# PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM(S)

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Attorneys for Debtors and Debtors in Possession

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

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

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Debtors. : (Jointly Administered)

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### NOTICE OF DEBTORS' THIRTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS (Claims with Insufficient Documentation)

PLEASE TAKE NOTICE that on July 2, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "Debtors"), filed their thirty-seventh omnibus objection to expunge certain claims (the "Thirty-Seventh Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Thirty-Seventh Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on

August 6, 2010 at 9:45 a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE THIRTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT "A" ANNEXED THERETO.

PLEASE TAKE FURTHER NOTICE that any responses to the Thirty-Seventh Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP,

attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than July 30, 2010 at 4:00 p.m. (Eastern Time) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and

served with respect to the Thirty-Seventh Omnibus Objection to Claims or any claim set forth

thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an

order substantially in the form of the proposed order annexed to the Thirty-Seventh Omnibus

Objection to Claims, which order may be entered with no further notice or opportunity to be

heard offered to any party.

Dated: New York, New York

July 2, 2010

/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

### HEARING DATE AND TIME: August 6, 2010 at 9:45 a.m. (Eastern Time) RESPONSE DEADLINE: July 30, 2010 at 4:00 p.m. (Eastern Time)

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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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

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Debtors. : (Jointly Administered)

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### DEBTORS' THIRTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS

(Claims with Insufficient Documentation)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE EXHIBIT ANNEXED TO THIS OBJECTION.

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

Motors Liquidation Company (f/k/a General Motors Corporation) ("**MLC**") and its affiliated debtors, as debtors in possession (collectively, the "**Debtors**"), respectfully represent:

#### **Relief Requested**

- 1. The Debtors file this thirty-seventh omnibus objection to certain claims (the "Thirty-Seventh Omnibus Objection to Claims"), pursuant to section 502(b) of title 11, United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 4180], and this Court's order approving the procedures relating to the filing of proofs of claim (the "Bar Date Order") [Docket No. 4079], seeking entry of an order disallowing and expunging the claims listed on Exhibit "A" annexed hereto. 1
- 2. The Debtors have examined the proofs of claim identified on Exhibit "A" and have made every effort to ascertain the validity of such claims. In fact, prior to the filing of this Thirty-Seventh Omnibus Objection to Claims, the Debtors sent a letter to each of the claimants listed on Exhibit "A" requesting information that would permit the Debtors to understand the basis and nature of the their respective proofs of claim. To date, the Debtors have not received any response.
- 3. After careful review, the Debtors have determined that the proofs of claim listed under the heading "Claims to be Disallowed and Expunged" (collectively, the "Claims with Insufficient Documentation") fail to provide sufficient documentation to ascertain the validity of such claims. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule

Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors' bankruptcy estates on the Debtors' claims register on the website maintained by the Debtors' claims agent, <a href="https://www.motorsliquidation.com">www.motorsliquidation.com</a>. A link to the claims register is located under the "Claims Information" tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

3007, and the Bar Date Order, the Debtors seek entry of an order disallowing and expunging from the claims register the Claims with Insufficient Documentation. Further, the Debtors reserve all of their rights to object on any other basis to any Claims with Insufficient Documentation as to which the Court does not grant the relief requested herein.

#### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

#### **Background**

- 5. On June 1, 2009, four of the Debtors (the "Initial Debtors")<sup>2</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the "Realm/Encore Debtors")<sup>3</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.
- 6. On September 16, 2009, this Court entered an order [Docket No. 4079] establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors' cases, including governmental units. On December 2, 2009, this Court entered an order [Docket No. 4586] establishing February 1, 2010 as the deadline for each

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The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

person or entity to file a proof of claim in the Realm/Encore Debtors' cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim).

7. Furthermore, on October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

#### The Relief Requested Should Be Approved by the Court

- 8. A proof of claim *must* "set forth the facts necessary to support the claim" for it to receive the prima facie validity accorded under the Bankruptcy Rules. *In re Chain*, 255 B.R. 278, 280 (Bankr. D. Conn. 2000) (internal quotation omitted); *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988); *see Ashford v. Consol. Pioneer Mortgage*, 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995), aff'd, 91 F.3d 151 (9th Cir. 1996); *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1).
- 9. The Claims with Insufficient Documentation fall far short of the standard unambiguously required in the Bar Date Order. Indeed, the Bar Date Order, requires, among other things, that a proof of claim must "set forth with specificity the legal and factual basis for the alleged [c]laim [and] include supporting documentation or an explanation as to why such documentation is not available. (Bar Date Order at 2.)<sup>4</sup>

Notices of the Bar Date Order contained express references to this requirement.

10. The Debtors have examined the proofs of claim identified on Exhibit "A"

and have determined that the proofs of claim listed under the heading "Claims to be Disallowed

and Expunged" do not include sufficient documentation to ascertain the nature or validity of

these claims. Thus, the Debtors request that the Court disallow and expunge in their entirety the

Claims with Insufficient Documentation.

**Notice** 

11. Notice of this Thirty-Seventh Omnibus Objection to Claims has been

provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the

Third Amended 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 April 29, 2010 [Docket No. 5670].

12. No previous request for the relief sought herein has been made by the

Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the

relief requested herein and such other and further relief as is just.

Dated: New York, New York

July 2, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller

Stephen Karotkin

Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

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**Attorneys for Debtors** 

and Debtors in Possession

09-50026 (REG)

SOUTHERN DISTRICT OF NEW		
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In re	:	Chapter 11 Case No.
	:	

MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al.

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Debtors. : (Jointly Administered)

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## ORDER GRANTING DEBTORS' THIRTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS (Claims with Insufficient Documentation)

Upon the thirty-seventh omnibus objection to expunge certain claims, dated July 2, 2010 (the "Thirty-Seventh Omnibus Objection to Claims"), of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11, United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 4180], seeking entry of an order disallowing and expunging the Claims with Insufficient Documentation on the grounds that such claims fail to provide sufficient documentation to ascertain the validity of the claim, all as more fully described in the Thirty-Seventh Omnibus Objection to Claims; and due and proper notice of the Thirty-Seventh Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Thirty-Seventh Omnibus

Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Thirty-Seventh Omnibus Objection to Claims.

Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Thirty-Seventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Thirty-Seventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit "A"** annexed hereto under the heading "*Claims to be Disallowed and Expunged*" are disallowed and expunged from the claims registry; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Thirty-Seventh Omnibus Objection to Claims under the heading "Claims to be Disallowed and Expunged" that is not disallowed or expunged pursuant to this Order; and it is further

ORDERED that to the extent a disallowed and expunged claim is a workers' compensation claim with respect to an employee residing or employed in any state other than the states of Alabama, Georgia, New Jersey, and Oklahoma, the disallowance of such claim shall not affect the claimant's rights to continue receiving benefits from General Motors, LLC (f/k/a NGMCO, Inc.), the purchaser of substantially all the assets of General Motors Corporation; and it is further

ORDERED that to the extent a disallowed and expunged claim is for principal under a public debt security issued by the Debtors, the disallowance of such claim shall not affect the right of the claimant to participate in recoveries as a holder of securities under any

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proof of claim filed by an indenture trustee in respect of the subject issuance; and it is further ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York \_\_\_\_\_\_, 2010

United States Bankruptcy Judge

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ALLEN OR BONITA DELLINGER C/O ALLEN DELLINGER 7440 TWIN OAKS DRIVE KNIGHTSTOWN, IN 46148	36995	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
	(200		Unliquidated	Insufficient	Pgs. 1-4
ANGHILANTE, JAMES J 1736 N DECATUR BLVD APT 1	65268	Motors Liquidation Company		Documentation	Pgs. 1-4
LAS VEGAS, NV 89108		Company			
			Unliquidated		
ANNE M FAGAN 5332 S 46TH ST	33037	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
GREENFIELD, WI 33220		Company			
			Unliquidated		
ANTONIO V D'ADDEO AND 'HERESA F D'ADDEO JTWROS 9 WICKHAM RD GLASTONBURY, CT 06033	45572	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
ARZT KATHLEEN 7991 GRANITE WALK AVE	32680	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
AS VEGAS, NV 89178		Company	\$0.00 (A)		
			\$0.00 (P)		
			\$10,000.00 (U) \$10,000.00 (T)		
ARZT, KATHLEEN 7991 GRANITE WALK AVE	32679	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
AS VEGAS, NV 89170		Company	\$0.00 (A) \$0.00 (P)		
			\$15,000.00 (U)		
			\$15,000.00 (T)		

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Claim Amount Priority (1)		Grounds For Objection	Objection Page Reference
BALL, JAMES R 150 LYNWOOD LN	30679	Motors Liquidation Company			Insufficient Documentation	Pgs. 1-4
EESBURG, GA 31763		Company				
			Unliquidate	d		
DANOUE DE COMMEDCE ET DE DI ACEMENT CA	59973	Motors	\$0.00		Insufficient	Pgs. 1-4
BANQUE DE COMMERCE ET DE PLACEMENT SA I RUE DE LA FONTAINE PO BOX 3069	39913	Liquidation Company	\$0.00		Documentation	18011
GENEVA SWITZERLAND			\$0.00	(P)		
SWITZERLAND			\$50,000.00	(U)		
			\$50,000.00	(T)		
BENT WOLFF	44769	Motors	\$0.00	(S)	Insufficient Documentation	Pgs. 1-4
BROND 11 HOLMSKOV		Liquidation Company	\$0.00	(A)	Documentation	
5430 NORDBORG DENMARK			\$0.00	(P)		
DENMARK			\$33,993.00	(U)		
			\$33,993.00	(T)		
BILLY ENGLAND HUSBAND AND SURVIVING SPOUSE OF FANNIE	64820	Motors	\$0.00	(S)	Insufficient	Pgs. 1-4
LENGLAND C/O DAVE SCOTT		Liquidation Company	\$0.00	(A)	Documentation	
PO BOX 99			\$0.00	(P)		
NEW ALBANY, IN 47151			\$250,000.00	(U)		
			\$250,000.00	(T)		
BILLY WOODWARD	64817	Motors Liquidation	\$0.00	(S)	Insufficient Documentation	Pgs. 1-4
C/O TIM R WADSWORTH, ATTORNEY AT LAW PO BOX 987		Company	\$0.00	(A)	Documentation	
SULLIGENT, AL 35586 JNITED STATES OF AMERICA			\$0.00	(P)		
STATES OF THE ST			\$600,000.00	(U)		
			\$600,000.00	(T)		

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BLOOMFIELD COMMERCE CENTER CORPORATION 17755 SKY PARK CIR STE 100	62747	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
RVINE, CA 92614		Company			
			Unliquidated		
BRIAN D BRODIE 529 N WALNUT ST	63509	Motors Liquidation	oquidade	Insufficient Documentation	Pgs. 1-4
JANESVILLE, WI 53548		Company			
			Heliopidas d		
BRIMIDGE, JAMES R PO BOX 722 112 SCHOOLHOUSE LN CHARENTON, LA 70523	38952	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-4
			Unliquidated		
CAMERON CHAPMAN ATTN RONNIE L CROSBY ESQ PETERS MUURDAUGH PARKER ELTZROTH & DETRICK PA	60032	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)	Insufficient Documentation	Pgs. 1-4
PO BOX 457 HAMPTON, SC 29924			\$0.00 (P)		
			\$1,000,000.00 (U) \$1,000,000.00 (T)		
			ψ1,000,000.00 (1)		
CHARLES BECKER JM GRUNED 10 D-64253 HEILEG GERMANY	62062	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
GERMANY					
			Unliquidated		

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

	CLAIMS TO BE DIS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
CHARLIE C CLARK JR	63121	Motors		Insufficient	Pgs. 1-4
3711 STATE ROUTE 380		Liquidation Company		Documentation	
WILMINGTON, OH 45177					
			Unliquidated		
CIKAUTXO S COOP LTDA	39413	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
BUDOVATELSKA 6 NOVE ZAMKY SK 940 01 SLOVAKIA		Liquidation Company	\$0.00 (A)	Documentation	
			\$0.00 (P)		
SLOVAKIA			\$3,825.55 (U)		
			\$3,825.55 (T)		
CLARK STREET DEVELOPMENT SEVEN LLC KATHLEEN H KLAUS ESQ	58635	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034					
			Unliquidated		
CLARK STREET REDEVELOPMENT FIVE LLC KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FLOOR SOUTHFIELD, MI 48034	58641	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
CLARK STREET REDEVELOPMENT LLC	58637	Motors	- -	Insufficient	Pgs. 1-4
ATTN: KATHLEEN KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL		Liquidation Company		Documentation	
SOUTHFIELD, MI 48034					
			Unliquidated		

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Claim Amount and	Grounds For	Objection Page
			Priority (1)	Objection	Reference
CLARK STREET REDEVELOPMENT ONE LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58638	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
CLARK STREET REDEVELOPMENT SIX LLC KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER P C 28400 NORTHWESTERN HIGH WAY 3RD FLOOR SOUTHFIELD, MI 48034	58642	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
CLARK STREET REDEVELOPMENT THREE LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58640	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
CLARK STREET REDEVELOPMENT TWO LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58639	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
CLARK STREET REDEVELPOMENT FOUR LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58647	Motors Liquidation Company	Cquidace	Insufficient Documentation	Pgs. 1-4
			Unliquidated		

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<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference		
CLARK STREET TECHNOLOGY PARK KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER, P C 8400 NORTHWESTERN HIGHWAY 3RD FLOOR OUTHFIELD, MI 48034	58643	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4		
COOPER SIMMIE	33511	Motors Liquidation	Unliquidated	Insufficient Documentation	Pgs. 1-4		
PO BOX 700843 DALLAS, TX 75370		Company		Documentation			
			Unliquidated				
CUMMINGS, EDWARD 4517 ROGERS RD B CHATTANOOGA, TN 37411	61770	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4		
			Unliquidated				
DAVID J O'CONNOR (IRA) FCC AS CUSTODIAN 4253 LAKE CHAPIN BLUFF BERRIEN SPRGS, MI 49103	61947	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4		
			Unliquidated				
DEVOL, DEBRA L 596 E GRAHAM PL BLOOMINGTON, IN 47401	65308	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4		
			Unliquidated				

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<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

	CLAIMS TO BE DIS	SALLOWED AND	EXPUNGED		
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DIXON, JANICE L 912 EDINBURGH ST APT 104	65036	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
CANTON, MI 48187		Company			
			Unliquidated		
DONNA PASCOE	65252	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
076 SUFFIELD AVE		Company			
BIRMINGHAM, MI 48009					
			Unliquidated		
ELIZABETH BRUZZONE 3400 WAGNER HEIGHTS RD #303	50157	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
STOCKTON, CA 95209		Company			
			Unliquidated		
EXECUTIVE CHARGE INC	29576	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
1440 39TH ST		Company	\$0.00 (A)		
BROOKLYN, NY 11218			\$0.00 (P)		
			\$1,383.38 (U)		
			\$1,383.38 (T)		
FRANCES MARTZ 1344 BLUEVISTA DR	44643	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
SUN CITY, FL 33573		Company			
			Unliquidated		
FRANKOVICH, GAYLORD P 700 SPOKANE AVE	36964	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
LANSING, MI 48910		Company			
			Unliquidated		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FROHNHOFER JR, JOSEPH 18625 MARSHA ST	30673	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
		Company	\$0.00 (A)		
RIVERVIEW, MI 48193			\$0.00 (P)		
			\$10,000.00 (U)		
			\$10,000.00 (T)		
GARCIA, GEORGE P	61430	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
1817 N CLINTON ST		Company	\$0.00 (A)	Documentation	
SAGINAW, MI 48602			\$0.00 (P)		
			\$25,000.00 (U)		
			\$25,000.00 (T)		
GAYLORD FRANKOVICH 700 SPOKANE AVE	36965	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
LANSING, MI 48910					
			Unliquidated		
GENE E NEZAT 908 GARDEN ST	64915	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
MORGAN CITY, LA 70380		Company			
			Unliquidated		
GEORGE RICCIARDI	62484	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
221 CIRCUIT AVENUE		Company	\$0.00 (A)		
WATERBURY, CT 06708			\$0.00 (P)		
			\$12,475.00 (U)		
			\$12,475.00 (T)		
HAYMAN MANAGEMENT CO ATTN: KATHLEEN H KLAUS, ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 8400 NORTHWESTERN HIGHWAY 3RD FL OUTHFIELD, MI 48034	58636	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HEMPHILL, MARVIN 119 22ND AVE NE	36972	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
FUSCALOOSA, AL 35404					
			Unliquidated		
IRA FBO BARRY MICHITSCH	45068	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
PERSHING LLC AS CUSTODIAN ROTH ACCOUNT		Liquidation Company	\$0.00 (A)	Documentation	
294 ANNA AVE WATERBURY, CT 06708			\$2,500.00 (P)		
			\$0.00 (U)		
			\$2,500.00 (T)		
			Unliquidated		
JACK THOMAS GAILEY AS GAL FOR CHASE GAILEY A MINOR	60031	Motors Liquidation Company	\$0.00 (S)	Insufficient	Pgs. 1-4
ATTN RONNIE L CROSBY ESQ PETERS MURDAUGH PARKER ELTZROTH & DETRICK PA PO BOX 457			\$0.00 (A)	Documentation	
HAMPTON, SC 29924			\$0.00 (P)		
			\$1,000,000.00 (U)		
			\$1,000,000.00 (T)		
JAMES CLARK 600 HOLLY	63119	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
ANGLETON, TX 77515		Company			
			Unliquidated		
IAMES SHARPLEY 1211 23RD AVENUE	61525	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
DECATUR, AL 35601		Company			
			Unliquidated		

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Name and Address of Claimant	Claim#	Debtor	Claim Amount and	Grounds For	Objection Page
			Priority (1)	Objection	Reference
OSEPH M LEWANDOWSKI	51118	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
9092 CREEK RD		Liquidation Company	\$0.00 (A)	Documentation	
ATAVIA, NY 14020			\$0.00 (P)		
			\$3,648.65 (U)		
			\$3,648.65 (T)		
KENNETH CENTERS	49664	Motors		Insufficient	Pgs. 1-4
33 MAXA CT.		Liquidation Company		Documentation	
BALTIMORE, MD 21220 UNITED STATES OF AMERICA					
			Unliquidated		
LANGLEY JOHNNY P 2004 SOUTHRIDGE DRIVE	64731	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
ARLINGTON, TX 76010					
			Unliquidated		
MARIA LEBROWSKA VALERO	32973	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
JL WALICOW 20 M 1304		Liquidation Company	\$0.00 (A)	Documentation	-
00851 WARSAW POLAND		13	\$0.00 (P)		
POLAND (REP)			\$23,285.57 (U)		
			\$23,285.57 (T)		
			, ,		
MARKUS EITEL	32863	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
XAMMHALDENWEG 34 70619 STUTTGART GERMANY		Liquidation Company	\$0.00 (A)	Documentation	
GERMANY			\$0.00 (P)		
GERMANY			\$2,250.00 (U)		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and	Grounds For	Objection Page
			Priority (1)	Objection	Reference
MICHIGAN AUTOMOTIVE OF INDIANA INC JONES WALLACE LLC ATTN PAUL J WALLACE 420 MAIN ST SUITE 1600 EVANSVILLE, IN 47708	37196	MLCS Distribution Corporation		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
MITCHELL, CAROLYN J 8714 LOG RUN N DR	61702	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
INDIANAPOLIS, IN 46234		Company			
			Unliquidated		
NELSON, OVERTON 4530 HORATIO ST	50186	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
DETROIT, MI 48210		Company			
			Unliquidated		
NICHOLS, JOYCE 610 EASTER RD APT 1007	29582	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
BETHEL, OH 45106		Company			
			Unliquidated		
ODIE BRYER C/O THE MADEKSHO LAW FIRM 8866 GULF FREEWAY SUITE 440 HOUSTON, TX 77017	46747	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		

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	CLAIMS TO BE DIS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Pag Reference
ALERMO ANTHONY	59088	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
233 HIGHWAY 27 DEQUINCY, LA 70633		Company	\$0.00 (A)	Documentation	
			\$0.00 (P)		
			\$2,100,000.00 (U)		
			\$2,100,000.00 (T)		
ASCOE DONNA L	65253	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
76 SUFFIELD AVE		Company			
IRMINGHAM, MI 48009					
			Unliquidated		
PAUL T DEDRICK & VIVIAN R DEDRICK	44780	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
16 AUBURN ROAD		Liquidation Company	\$0.00 (A)	Documentation	
GROTON, NY 13073		1,	\$0.00 (P)		
			\$3,065.90 (U)		
			\$3,065.90 (T)		
PAULSON, KERRY A	50132	Motors		Insufficient Documentation	Pgs. 1-4
1520 COLONIAL WOODS DR		Liquidation Company		Documentation	
CLIO, MI 48420					
			Unliquidated		
PETER W LYDING & DOROTHY LYDING JT TEN 3660 OXFORD AVE APT 9-C BRONX, NY 10463	33423	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
PETERSON, REBECCA	32992	Motors		Insufficient	Pgs. 1-4
777 S HARRISON ST APT 9N		Liquidation Company		Documentation	
AST ORANGE, NJ 07018					
			Unliquidated		

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<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

C	LAIMS TO BE DIS	SALLOWED AND	EXPUNGED		
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
RANDHILL INC	32994	Motors	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
C/O INGO ALBAT APARTADO DE CORREOS 427		Liquidation Company	\$0.00 (A)		
E-17320 TOSSA DE MAR SPAIN SPAIN			\$0.00 (P)		
			\$21,000.00 (U)		
			\$21,000.00 (T)		
RAYMOND & JUDITH STACHERSKI TRUSTEES U/A/D 10/27/1997 RAYMOND & JUDITH STACHERSKI TRUST 2535 BAY VISTA DRIVE HIGHLAND, MI 48357	36994	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
REAL VENTURES-CLARK STREET FIVE LLC	58648	Motors Liquidation	Unliquidated	Insufficient Documentation	Pgs. 1-4
ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 8400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034		Company			
			Unliquidated		
REAL VENTURES-CLARK STREET LLC KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER, P C 28400 NORTHWESTERN HIGHWAY 3RD FLOOR SOUTHFIELD, MI 48034	58644	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
REAL VENTURES-CLARK STREET SIX LLC ATTN: KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER PC 28400 NORTHWESTERN HIGHWAY 3RD FL SOUTHFIELD, MI 48034	58646	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and	<b>Grounds For</b>	Objection Page
			Priority (1)	Objection	Reference
REAL VENTURES-CLARK STREET TWO, LLC KATHLEEN H KLAUS ESQ MADDIN HAUSER WARTELL ROTH & HELLER, P C 28400 NORTHWESTERN HIGHWAY 3RD FLOOR SOUTHFIELD, MI 48034	58645	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
REINHOLD ZETTELMEIER BERN RIEDER STR 40 S4 560 OFFENBERG GERMANY	65320	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
GERMANY					
			Unliquidated		
REYNOLDS CODY REYNOLDS, CODY	38304	Motors Liquidation	\$0.00 (S) \$0.00 (A)	Insufficient Documentation	Pgs. 1-4
17225 EL CAMINO REAL STE 315 HOUSTON, TX 77058		Company	\$0.00 (P)		
			\$15,317.86 (U)		
			\$15,317.86 (T)		
RICHARD W MADURA D D S JOAN MADURA JT TEN 75 WILDWOOD RD MANITOWISH WATERS, WI 54545	31450	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
ROBERT CARTER 235 W GILES ST	45581	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
SULLIVAN, IN 47882		Company			
			Unliquidated		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount a		Objection Page Reference
CONTROL CARTER IN	44612	Matana	Priority (1) \$10,000.00 (S	Objection  S) Insufficient	
ROBERT L CARTER JR LEOMA J CARTER	44612	Motors Liquidation Company	\$0.00 (A	Documentation	U
1724 RIDGEVIEW DRIVE ARLINGTON, TX 76012		Company	\$10,000.00 (P		
NITED STATES OF AMERICA			\$0.00 (U		
			\$20,000.00 (T		
RON FORZIATI 245 RIVERSIDE AVE	65269	Motors Liquidation Company		Insufficient Documentation	
MEDFORD, MA 02155		Company			
			Unliquidated		
ROY M ARTLEY	44112	Motors Liquidation	\$0.00 (S	S) Insufficient Documentation	U
396 WOODCREST RIDGE ELARKSTON, MI 48346		Company	\$0.00 (A	Δ)	
			\$0.00 (P	P)	
			\$150,000.00 (U	J)	
			\$150,000.00 (T	7)	
			Unliquidated		
SANDRA MARTINEZ KARINA HERNANDEZ CHRISTIAN HERNANDES & JACOB VIGIL	64107	Motors Liquidation	\$0.00 (S	S) Insufficient Documentation	
ATTN JACOB VIGIL VIGIL LAW FIRM PA		Company	\$0.00 (A	A)	
2014 CENTRAL AVE SW			\$0.00 (P	P)	
ALBUQUERQUE, NM 87104			\$10,000,000.00 (U	J)	
			\$10,000,000.00 (T	")	
SANDRA MARTINEZ, KATRINA HERNANDEZ, JACOB VIGIL	64106	Motors Liquidation	\$0.00 (S	S) Insufficient Documentatio	
HERNANDEZ C/O VIGIL LAW FIRM PA		Company	\$0.00 (A		,
2014 CENTRAL AVE SW ALBUQUERQUE, NM 87104			\$0.00 (P	?)	
			\$10,000,000.00 (U	J)	
			\$10,000,000.00 (T	7)	
SELLECK, DELBERT D	61446	Motors	\$0.00 (S	S) Insufficient Documentatio	
720 W 4TH ST		Liquidation Company	\$0.00 (A		<i>,</i> 11
PINCONNING, MI 48650			\$0.00 (P	9)	
			\$250,000.00 (U	T)	
			\$250,000.00 (T	T)	

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and	<b>Grounds For</b>	Objection Page
			Priority (1)	Objection	Reference
SHANA TUBBS, IND. & P.R. OF ESTATE OF BRETT ROSS,	43852	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
DECEASED DANIEL O ROSE, ESQ.		Company	\$0.00 (A)	Documentation	
KREINDLER & KREINDLER LLC 100 PARK AVENUE 18TH FLOOR			\$0.00 (P)		
NEW YORK, NY 10017			\$10,000.00 (U)		
UNITED STATES OF AMERICA			\$10,000.00 (T)		
SHANE GAILEY RONNIE L CROSBY, ESQUIRE	60038	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK PA		Company	\$0.00 (A)		
PO BOX 457 HAMPTON, SC 29924			\$0.00 (P)		
			\$1,000,000.00 (U)		
			\$1,000,000.00 (T)		
SHARPLEY, JAMES H	61752	Motors Liquidation		Insufficient Documentation	Pgs. 1-4
1211 23RD AVENUE DECATUR, AL 35601		Company			
			Unliquidated		
SHELDON SEVINOR TTEE SJS TRUST U/A DTD 09/26/1995 496 LYNNFIELD STREET LYNN, MA 01904	62581	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
			Unliquidated		
STATE FARM MUTUAL AUTOMIBILE INSURANCE COMPANY	50965	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4
ZEEHANDLER, SABATINO & ASSOCIATES, LLC 471 EAST BROAD STREET SUITE 1200		Liquidation Company	\$0.00 (A)	Documentation	
COLUMBUS, OH 43215			\$0.00 (P)		
UNITED STATES OF AMERICA			\$15,140.32 (U)		

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
STATE FARM MUTUAL AUTOMOBILE INS CO PILLEMER & PILLEMER	38858	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4	
14724 VENTURA BLVD #401	Company	\$0.00 (A)				
SHERMAN OAKS, CA 91423			\$0.00 (P)			
			\$26,009.26 (U)			
			\$26,009.26 (T)			
STATE FARM MUTUAL AUTOMOBILE INS. CO.	38831	Motors	\$0.00 (S)	Insufficient	Pgs. 1-4	
C/O PILLEMER & PILLEMER 14724 VENTURA BLVD #401		Liquidation Company	\$0.00 (A)	Documentation		
SHERMAN OAKS, CA 91403 UNITED STATES OF AMERICA			\$0.00 (P)			
			\$51,463.61 (U)			
			\$51,463.61 (T)			

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Name and Address of Claimant	Claim #	Debtor	Claim Amoun Priority (1		Grounds For Objection	Objection Page Reference
TATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY ŒEHANDELAR SAGATINO & ASSOCIATES LLC	50957	Motors Liquidation	\$0.00 \$0.00		Insufficient Documentation	Pgs. 1-4
71 EAST BROAD STREET STE 1200		Company				
DLUMBUS, OH 43215			\$0.00	(P)		
			\$16,727.75	(U)		
			\$16,727.75	(T)		
TATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY	Liqu	Motors	\$0.00	(S)	Insufficient	Pgs. 1-4
EEHANDELAR SABATINO & ASSOCIATES LLC 71 EAST BROAD STREET STE 1200		Liquidation Company	\$0.00	(A)	Documentation	
COLUMBUS, OH 43215			\$0.00	(P)		
			\$8,236.63	(U)		
			\$8,236.63	(T)		
			40.00			
TATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY /O ZEEHANDELAR SABATINO & ASSOCIATES LLC 71 EAST BROAD STREET SUITE 1200 OLUMBUS, OH 43215	50970	Motors Liquidation	\$0.00		Insufficient Documentation	Pgs. 1-4
		Company	\$0.00	(A)		
			\$0.00	(P)		
			\$5,060.75	(U)		
			\$5,060.75	(T)		
TATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY	50971 Motors Liquidation Company		\$0.00	(S)	Insufficient	Pgs. 1-4
% ZEEHANDELAR SABATINO & ASSOCIATES LLC 71 EAST BROAD STREET SUITE 1200			\$0.00	(A)	Documentation	
COLUMBUS, OH 43215			\$0.00	(P)		
			\$4,686.25	(U)		
			\$4,686.25	(T)		
TATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY	50974	Motors	\$0.00	(S)	Insufficient	Pgs. 1-4
O ZEEHANDELAR SABATINO & ASSOCIATES LLC		Liquidation Company	\$0.00	(A)	Documentation	
71 E BROAD ST STE 1200 COLUMBUS, OH 43215			\$0.00	(P)		
			\$5,567.55	(U)		
			\$5,567.55	(T)		
TATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY	50980	Motors	\$0.00	(S)	Insufficient	Pgs. 1-4
70 ZEEHANDELAR, SABATINO & ASSOCIATES, LLC 71 E BROAD ST, STE 1200	50700	Liquidation Company	\$0.00		Documentation	<i>5</i>
COLUMBUS, OH 43215			\$0.00	(P)		
			\$14,596.70	(U)		
			\$14,596.70	(T)		

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference		
THRESHER, MAE 064 POINCIANA DR	33500	Motors Liquidation		Insufficient Documentation	Pgs. 1-4		
CARLISLE, OH 45005		Company					
			Unliquidated				
UDO GUNZEL 16 RUE DE CERDAGNE 1170 TOURNEFEUILLE FRANCE	33038	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4		
FRANCE							
			Unliquidated				
WEBER, ROBERT F 33550 N DOVE LAKES DR APT 2034	45099	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4		
CAVE CREEK, AZ 85331							
			Unliquidated				
ZAIZAR, RAMIRO D	30672	Motors Liquidation	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4		
852 EILEEN ST 3 YPSILANTI, MI 48198		Company	\$0.00 (A)				
115112411, NII 40170			\$0.00 (P)				
			\$5,000.00 (U) \$5,000.00 (T)				
Claims to be Disallowed 97	\$10,000.00	(S)					
and Expunged Totals	\$0.00						
	\$12,500.00	(P)					
	\$26,742,733.73	(U)					

\$26,765,233.73 (T)

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.