

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----:  
In re: : Chapter 11  
: :  
GENERAL MOTORS, et al., : Case No. 09-50026 (REG)  
: :  
Debtors, : (Jointly Administered)  
: :  
-----:

**MOTION TO ADMIT COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael S. Kimm, a member of good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Francis Liu  
Kimm Law Firm  
41W Bancker Street  
Englewood, NJ 07631  
Telephone: 201-569-2880  
Fax: 201-569-2881

Francis Liu is a member in good standing of the Bar of the State of New Jersey. There are no pending disciplinary proceedings against Francis Liu in any State or Federal court.

Dated: February 18, 2010  
Englewood, New Jersey

Respectfully submitted,

  
\_\_\_\_\_  
Michael S. Kimm, Esq.  
SDNY Bar: MK4476  
Kimm Law Firm  
41W Bancker Street  
Englewood, NJ 07631  
Telephone: 201-569-2880  
Fax: 201-569-2881

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**DECLARATION OF MICHAEL S. KIMM IN SUPPORT OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

Michael S. Kimm, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiffs Sang Chul Lee and Dukson Lee. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein in and in support of Plaintiffs' motion to admit Francis Liu as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1992. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this court.

3. Mr. Liu is an associate attorney at the Kimm Law firm, and as such, he will be involved in all aspects of this case.

4. Mr. Liu passed the New York Bar Exam and is awaiting admission into the New York State Bar.

5. I respectfully submit a proposed order granting the admission of Francis Liu, pro hac vice, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Francis Liu, pro hac vice, to represent Plaintiffs in the above captioned matter be granted.

Pursuant to 28 U.S.C. 1736, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and information.

Dated: February 18, 2010  
Englewood, New Jersey

Respectfully submitted,

  
\_\_\_\_\_

Michael S. Kimm, Esq.  
SDNY Bar code: MK4476

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**ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of Michael S. Kimm, attorney for Sang Chul Lee and Dukson Lee, and  
said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Francis Liu  
Kimm Law Firm  
41W Bancker Street  
Englewood, NJ 07631  
Telephone: 201-569-2880  
Fax: 201-569-2881  
[FL@kimmlaw.com](mailto:FL@kimmlaw.com)

is admitted to practice *pro hac vice* as counsel for Sang Chul Lee and Dukson Lee in the above  
captioned case in the United States Bankruptcy Court for the Southern District of New York,  
provided that the filing fee has been paid.

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
HON. ROBERT E. GERBER USBJ

# Supreme Court of New Jersey

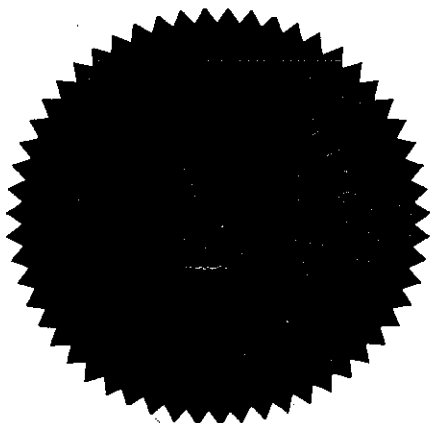


## Certificate of Good Standing

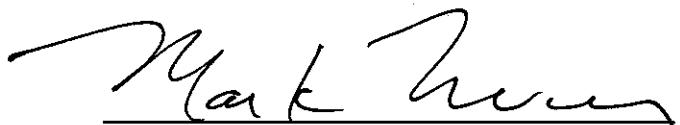
*This is to certify that*                    **FRANCIS LIU**  
(No.            **039582009** ) *was constituted and appointed an Attorney at Law of New*  
*Jersey on*    **December 02, 2009**    *and, as such,*  
*has been admitted to practice before the Supreme Court and all other courts of this State*  
*as an Attorney at Law, according to its laws, rules, and customs.*

*I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.*

*Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.*



*In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this*  
**9TH** *day of*    **February**    , 20    **10**

  
Clerk of the Supreme Court

**Certificate of Service**

Francis Liu, Esq., hereby certifies that the foregoing was served on all parties on record and on the Office of the United States Trustee through ECF.

Dated: February 18, 2010

/s/ Francis Liu  
Francis Liu