

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: :  
Debtors. : (Jointly Administered)  
: :  
-----X  
: :  
KELLY CASTILLO, NICHOLE BROWN, : Adv. Proc. No. 09-00509  
BRENDA ALEXIS DIGIAN DOMENICO, : :  
VALERIE EVANS, BARBARA ALLEN, : Return Date: May 6, 2010  
STANLEY OZAROWSKI, AND DONNA :  
SANTI, : Time: 9:45 a.m.  
: :  
Plaintiffs, :  
: :  
v. :  
: :  
General Motors Company, f/k/a New General :  
Motors Company, Inc., :  
Defendant. :  
-----X  
: :  
GENERAL MOTORS LLC, :  
Counterclaimant, :  
: :  
v. :  
: :  
KELLY CASTILLO, NICHOLE BROWN, :  
BRENDA ALEXIS DIGIAN DOMENICO, :  
VALERIE EVANS, BARBARA ALLEN, :  
STANLEY OZAROWSKI, DONNA SANTI, :  
LAKINCHAPMAN LLC, ROBERT W. :  
SCHMIEDER, II, AND MARK L. BROWN, :  
Counterdefendants. :  
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**NEW GM'S MEMORANDUM IN OPPOSITION TO  
ATTORNEY COUNTERDEFENDANTS' MOTION TO DISMISS COUNTERCLAIMS**

Defendant and Counterclaimant General Motors LLC ("New GM") respectfully submits  
this memorandum in opposition to the Motion To Dismiss Counterclaims filed by

counterdefendants Robert W. Schmieder II, Mark L. Brown and LakinChapman LLC  
("Counterdefendants' Motion).

Because this motion is a virtual carbon copy of the Motion To Dismiss previously filed by plaintiffs, and in order not to burden the Court with a duplicative filing, New GM for its opposition to Counterdefendants' Motion hereby incorporates by reference, as if fully set forth herein, its Memorandum in Opposition to Plaintiffs' Motion To Dismiss Counterclaims filed herein on or about January 22, 2010.

New York, New York  
Dated: March 2, 2010

*/s/* Gregory R. Oxford

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