montgomery Lane, Suite 700
Bethesda, Maryland 20814

*Co-Counsel for Federal Republic of Germany,
Office of Defense Administration USA/Canada*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
: Chapter 11
MOTORS LIQUIDATION COMPANY, :
et al., f/k/a GENERAL MOTORS CORP., : Case No. 09-50026 (REG)
et al., :
: (Jointly Administered)
: Debtors. :
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**NOTICE OF PRESENTMENT OF ORDER PURSUANT TO
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE COMPELLING THE PRODUCTION
OF DOCUMENTS BY, AND A DEPOSITION OF, THE DEBTORS**

PLEASE TAKE NOTICE, that Federal Republic of Germany, Office of Defense Administration USA/Canada, 11150 Sunrise Valley Drive, Reston, Virginia, 20191 (“**FRG**”), by their co-counsel, Klestadt & Winters, LLP, will present the annexed order compelling the production of documents by, and scheduling the depositions of individuals designated by the

Debtors and believed to have knowledge of the relevant matters, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, for signature and approval to the Honorable Robert E. Gerber, United States Bankruptcy Judge, Southern District of New York, at Room 621 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, on August 11, 2009 at 12:00 p.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE, that unless a written objection to the proposed order is filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official Website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Wordperfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers), and served in accordance with General Order M-242, and served upon Tracy L. Klestadt and Samir P. Gebrael, Klestadt & Winters, LLP, 292 Madison Avenue, 17th Floor, New York, New York 10017, to allow actual receipt of the foregoing by no later than August 7, 2009 at 5:00 p.m., the order may be signed.

PLEASE TAKE FURTHER NOTICE, that if timely objections are filed and served, or if the Court so directs, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct.

Dated: New York, New York
July 29, 2009

KLESTADT & WINTERS, LLP

By: /s/ Samir P. Gebrael

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