

HEARING DATE AND TIME: May 27, 2010 at 9:45 a.m. (Eastern Time)
OBJECTION DEADLINE: May 20, 2010 at 4:00 p.m. (Eastern Time)

Elihu Inselbuch
Rita C. Tobin
CAPLIN & DRYSDALE, CHARTERED
375 Park Avenue, 35th Floor
New York, New York 10152-3500
Telephone: (212) 319-7125
Facsimile: (212) 644-6755

Trevor W. Swett III
Kevin C. Maclay
CAPLIN & DRYSDALE, CHARTERED
One Thomas Circle, N.W.
Suite 1100
Washington, D.C. 20005-5802
Telephone: (202) 862-5000
Facsimile: (202) 429-3301

*Counsel for the Official Committee
of Unsecured Creditors Holding Asbestos-Related Claims*

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

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In re :
MOTORS LIQUIDATION COMPANY, *et al.*, : Chapter 11 Case No.
f/k/a General Motors Corp., *et al.* :
: 09-50026 (REG)
: (Jointly Administered)
: :
: :
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**SUPPLEMENTAL AND CORRECTED RESPONSE OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS HOLDING ASBESTOS-RELATED CLAIMS TO
THIRD MOTION OF DEBTORS' FOR ENTRY OF ORDER PURSUANT TO 11 U.S.C.
§ 1121(d) EXTENDING PERIODS IN WHICH DEBTORS MAY FILE CHAPTER 11
PLAN AND SOLICIT ACCEPTANCES THEREOF**

The Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the “**Asbestos Claimants Committee**” or “**ACC**”), by its undersigned counsel, submits this supplemental and corrected response to the Debtors’ motion for a third extension of the periods during which the Debtors enjoy the exclusive right to propose a plan of liquidation and solicit acceptances from creditors (the “**Motion**”) and respectfully states as follows:

1. On May 20, 2010, the ACC filed its response to the Motion [D.I. No. 5815]. The ACC therein stated that it does not oppose the Motion, but that the “the formulation and confirmation of a liquidation plan depend upon, among other things, the conclusion of an asbestos claims estimation process that is only now beginning. That process can progress expeditiously only after the Debtors complete the production of relevant data.” Response ¶ 2.

2. The ACC also stated in its Response that although its claims consultant had received access to the Debtors’ database of prepetition claims, the ACC had “not yet received the data compiled by the Debtors with respect to asbestos claims filed during these cases pursuant to the bar date order.” Response ¶ 4. We have since learned that the latter statement was incorrect in this respect: The Debtors’ data regarding asbestos claims filed during these cases was provided to the ACC’s consultant on May 15, 2010.

3. It remains the ACC’s position that the Motion should be granted, reserving the rights of all parties with respect to any subsequent motion to extend or terminate exclusivity.

Dated: May 24, 2010

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED

By: /s/ Trevor W. Swett III
Elihu Inselbuch
Rita C. Tobin
375 Park Avenue, 35th Floor
New York, NY 10152-3500
Telephone: (212) 319-7125
Facsimile: (212) 644-6755
E-mail: eicapdale@com; rct@capdale.com

Trevor W. Swett III
Kevin C. Maclay
CAPLIN & DRYSDALE, CHARTERED
One Thomas Circle, NW
Suite 1100
Washington, DC 20005
Telephone: (202) 862-5000
Facsimile: (202) 429-3301
E-mail: tws@capdale.com;
kcm@capdale.com

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