

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

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

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: **Chapter 11 Case No.**
: **09-50026 (REG)**
: **(Jointly Administered)**
: **Debtors.**
: **(Jointly Administered)**
: **(Jointly Administered)**
: **(Jointly Administered)**
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MOTORS LIQUIDATION COMPANY ET AL.'S (f/k/a GENERAL MOTORS CORPORATION ET AL.) STATEMENT OF ISSUE PRESENTED ON APPEAL AND COUNTERDESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL IN CONNECTION WITH THE APPEAL OF STANLEY R. STASKO

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors (collectively, the “**Debtors**”), submit the following statement of issue presented on appeal and counterdesignation of additional items to be included in the record in connection with the appeal of Stanley R. Stasko (“**Stasko**”) from the order of the United States Bankruptcy Court for the Southern District of New York (the

“**Bankruptcy Court**”) (Robert E. Gerber, J.) denying Stasko’s motion for relief from the automatic stay, entered on April 21, 2010 (the “**Order**”) [Docket No. 5532].¹

STATEMENT OF ISSUE ON APPEAL

1. Has Appellant met his burden of establishing that the Bankruptcy Court abused its discretion in granting the Order denying Appellant’s motion for relief from the automatic stay?

COUNTERDESIGNATION OF RECORD

Designation Number	Date of Filing	Docket Number	Description
1	6/01/2009	21	Affidavit of Frederick A. Henderson Pursuant to Local Bankruptcy Rule 1007-2
2	6/27/2009	2649	Amended and Restated Master Sale & Purchase Agreement and Certain Exhibits and Schedules Thereto
3	9/16/2009	4079	Order Establishing the Deadline for Filing Proofs of Claim
4	02/19/2010	5151	Motion for Relief from Stay filed by Stanley R. Stasko
5	04/01/2010	5390	Debtors’ Opposition to the Motion of Stanley Stasko Pursuant to 11 U.S.C. § 362(d) Modifying the Automatic Stay Imposed by 11 U.S.C. 362(a) After Material

¹ This Counterdesignation designates certain items that have been designated in Appellant’s Designation of Items to be Included in the Record on Appeal (“**Stasko’s Designation**”), to avoid any confusion regarding which items are included in the record on appeal because Stasko’s Designation failed to provide a date with respect to such items. The Debtors reserve the right to amend this Counterdesignation of Additional Items to be Included in the Record on Appeal. For items designated, the designation includes all documents referenced within the particular document number, including, without limitation, all exhibits, attachments, declarations, and affidavits related thereto.

			Default
6	04/05/2010	5442	Response of Stanley R. Stasko to Debtor's Opposition to Motion Modifying the Automatic Stay
7	04/09/2010	5509	Transcript Regarding Hearing Held on 04/08/2010
8	04/21/2010	5532	Order Denying Motion of Stanley R. Stasko for Relief from the Automatic Stay
9	05/03/2010	5736	Notice of Appeal filed by Stanley R. Stasko
10	6/1/2009 – 05/21/2010	N/A	Docket for <i>Motors Liquidation Company, et al. (f/k/a General Motors Corp. et al.)</i> , Ch. 11 Case No. 09-50026 (REG) for 6/1/2009 through 05/21/2010

Dated: May 21, 2010
New York, New York

/s/ Joseph H. Smolinsky
Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

*Attorneys for Debtors and
Debtors in Possession*