

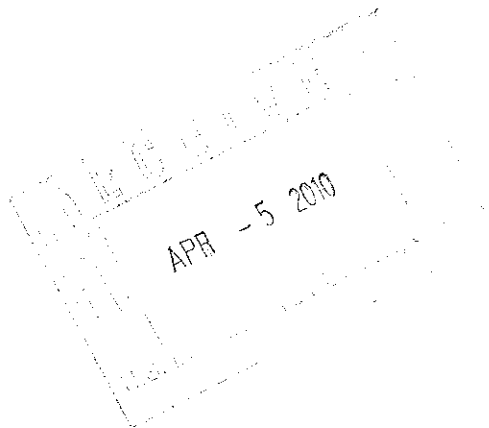
UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:  
Motors Liquidation Co,  
F/K/A General Motors Corp,  
Debtors,

Case # 09-50026

Lisa Gross  
Claimant,



Reply to Response Filed 3/25/2010

To the Honorable Robert Gerber.  
It is true as the respondents to my motions to lift the automatic stay have stated, I was aware of the bankruptcy proceedings in fact I was aware of the possibilities of the proceedings before they commenced because of television, radio and newspaper. I was in the same and more aware after the proceedings started because Michael Williams of Lathrop & Case who was the lead attorney regarding my Appeal case in the 10<sup>th</sup> Circuit filed a notice of Automatic Stay with the 10<sup>th</sup> Circuit Court of Appeals in June of 2009 (Ref Case # 09-3236 10<sup>th</sup> Circuit on Pacer) while I was staying in a shelter for women & children who had experienced recent traumas and ~~forgetting~~ therapy. We left the shelter (it is called Sheffield Place) on 6-17-09 when the environment became unhealthy for me (however it is a good program). On 6-11-09 I returned to City Union Mission

I was only allowed to stay there as a shelter quest<sup>for</sup> 2 weeks because I had previously stayed there from around 2-6-09 through 3-13-09 for a total of about 5 weeks or 6 while being evaluated to go through what was called the new beginners ~~program~~, ~~but~~ because the program required or accepted people who suffered from addictions I did not qualify to remain there. That's when I was accepted at the women and childrens shelter I mentioned on the first page and again remained there until 6-11-09.

Prior to becoming homeless I lived at 619 N Gallatin in Liberty Mo. I was suffering from severe depression that had gone w/o therapy & treatment because of lack of insurance and available therapeutic resources. The depressions and anxieties I suffered from were because of <sup>which are symptoms of bipolar disorder</sup> and foremost the recent loss of my 17 year old son in Nov. of 2006 on the 2<sup>nd</sup> day during which was the day before my 36<sup>th</sup> birthday ~~and that after~~ that I was hospitalized in February of 2007 and treated for ulcers which also followed the defendant's getting summary judgement on my claims except I that kept my case afloat in the district court of Kansas which was my claim for disability discrimination through retaliation. The case was later dismissed because the defendant's claimed I failed to follow a court order and the case was dismissed with prejudice in late July of 2008 it is my understanding that when a case is dismissed with prejudice it can't be retried in the same jurisdiction.

I later filed an appeal with the 10<sup>th</sup> circuit court of appeals in 8/2008 (See Case # 08-3236 in the 10<sup>th</sup> circuit court of appeals) (See docketing statement and Appeal brief filed by Lois Gross)

~~In my appeal brief I claimed I followed the courts order~~

In my appeal I appealed the dismissal of the case ~~it~~ and the dismissal of charges in Summary Judgment <sup>and amended claims</sup> and left it up to the appeals court to determine my relief provided I prevailed and listed my losses as of the time and 21 charitable organizations (or possible organizations) in a statement of losses in the appeal brief. I filed a timely brief according to the rules set forth in the appellate court at the time I lived at 619<sup>th</sup> Gallatin in Liberty Missouri and had been there for some time since 4/1999.

which is the same address I was at when the case commenced in 10/2006. I left 699 W. Galatin in Feb 2009 put most of mine and my 7 year old sons things in storage and went to City Union Mission, as stated earlier in this reply.

After having returned to City Union Mission for the second time in 2009 on June 11 - June 25th (I remember this date for a specific reason other than just to verify) at the end of that allowed time I moved in a one bedroom apartment with a relative on a temporary basis the address was 8624 W Mettux #135 (Apt.) stayed there for or until around 10/22/2009 until it became crowded when one other relative moved in at that time my son (the 7 year old) and I moved to a shelter at 4300 Forest Ave. Reno for about 30 days then returned to 8624 W Mettux and remained there until I moved to my current address 6160 NE 43rd Terrace #204 Reno.

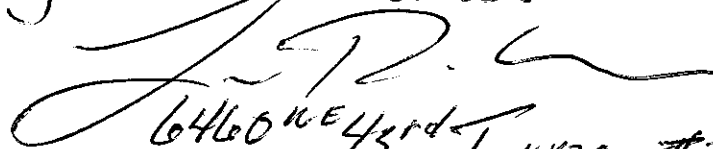
I will not make blind malicious claims and accuse M.C.E. of not trying to contact me because I didn't receive any of their notifications at any address or in any emails. They said they did so at this point I have no choice but to except that unless the court says otherwise but because of extenuating circumstances such as suffering from symptoms of bipolar disorder (Major depression and anxiety as the main symptoms), homelessness from 2/2009 to 1/2010 being a single parent of a seven year old, who too suffers from disabilities but not enough to draw SSI benefits (I've had him evaluated though) I did work from 9/21/09 - 12/16/09 for an employment placement agency but ~~later~~ had to stop due to child care issues but the agency is willing to rehire me yet are reluctant because I unintentionally let them down due to these issues. Ever since I lost my job at C.M. I have only accepted certain working positions that I believed would best accommodate my mental health and my family situation because I am a single parent. However it has been extremely difficult a lot due to the traumas of losing my son, my job, everything I've worked to establish for 15-18 years as a single parent during that time

due to my homelessness and other extenuating circumstances. I was investigated by the division of Social Services because someone reported my son not being in school but at the time I was attempting to home school and had decided to stop because I needed to work and wanted to work to support us. I was very blessed to be able to secure a two bdrm apartment this year not because I was working but because of the grace of God, and mercy and favor. and love the eight or more weeks I worked from 9/2009 - 12/2009 opened the door for me, to get a place for my son and my self, I have not worked since Dec. 2009 not because I don't want to but because I've made the mistake of depending on an unreliable persons to care for my child after the most reliable person fell sick and couldnt care for him any more and another opportunity I had to decline even after going through a security clearance, finger printing, a drug screening and about 3 interviews because of a scheduling conflict I chose to decline the position before the company invested money into my training because I want to be able to give my employers whom ever they may be my very best and because of the scheduling conflict and the responsibilities of my home I wouldn't have been able to do that. I want to work, I take pride in it, working gives me a sense of accomplishment and fulfillment but I am ~~seriously~~ significantly limited in doing so. I wish I wasn't but I am and I cant help that.

The respondents are right I believe to a certain degree to lift this story may cause a flood of others. The rest of the things in it I just dont have the energy to address. In their motion they said they tried to contact me at three different locations because I do have a claim with M.L.C. according to exhibit B of their response and Paragraph 8 of their Preliminary Statement and they tried to contact me all the way up til Nov. 18th 2009 12 days before the deadline to file a claim, but I dont know of any other cases regarding a title 17 claim on the bankruptcy docket I have looked but have not noticed any out of the some 5300+ entries. Not to be sarcastic maybe I just dont or didnt notice them if there are or there are few.

I have to admit that the appeals court has not made a decision regarding my appeal and there is no telling what they will decide but I did leave it in their hands to decide my relief <sup>if I prevail</sup> and plus I have discussed <sup>Settlement</sup> with the defendant's to no prevail before the briefing in the appellate court was closed and I even ~~after~~ addressed it in my appeal brief with no response, I have stated several times I just want what's fair and just and right in the district court, in the appellate court and now the Bankruptcy Court.

I pray the court grants me mercy and favor <sup>and to file claim and pending judgement</sup> and grant my request to lift the Automatic Stay <sup>from 10th Circuit</sup> so that I may proceed with my appeal in the 10th Circuit court if the court finds M.L.O. as the appropriate responsible party and or bless me to know who is. Sincerely & Respectfully: Lisa Patricia Cross.

  
 6460 NE 43rd Terrace #201  
 Kansas City Mo. 64117  
 816-756-4660  
 lisagross5@aol.com

Note The Court can verify all my changes of address on Tracer 10th Circuit of appeals docket case # 083236 and the order of the changes the order of my address changes on the 10th Circuit Docket are almost opposite the order in Paragraph 8 of the respondent's preliminary statement the only one not showing an address was dated Sept 8 because my address was forwarded email to the court and it was 8624 Mattox Apt. C 135 and the court will see documents following that date were forwarded there until I moved here and changed if I have my current address.

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Also I would like to request a telephonic conference if the court finds that a conference would be necessary to resolve the issue concerning lifting the automatic stay and provide me with a transcript of the conference due to the extenuating circumstances I have mentioned in this reply and my financial hardship due to lack of employment even though I have and am seeking gainful and the right employment and seeking diligently. I have sought legal representation in this matter here locally and even over the internet to no prevail (regarding this bankruptcy) on several occasions that is the reason I requested of the court to proceed ~~Proceed~~ and it is my understanding the court doesn't appoint counsel in bankruptcy matters.

I am including also documentation that supports the changes of addresses homeless documents and addresses a copy of my current lease and also I give the court full authorization and release to obtain copies or records of my address changes with the U.S. Postal Service because they no longer give the records or retain the records due to liability reasons. Thank you  
Jared Cross -

Please forward a copy of the foregoing to all interested parties per my request to file w/o notice.  
Filed on 3/2/2010.

All hand written Reply or statements are original copies.

# Verification of Addresses

I am sending these documents

1. to show I received notification of the Stay from Michael Williams of Lathrop & Page

2. Three of the four addresses I've changed within the post office and within the 10<sup>th</sup> Circuit court of appeals. All addresses will definitely match up with the U.S. Postal Service of which I do authorize the court to obtain records of them and the dates of change. These records also show I was residing at the places on record at the time not just using ~~or~~ forwarding mail to them. They also show I did not stay at 619 ~~W~~ <sup>N</sup> Fullerton according to the records as late as 3/16/09 (See homeless verifications from Sheffield Plea) but the actual date was 2/06/2009. The postal service only forwards mail from a given address to another one for up to six months. Homeless shelters do not forward any mail to you after your stay expires, they return

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It to the sender due to the high volume of people who enter in the Shelters and their stay is usually 2 weeks - 1 month unless you remain in one of the extended programs for addictions or domestic abuse you continue to get your mail there and even then when your stay ends ~~for~~ any mail they receive concerning you is still returned to the sender and not forwarded to your new address.

I may have have small gaps in the timing of doing my changes of address because of not knowing at times exactly how long I would be some place and the more I had to change my address the more things may have gotten confused but to confuse things are absolutely not my intention.

#13 is a copy of a change of address form copy I got from 1 post office they could only give me the copy relating to their zip code. This shows where I changed my address from 6604<sup>th</sup> st to 1310 Wabash on 06/12/09 I only got this one because I would've had to go to 4 different cities to get the others and my financial resources are severely limited. But this shows that according to exhibit C on the respondents response (the bar date package on the A.P.S. mail detail that it was first mailed to an address that I did not forward to the Bankruptcy court when I filed my objection on 6/19/09 then mailed to 619<sup>th</sup> Gallatin (hadn't been there over 6 months 10 to be exact and then finally to 1310 Wabash which is a homeless shelter I was no longer at as of 6/25/2009

# LATHROP & GAGE<sub>LLP</sub>

MICHAEL A. WILLIAMS  
DIRECT LINE: (816) 460-5562  
EMAIL: MWILLIAMS@LATHROPGAGE.COM  
WWW.LATHROPGAGE.COM

2345 GRAND BOULEVARD, SUITE 2200  
KANSAS CITY, MISSOURI 64108-2618  
PHONE: (816) 292-2000  
FAX: (816) 292-2001

June 8, 2009

## **BY FEDERAL EXPRESS**

Lisa Patrice Gross  
6604 East 12<sup>th</sup> Street  
Kansas City, Missouri 64126

Re: **Lisa Patrice Gross v. General Motors Corporation**

Dear Ms. Gross:

I write to inform you that on June 1, 2009, (the "Commencement Date"), General Motors Corporation and certain of its subsidiaries (collectively, the "Debtors") filed voluntary petitions seeking bankruptcy protection under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"). The Chapter 11 cases have been consolidated for procedural purposes and bear Case No. 09-50026 (REG). Enclosed herewith is a copy of the Debtors' Chapter 11 Petition.

Your attention is directed to section 362(a) of the Bankruptcy Code, entitled "Automatic Stay." Pursuant to section 362(a) of the Bankruptcy Code, an automatic stay went into effect on the Commencement Date, prohibiting the commencement or continuation of any actions or proceedings against the Debtors. The automatic stay expressly prohibits the following:

the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under [the Bankruptcy Code.]

11 U.S.C. § 362(a)(1).

Accordingly, the above-captioned action is automatically stayed as to GM. All actions taken in violation of the automatic stay are void. Further, pursuant to established case law, parties may be held in contempt of court for violating the automatic stay. See, e.g., Bartel v. Eastern Airlines, 133 F.3d 908 (2d cir. 1998); Fidelity Mortgage Investors v. Camelia Builders, Inc., 550 F.2d 47 (2d cir. 1976), cert. denied, 429 U.S. 1093 (1977).



Family Center
1310 Wabash
Kansas City, MO 64127
Phone: (816) 474-9380 Ext. 410
Fax: (816) 231-7597
E-mail: info@cumission.org
Web page: cumission.org

Date 6/16/09

To Whom It May Concern:

I am writing to confirm that Lisa Bass is/are

staying at City Union Mission Family Shelter 1310 Wabash KC MO 64127 because of no or limited resources. The person/family is homeless and was forced to seek shelter here. We provide shelter and three meals per day. The guest(s) came to the shelter on 6-11-09. They may receive mail at this address. If you have any questions, you may call and ask for one of us.

Thank you,

Dan Dickey Shelter Administrator 816-329-1422
Betty J. Howard Case Manager 816329-1431
Andy Peck Case Manager 816-329-1416
Ashley Wayne Case Manager 816-329-1416
Adam Schilling Case Manager 816-329-1446

Children who are in the shelter with their parent(s) or guardian(s):

- 1. Michael
2.
3.
4.
5.
6.
7.
8.



11.  
Providing a home and a future  
for Kansas City's families since 1991.

March 18, 2009

RE: Homeless verification

To Whom It May Concern:

This letter is to advise that Lisa Gross is currently residing at Sheffield Place, 6604 E. 12<sup>th</sup> Street, Kansas City, MO 64126, a transitional living facility for homeless families, with her child since 3/16/09. Ms. Gross is required to pay a program fee of \$184.80 per month for rent and \$\$65.60 required savings for a total of \$250.40 per month.

Sincerely,

A handwritten signature in cursive script, appearing to read "LaTanya Simmons".

LaTanya Simmons, BSW  
Case Manager  
Sheffield Place



Restricted Information

The 3982 Printer ICON viewable on the login screen is now active for the entire Capital District, 22192 and 22193 (National Activation Date TBD).



COA Form View

Home Logout

Detail

991683173011068

**OFFICIAL MAIL FORWARDING CHANGE OF ADDRESS ORDER**

Please PRINT items 1-10 in blue or black ink. Your signature is required in item 9.

1. Change of Address for: (Read Attached Instructions)  
 Individual (#6)    Entire Family (#6)    Business (#6)    Temporary?    Yes    No

2. Is This Move Temporary?    Yes    No

3. Start Date: 06/20/09. If TEMPORARY move, print date to discontinue forwarding: (ex. 03/27/09)

5a. LAST Name & J2/St. etc. **GROSS**

5b. FIRST Name and MI **LISA P**

6. If BUSINESS Move, Print Business Name

PRINT OLD MAILING ADDRESS BELOW: HOUSE/BUILDING NUMBER AND STREET NAME (INCLUDE ST., AVE., CT., ETC.) OR PO BOX

7a. OLD Mailing Address **6604 E 12th Street.**

7b. For Puerto Rico Only: If address is in PR, print urbanization name, if appropriate.

7c. OLD CITY **KANSAS**

7d. State **MO**

7e. ZIP **64126**

PRINT NEW MAILING ADDRESS BELOW: HOUSE/BUILDING NUMBER AND STREET NAME (INCLUDE ST., AVE., CT., ETC.) OR PO BOX

8a. NEW Mailing Address **1310 WABASH**

8b. For Puerto Rico Only: If address is in PR, print urbanization name, if appropriate.

8c. NEW CITY **KANSAS**

8d. State **MO**

8e. ZIP **64127**

9. Print and Sign Name (see conditions on reverse)

Print: **LISA P GROSS**

10. Date Signed: 06/20/09

PS FORM 3675 MAY 2009    Visit [usps.com](http://usps.com) to change your address online or call 1-800-ASK-USPS (1-800-275-8777) 0509

**OFFICIAL USE ONLY**

Zone/Route ID No.

Date Entered on Form 3982  
M M D D Y Y

Expiration Date  
M M D D Y Y

Clerk/Carrier Endorsement