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Attorneys for Debtors and  
Debtors in Possession

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

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	:
<b>In re</b>	:
	:
<b>MOTORS LIQUIDATION COMPANY, et al.,</b>	:
<b>f/k/a General Motors Corp., et al.</b>	:
	:
<b>Debtors.</b>	:
	:
-----X	

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

**SUPPLEMENT TO MOTION OF DEBTORS FOR  
ENTRY OF ORDER PURSUANT TO 11 U.S.C. § 105(a) AND GENERAL  
ORDER M-390 AUTHORIZING IMPLEMENTATION OF ALTERNATIVE  
DISPUTE RESOLUTION PROCEDURES, INCLUDING MANDATORY MEDIATION**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), file this supplement (the “**Supplement**”) to their Motion for Entry of Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation, dated January 11, 2010 [Docket No. 4780] (the “**Motion**”), and respectfully state as follows:

1. As of the date the Motion was filed, the Debtors were in the process of evaluating potential mediators to serve on a panel of mediators at each of the Mediation and Arbitration Locations.<sup>1</sup> In that regard, the Debtors stated in the Motion that “a proposed schedule of mediators would be filed with this Court (with the curriculum vitae of each proposed mediator available from counsel for the Debtors upon request) no later than 10 days prior to the hearing.” (Mot. ¶ 12.)

2. Accordingly, annexed hereto as **Exhibit “A”** and incorporated herein by reference is the proposed schedule of mediators (the “**Schedule**”). The Debtors reserve their rights to supplement, amend, or modify the Schedule.

#### Notice

3. Notice of this Supplement has been provided to parties in interest in accordance with the Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated August 3, 2009 [Docket No. 3629]. The Debtors submit that such notice is sufficient and no other or further notice need be provided. No previous request for the relief sought in the Motion has been made by the Debtors to this or any other Court.

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<sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the Motion.

Dated: New York, New York  
January 29, 2010

/s/ Joseph H. Smolinsky

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Attorneys for Debtors

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## Exhibit A

### Dallas, Texas

<b>Name</b>	<b>Experience</b>
Burdin, Mary	Personal injury, products liability
Damuth, Brenda J.	Personal injury, products liability
Grissom, Jerry	Class actions, personal injury, products liability
Hale, Earl F.	Complex business disputes
Lopez, Hon. Carlos G.	Personal injury, products liability
Martin, Hon. Harlan	Complex business disputes, personal injury, products liability
Parker, Walter E. "Rip"	Personal injury, products liability, complex disputes
Rubenstein, Kenneth J.	Personal injury, products liability; complex disputes
Young, James	Class actions, complex business disputes, insurance disputes, personal injury

### Detroit, Michigan

<b>Name</b>	<b>Experience</b>
Connor, Laurence D.	Complex business disputes
Driker, Eugene	Complex business disputes, class actions
Harrison, Michael G.	Personal injury
Kaufman, Richard C.	Personal injury
Muth, Jon R.	Complex business disputes, class actions
Pappas, Edward H.	Complex business disputes, products liability
von Ende, Carl H.	Complex business disputes

### New York, New York

<b>Name</b>	<b>Experience</b>
Carling, Francis	Products liability, personal injury
Cyganowski, Melanie	Complex business disputes
Farber, Eugene I.	Products liability
Feerick, Kevin	Complex business disputes, products liability
Holtzman, Eric H.	Products liability
Hyman, Ms. Chris Stern	Insurance disputes
Leber, Bernice K.	Complex business disputes
Levin, Jack P.	Class actions, breach of warranty claims, products liability

### San Francisco, California

<b>Name</b>	<b>Experience</b>
Cowett, Hon. Patricia Ann Yim	Personal injury
Donnet, Toni-Diane	Consumer litigation, personal injury
Glavis, Greta	Personal injury, complex business disputes
Komar, Hon. Jack	Products liability class actions, mass torts
McPharlin, Linda Hendrix	Complex business disputes
Spieczny, Nancy J.	Personal injury
Tucker, William J.	Personal injury, complex business disputes
Wied, Colin W.	Complex business disputes, personal injury, products liability