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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
In re)	Case No. 09-50026 (REG)
)	(Jointly Administered)
General Motors Corp., <i>et al.</i>)	
)	Chapter 11
Debtors.)	
_____)	

**LIMITED OBJECTION OF MATERIAL MANAGEMENT SERVICES, INC. TO
NOTICE OF (I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN
EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY,
AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II)
CURE COSTS RELATED THERETO**

Material Management Services, Inc. ("MMS"), by and through their undersigned counsel, hereby submits this limited objection (the "Objection") to the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Costs Related Thereto (the "Notice"). In support of its Objection, MMS states as follows:

1. On June 1, 2009, Debtors commenced these voluntary cases under chapter 11 of the Bankruptcy Code.
2. On June 2, 2009, this Court entered an order (the "Bidding Procedures Order") which, *inter alia*, approved procedures regarding Debtors' assumption and assignment of executory contracts.
3. On or about June 5, 2009 and pursuant to the Bidding Procedures Order, Debtors delivered the Notice to MMS indicating Debtors' intent to assume and assign certain of Debtors

agreements with MMS (the “MMS Assumed Contracts”). Debtors identify \$1,473,986.50 as the proposed cure amount for the MMS Assumed Contracts (the “Proposed Cure Amount”).

4. MMS has determined that the Proposed Cure Amount is less than the amount of prepetition defaults under the MMS Assumed Contracts. Specifically, the Proposed Cure Amount does not include \$54,342.57 in additional prepetition defaults (the “Additional Cure Amounts”). Attached as Exhibit A is a spreadsheet showing the Additional Cure Amount.

5. MMS has no objection to the assumption and assignment of the MMS Assumed Contracts so long as the Additional Cure Amount is similarly paid.

WHEREFORE, MMS respectfully requests that the Court enter an order compelling Debtors to increase the Proposed Cure Amount for the MMS Contracts to \$1,528,329.07.

DATED: June 11, 2009

Respectfully submitted,

/s/ Marc B. Merklin

Marc B. Merklin (Admitted *Pro Hac Vice*)

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Attorneys for Material Management Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served on this 11th day of June, 2009, via the Court's ECF system on those parties registered to receive notice.

/s/ Marc B. Merklin
Marc B. Merklin

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Customer	Description	Invoice#	Cust P/O#	St#	Inv Date	Amount
000010	GM FINANCIAL SHARED SERVICES	0031553	FLS21253	FAB	06/05/09	2,014.00
000010	GM FINANCIAL SHARED SERVICES	1015182	GMR90243	PP	03/31/09	14,337.49
000010	GM FINANCIAL SHARED SERVICES	1015184	GMR90260	PP	04/15/09	7,825.61
000010	GM FINANCIAL SHARED SERVICES	1015192	GMR90277	PP	05/15/09	5,312.45
000010	GM FINANCIAL SHARED SERVICES	1015148	GMR90198	PP	04/30/09	4,073.26
000010	GM FINANCIAL SHARED SERVICES	1015195	GMR90327	PAR	04/30/09	2,524.00
000010	GM FINANCIAL SHARED SERVICES	1014888	PPS50494	PAR	04/30/09	2,038.40
000010	GM FINANCIAL SHARED SERVICES	1015193	GMR90284	PP	05/22/09	1,790.50
000010	GM FINANCIAL SHARED SERVICES	1003421	PPR72928	PAR	08/14/07	1,463.04
000010	GM FINANCIAL SHARED SERVICES	1015151	PPR82329	PP	05/31/09	1,203.66
000010	GM FINANCIAL SHARED SERVICES	1004250	GMS15955	GMS	09/20/07	1,127.07
000010	GM FINANCIAL SHARED SERVICES	1015194	GMR90312	PP	05/15/09	985.80
000010	GM FINANCIAL SHARED SERVICES	1005756	PPR73308	PAR	11/26/07	740.48
000010	GM FINANCIAL SHARED SERVICES	1012403	PPR73748	PAR	10/16/08	681.30
000010	GM FINANCIAL SHARED SERVICES	1012052	PPR77648	PAR	09/27/08	605.92
000010	GM FINANCIAL SHARED SERVICES	1015150	PPR82326	PP	04/30/09	491.50
000010	GM FINANCIAL SHARED SERVICES	1008184	PPR73110	PAR	03/17/08	490.00
000010	GM FINANCIAL SHARED SERVICES	1007278	GMS17188	GMS	02/08/08	440.00
000010	GM FINANCIAL SHARED SERVICES	1006557	PPR73625	PAR	12/26/07	434.10
000010	GM FINANCIAL SHARED SERVICES	1009252	PPR77492	PAR	05/09/08	368.00
000010	GM FINANCIAL SHARED SERVICES	1005013	PPR74429	PAR	10/18/07	367.51
000010	GM FINANCIAL SHARED SERVICES	0019523	LTR39128	ASSY	12/27/07	351.70
000010	GM FINANCIAL SHARED SERVICES	1013303	PPR79973	PAR	12/11/08	347.20
000010	GM FINANCIAL SHARED SERVICES	0025706	LTS76288	ASSY	07/10/08	320.00
000010	GM FINANCIAL SHARED SERVICES	1014707	PPS51139	PP	04/15/09	315.00
000010	GM FINANCIAL SHARED SERVICES	1015191	PPR81907	PAR	05/29/09	313.38
000010	GM FINANCIAL SHARED SERVICES	1014890	PPS51773	PAR	04/30/09	301.30
000010	GM FINANCIAL SHARED SERVICES	1015183	PPS52158	PAR	05/28/09	265.82
000010	GM FINANCIAL SHARED SERVICES	0019524	LTR39143	ASSY	12/27/07	262.48
000010	GM FINANCIAL SHARED SERVICES	0029247	FLR20467	FAB	10/15/08	258.40
000010	GM FINANCIAL SHARED SERVICES	1015174-1	EMER916	PAR	05/28/09	218.00
000010	GM FINANCIAL SHARED SERVICES	1014912	PPR81632	PAR	04/30/09	214.40
000010	GM FINANCIAL SHARED SERVICES	1002885	PPR72801	PAR	07/06/07	195.33
000010	GM FINANCIAL SHARED SERVICES	1006531	PPR73535	PAR	12/26/07	181.44
000010	GM FINANCIAL SHARED SERVICES	1006533	PPS47665	PAR	12/26/07	157.75
000010	GM FINANCIAL SHARED SERVICES	1014885	PPS51796	PAR	04/30/09	149.17
000010	GM FINANCIAL SHARED SERVICES	0017747	LTR39040	ASSY	10/24/07	148.58
000010	GM FINANCIAL SHARED SERVICES	1004246	PPR73990	PAR	09/19/07	127.62
000010	GM FINANCIAL SHARED SERVICES	1015187	PPR81859	PAR	05/29/09	120.00
000010	GM FINANCIAL SHARED SERVICES	1006555	PPS48530	PAR	12/26/07	104.40
000010	GM FINANCIAL SHARED SERVICES	0019521	LTR39099	ASSY	12/27/07	101.19
000010	GM FINANCIAL SHARED SERVICES	1006598	PPR75358	PAR	12/27/07	87.34
000010	GM FINANCIAL SHARED SERVICES	1012605-2	EMER567	PAR	12/10/08	79.67
000010	GM FINANCIAL SHARED SERVICES	0023014	LTS76423	PNT	04/23/08	75.00
000010	GM FINANCIAL SHARED SERVICES	0023277	LTR40677	ASSY	04/29/08	61.60
000010	GM FINANCIAL SHARED SERVICES	0020941	FLS19670	FAB	02/15/08	58.86
000010	GM FINANCIAL SHARED SERVICES	0019843	LTS75363-HE	PNT	01/09/08	53.25
000010	GM FINANCIAL SHARED SERVICES	1013802	GMS30037	GMS	12/08/08	35.00
000010	GM FINANCIAL SHARED SERVICES	1008946	PPR74417	PAR	04/24/08	28.18
000010	GM FINANCIAL SHARED SERVICES	0019515	LTR38937	ASSY	12/27/07	27.78
000010	GM FINANCIAL SHARED SERVICES	1010427	PPS49637	PAR	07/10/08	19.00

000010	GM FINANCIAL SHARED SERVICES	0027402	FLR20163	FAB	08/28/08	16.02
000010	GM FINANCIAL SHARED SERVICES	1007381	PPR76068	PAR	02/13/08	15.20
000010	GM FINANCIAL SHARED SERVICES	0019513	LTR38869	ASSY	12/27/07	14.82
000010	GM FINANCIAL SHARED SERVICES	0021094	FLS19708	FAB	02/20/08	3.60
						\$ 54,342.57