

**Opposition briefs may be filed on or before 8-19-2009**  
**No hearing is needed**  
**Motion may be decided on submissions**

United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, N.Y. 10004-1408

**Lead Case # 09-50026**

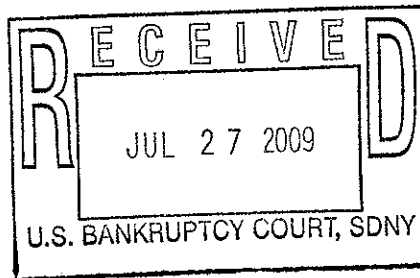
In Re:	)	
	)	Chapter 11
MOTORS LIQUIDATION COMPANY, et. al	)	<u>Case # 09-0950026</u>
	)	(Gerber)
(formerly General Motors Corp. et. al.)	)	Jointly Administered
	)	July 23, 2009

**MOTION TO GIVE ACCESS TO CERTAIN DOCUMENTS FILED UNDER SEAL**  
**AS WELL TO OTHER DOCKETED DOCUMENTS**

1.0 Comes now Radha R.M. Narumanchi, a Creditor of GM and one of appellants in the case<sup>1</sup> (appealing the decision and order dated 7-5-2009 issued by honorable Judge Gerber on Section 363 Sale). In the said papers filed by me, among other things, I have designated the following documents:

A. Any depositions taken of:

Harry Parker,  
Frederick Henderson,  
William C. Repko,  
J. Stephen Worth,  
Albert Koch, and  
Michael Raleigh.<sup>2</sup>



<sup>1</sup> My notice of appeal dated 7-7-2009 was docketed under # 3265, and my statement of issues and designation of contents dated 7-16-2009 was docketed under # 3266.

<sup>2</sup> It may be recalled here that as a *pro se* Creditor I was not given any access at all to any of the pre-evidentiary proceedings (that includes participating fully in depositions, discovery and requests for production of records) or even in the examination process of the witnesses during evidentiary hearings held on 6-30-2009, 7-2-2009 and 7-2-2009.

B. Evidentiary Hearing Transcripts dated 6-30-2009 (Docket # 3087), 7-1-2009 (# 3205), and 7-2-2009 (# 3062).<sup>3</sup>


2.0 I have noticed today that two depositions of **some unnamed individuals** were filed under seal, vide docket #s 3287 and 3288 of the court, by attorney Jakubowski. If any of the depositions filed by him in sealed envelopes contain depositions of any of the individuals identified earlier, in my appeal, no doubt I would like to have full access to them. **Hence, I would request this honorable court to give suitable instructions to the court staff to release such depositions for my viewing and copying.**

2.1 **I would also need such depositions in order to enable me to fully answer two sets of Motions to Dismiss filed by defendants<sup>4</sup> in my adversarial complaint # 09-00501.**<sup>5</sup>

Respectfully submitted.

Dated at New Haven, Conn. 06513, this 23<sup>rd</sup> day of July, 2009.

CREDITOR (Interested Party) & Appellant Pro Se

  
7/23/2009

(Radha R.M. Narumanchi)  
657 Middletown Avenue  
New Haven, Conn. 06513  
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Email: [rrm\\_narumanchi@hotmail.com](mailto:rrm_narumanchi@hotmail.com)

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<sup>3</sup> These documents are not to be released until 10-6-2009 as per the remarks noted in the said docket numbers.

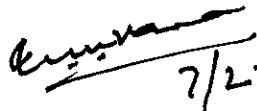
<sup>4</sup> It may be noted here that the federal government defendants (five in number) have neither filed their appearances nor any motions.

<sup>5</sup> In view of this, by sending a copy of this motion, I am requesting all other parties in my adversarial complaint # 09-00501 to please consent for a deferral (or postponement) of the date for filing my responses to 10-30-2009 and a scheduled hearing on pre-trial hearing (as well as the motions to dismiss) to 12-2-2009 (or a date that is suitable to the court) and with some date suitable to all other parties for filing their pleadings.

**Certification**

This is to certify that a copy of the aforementioned was mailed by first class mail, postage paid this 23rd day of July, 2009 to:

- 1) Weil, Gotshal & Manges LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, N.Y. 10153 - Attn: Harvey R. Miller/Stephen Karotkin/Joseph H. Smolinsky;
- 2) Cadwalader, Wickersham & Taft LLP, Attorneys for the Purchaser, One World Financial Center, New York, N.Y. 10281 - Attn: John J. Rapisardi;
- 3) Kramer Levin Naftalis & Frankel LLP, Attorneys for the Creditors Committee, Attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, N.Y. 10036, Attn: Kenneth H. Eckstein;
- 4) Cleary Gottlieb Steen & Hamilton LLP, Attorneys for the UAW, One Liberty Plaza, New York, N.Y. 10006 - Attn: James L. Bromley;
- 5) Cohen, Weiss and Simon LLP, Attorneys for the UAW, 330 West 42<sup>nd</sup> Street, New York, N.Y. 10036 - Attn: Babette Ceccotti;
- 6) Vedder Price, P.C., Attorneys for Export Development Canada, 1633 Broadway - 47<sup>th</sup> Floor, New York, N.Y. 10019 - Attn: Michael J. Edelman/Michael L. Schein;
- 7) Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> floor, New York, N.Y. 10004 - Attn: Diana G. Adams;
- 8) U.S. Attorney's General Office, S.D.N.Y., 86 Chambers Street - Third Floor, New York, N.Y. 10007 - Attn: David S. Jones/Matthew L. Schwartz.
- 9) The Coleman Law Firm, 77 West Wacker Drive, Suite 4800. Chicago, Ill. 60601  
Attn: Steve Jakubowski/Elizabeth Richert.
- 10) Courtesy Copy to the Chambers of Honorable Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, N.Y. 10004-1408

  
7/23/2009

(Radha R.M. Narumanchi)