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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re

Chapter 11

Motors Liquidation Company., *et. al.*

Case No. 09-50026 (REG)

Debtors.

Jointly Administered

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**OBJECTION OF BMW GROUP TO DEBTORS' EIGHTH OMNIBUS MOTION  
PURSUANT TO 11 U.S.C. § 365 TO REJECT CERTAIN EXECUTORY CONTRACTS  
AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY**

BMW Hybrid Technology Corp. ("BMW Group"), by its undersigned counsel, hereby files its objection to the Debtors' Eighth Omnibus Motion Pursuant to 11 U.S.C. § 365 to Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property [Doc. No. 4291] (the "Rejection Motion").

1. The Debtors seek to reject a "Sublease Agreement (Troy Technology Park)" with the BMW Group as identified as line item 4A in the Leases section of Exhibit A to the Rejection Motion.

2. The BMW Group is not a party to a "Sublease Agreement" with any of the Debtors.

3. The BMW Group objects to the Rejection Motion as the Debtors are attempting to reject a contract that does not exist.

**Conclusion**

WHEREFORE, the BMW Group respectfully requests that the Court enter an Order: (i) denying the rejection of the “Sublease Agreement (Troy Technology Park)” with the BMW Group; and (ii) granting BMW Group such other and further relief as is appropriate.

Respectfully submitted by:

**JAFFE RAITT HEUER & WEISS, P.C.**

By: /s/ Richard E. Kruger  
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Dated: October 30, 2009.