

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
: **Chapter 11 Case No.**  
: **09-50026 (REG)**  
: **(Jointly Administered)**  
: **Debtors.**  
: **(Jointly Administered)**  
: **(Jointly Administered)**  
-----X

**NOTICE OF AGENDA OF MATTERS**  
**SCHEDULED FOR HEARING ON NOVEMBER 12, 2009 at 2:00 p.m.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, before the Honorable Robert E.  
Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling  
Green, New York, NY 10004-1408

**I. CONTESTED MATTERS:**

1. Debtors' Motion Pursuant to Sections 363(b) and 105 of the Bankruptcy Code and Bankruptcy Rule 9019(a) for Approval of Settlement Agreement with Certain Labor Unions [**Docket No. 4241**]

Response Deadline: November 6, 2009 at 4:00 p.m. and November 9,  
2009 at 4:00 p.m. (for Additional Notice Parties)

Response Filed:

- A. Statement of the IUE-CWA in Support of the Debtors' Motion Pursuant to Sections 363(b) and 105 of the Bankruptcy Code and Bankruptcy Rule 9010(a) for Approval of Settlement Agreement with Certain Labor Unions [**Docket No. 4395**]
- B. Objection to Settlement Filed by James Kurtz [**Docket No. 4419**]
- C. Response in form of a Letter filed by Thomas A. Chapman [**Docket No. 4420**]

Reply Filed: None to date.

Additional Document(s):

- D. Ex parte Motion of Debtors Pursuant to Fed. R. Bankr. P. 2002(a)(2) and 9006(c) to Shorten Notice Period with Respect to Debtors' Motion Pursuant to Sections 363(b) and 105 of the Bankruptcy Code and Bankruptcy Rule 9010(a) for Approval of Settlement Agreement with Certain Labor Unions [**Docket No. 4310**]
- E. Order Pursuant to Fed. R. Bankr. P. 2002(a)(2) and 9006(c) Shortening Notice Period With Respect to Debtors' Motion Pursuant to Sections 363(b) and 105 of The Bankruptcy Code and Bankruptcy Rule 9019(a) for Approval of Settlement Agreement With Certain Labor Unions [**Docket No. 4309**]

**Status:** This matter is going forward.

- 2. Motion of Creditor Brooke Alexis Love, a Minor, by and Through her Guardian Ad Litem, Sharon Butler, for Relief from the Automatic Stay to Allow the Continued Pursuit of an Insured Personal Injury Action and Request for Rule 9011 Sanctions [**Docket No. 4306**]

Response Deadline: N/A

Response Filed:

- A. Debtors' Opposition to the Motion of Brooke Alexis Love, a Minor, by and through Her Guardian Ad Litem, Sharon Butler, for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1)[**Docket No. 4384**]

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter is going forward.

## II. UNCONTESTED MATTERS:

- 3. Motion Pursuant to 11 U.S.C. § 362(d) to Modify the Automatic Stay Imposed by 11 U.S.C. § 362(a) filed by Nancy Grim [**Docket No. 4299**]

Response Deadline: N/A

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

**Status**: This matter is going forward. Debtors will present a Stipulation to the Court.

### III. ADJOURNED MATTERS:

4. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3212]**

Response Deadline: July 29, 2009 at 4:00 p.m.

Response Filed:

- A. Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3534]**

Reply Filed:

- B. Debtors' Reply to Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Person Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3585]**

Additional Document(s):

- C. Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors (2001 A-1 and 2001 A-2 Agreements Only) **[Docket No. 3619]**
- D. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3805]**
- E. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 4031]**

- F. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 4171**]

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

5. Motion of Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 4324**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

6. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreement and/or Abandonment of Equipment [**Docket No. 4328**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed:

- A. Limited Objection of Wachovia Financial Services, Inc. to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Equipment [**Docket No. 4401**]

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

7. Debtors' Motion to Assume and Assign Certain Unexpired Leases of Equipment and Related Executory Contracts [**Docket No. 4331**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed:

- A. Limited Objection of GE Capital Corporation and U.S. Bank, as Owner Trustee on its Behalf, to Debtors' Motion to Assume and

Assign Certain Unexpired Leases of Equipment and Related  
Executory Contracts [**Docket No. 4386**]

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

8. Application for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to have Knowledge of the Relevant Matters filed by Samir Gebrael on behalf of The Brittinghams [**Docket No. 3665**]

Response Deadline: August 13, 2009 at 5:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s):

- A. 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 filed by Samir Gebrael on behalf of The Brittinghams [**Docket No. 3664**]

**Status:** This matter has been adjourned to December 16, 2009 at 2:00 p.m.

Dated: November 10, 2009  
New York, New York

/s/ Stephen Karotkin

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

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Attorneys for Debtors  
and Debtors in Possession

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
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)  
: :  
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NOTICE OF AGENDA OF MATTERS  
SCHEDULED FOR HEARING ON NOVEMBER 12, 2009 at 2:00 p.m.

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,  
Alexander Hamilton U.S. Custom House, before the Honorable Robert E.  
Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling  
Green, New York, NY 10004-1408

I. CONTESTED MATTERS:

1. Debtors' Motion Pursuant to Sections 363(b) and 105 of the Bankruptcy Code and Bankruptcy Rule 9019(a) for Approval of Settlement Agreement with Certain Labor Unions [**Docket No. 4241**]

Response Deadline: November 6, 2009 at 4:00 p.m. and November 9,  
2009 at 4:00 p.m. (for Additional Notice Parties)

Response Filed:

- A. Statement of the IUE-CWA in Support of the Debtors' Motion Pursuant to Sections 363(b) and 105 of the Bankruptcy Code and Bankruptcy Rule 9010(a) for Approval of Settlement Agreement with Certain Labor Unions [**Docket No. 4395**]
- B. Objection to Settlement Filed by James Kurtz [**Docket No. 4419**]
- C. Response in form of a Letter filed by Thomas A. Chapman [**Docket No. 4420**]

Reply Filed: None to date.

Additional Document(s):

- D. Ex parte Motion of Debtors Pursuant to Fed. R. Bankr. P. 2002(a)(2) and 9006(c) to Shorten Notice Period with Respect to Debtors' Motion Pursuant to Sections 363(b) and 105 of the Bankruptcy Code and Bankruptcy Rule 9010(a) for Approval of Settlement Agreement with Certain Labor Unions [**Docket No. 4310**]
- E. Order Pursuant to Fed. R. Bankr. P. 2002(a)(2) and 9006(c) Shortening Notice Period With Respect to Debtors' Motion Pursuant to Sections 363(b) and 105 of The Bankruptcy Code and Bankruptcy Rule 9019(a) for Approval of Settlement Agreement With Certain Labor Unions [**Docket No. 4309**]

**Status:** This matter is going forward.

- 2. Motion of Creditor Brooke Alexis Love, a Minor, by and Through her Guardian Ad Litem, Sharon Butler, for Relief from the Automatic Stay to Allow the Continued Pursuit of an Insured Personal Injury Action and Request for Rule 9011 Sanctions [**Docket No. 4306**]

Response Deadline: N/A

Response Filed:

- A. Debtors' Opposition to the Motion of Brooke Alexis Love, a Minor, by and through Her Guardian Ad Litem, Sharon Butler, for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1)[**Docket No. 4384**]

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter is going forward.

## II. UNCONTESTED MATTERS:

- 3. Motion Pursuant to 11 U.S.C. § 362(d) to Modify the Automatic Stay Imposed by 11 U.S.C. § 362(a) filed by Nancy Grim [**Docket No. 4299**]

Response Deadline: N/A

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

**Status**: This matter is going forward. Debtors will present a Stipulation to the Court.

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4. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3212]**

Response Deadline: July 29, 2009 at 4:00 p.m.

Response Filed:

- A. Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3534]**

Reply Filed:

- B. Debtors' Reply to Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Person Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3585]**

Additional Document(s):

- C. Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors (2001 A-1 and 2001 A-2 Agreements Only) **[Docket No. 3619]**
- D. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3805]**
- E. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 4031]**

- F. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 4171**]

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

5. Motion of Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 4324**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

6. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreement and/or Abandonment of Equipment [**Docket No. 4328**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed:

- A. Limited Objection of Wachovia Financial Services, Inc. to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Equipment [**Docket No. 4401**]

Reply Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter has been adjourned to November 24 at 10:30 a.m.

7. Debtors' Motion to Assume and Assign Certain Unexpired Leases of Equipment and Related Executory Contracts [**Docket No. 4331**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed:

- A. Limited Objection of GE Capital Corporation and U.S. Bank, as Owner Trustee on its Behalf, to Debtors' Motion to Assume and

Assign Certain Unexpired Leases of Equipment and Related  
Executory Contracts [**Docket No. 4386**]

Reply Filed: None to date.

Additional Document(s): None to date.

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8. Application for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to have Knowledge of the Relevant Matters filed by Samir Gebrael on behalf of The Brittinghams [**Docket No. 3665**]

Response Deadline: August 13, 2009 at 5:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s):

- A. 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 filed by Samir Gebrael on behalf of The Brittinghams [**Docket No. 3664**]

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New York, New York

/s/ Stephen Karotkin

Harvey R. Miller  
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WEIL, GOTSHAL & MANGES LLP  
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Attorneys for Debtors  
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UNITED STATES BANKRUPTCY COURT  
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: **Chapter 11 Case No.**  
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Reply Filed: None to date.

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Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

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Response Deadline: November 6, 2009 at 4:00 p.m.

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Reply Filed: None to date.

Additional Document(s): None to date.

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