KEMP KLEIN LAW FIRM Norman D. Orr (P#25310) (pro hac vice) 201 W. Big Beaver Suite 600 Troy, MI 48084 (248) 740-5693

KEMP KLEIN LAW FIRM

Gloria M. Chon (P#72013) (pro hac vice) 201 W. Big Beaver Suite 600 Troy, MI 48084 (248) 740-5689

Attorneys for Custom Automotive Services, Inc.

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

----- X

In re

GENERAL MOTORS CORP., et al.<sup>1</sup>,

Chapter 11

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered) ----- X

## LIMITED OBJECTION OF CUSTOM AUTOMOTIVE SERVICES, INC. TO DESIGNATED CURE AMOUNT FOR DESIGNATED ASSUMABLE EXECUTORY **CONTRACTS RELATED TO DEBTORS' MOTION SEEKING** APPROVAL OF PROCEDURES FOR SALE OF DEBTORS' ASSETS AND ESTABLISHING RELATED ASSUMPTION AND ASSIGNMENT PROCEDURES

CUSTOM AUTOMOTIVE SERVICES, INC. ("CAS") objects to the cure amount listed by the debtors (the "Debtors") in the Debtors' 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 Amounts Related Thereto, dated June 5, 2009 (the "Notice"), which the Debtors sent to CAS in relation to: (i) the Debtors' motion

<sup>&</sup>lt;sup>1</sup> A list of the Debtors and their respective tax identification numbers may be found on the docket for Case No. 09-50026 (REG), Docket No. 274, and can also be found at www.gmcourtdocs.com.

seeking, in part, entry of an order approving proposed procedures for the sale of Debtors' assets and establishing related procedures for assuming and assigning certain assumable executory contracts (the "<u>Sale Motion</u>") (Docket No. 92); and (ii) the Order signed on June 2, 2009 (I) Approving Procedures For Sale of Debtors' Assets Pursuant to Master Sale and Purchase Agreement With Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser; (II) Scheduling Bid Deadline and Sale Hearing Date; (III) Establishing Assumption and Assignment Procedures; and (IV) Fixing Notice Procedures and Approving Form of Notice (the "<u>Sale</u> <u>Procedures Order</u>") (Docket No. 274).

### **INTRODUCTION**

1. The Sale Motion requests entry of an order which in part confirms the amount of cure amounts payable by the Debtors in connection with the assumption of certain executory contracts, including the contracts between one or more of the Debtors and CAS (the "<u>Cure Amount</u>"). The Sales Procedures Order approves the procedure for making that determination.

2. In the Notice, the Debtors state that the Debtors maintain a secured website which contains information about CAS's assumable executory contracts, including the amount that the Debtors believe must be paid to cure all prepetition defaults under such contracts (the "<u>Contract</u> <u>Website</u>").

3. The Debtors state in the Contract Website that the amount the Debtors believe to be necessary to cure all existing defaults under any and all agreements between one or more of the Debtors and CAS within the meaning of Section 365 of the Bankruptcy Code is \$571,884.41 (the "<u>Stated Cure Amount</u>").

4. CAS does not object to the assumption and assignment of the contracts between one or more of the Debtors and CAS, but objects that the Stated Cure Amount is not accurate.

CAS also objects to the measure proposed by Debtors regarding how the Cure Amount should be determined. Debtors appear to contend that the Cure Amount should be the amount of the "pre-petition defaults". CAS contends that the total obligations accrued to CAS and which remain unpaid as of the date of the assumption and assignment (including amounts accrued for services pre and post petition irrespective of whether the amounts are past due), is the appropriate measure of the amount which must be paid pursuant to Section 365 of the U.S. Bankruptcy Code.

5. The Stated Cure Amount is not sufficient to cure all of the Debtors' obligations under the contracts with CAS with regard to services rendered prior to the bankruptcy. CAS and the Debtors are parties to Purchase Order Number GMB07167, as amended (the "<u>CAS</u> <u>Contract(s)</u>").

6. CAS believes the Stated Cure Amount includes only the amounts accrued for services rendered by CAS to one or more of the Debtors during the period of time prior to May 1, 2009, except that the Stated Cure Amount fails to include \$486.88 owed by one or more of the Debtors for services rendered by CAS as reflected in Invoice #4284, dated April 30, 2009 and attached hereto as **Exhibit A**. Therefore, the total amount owed to CAS by one or more of the Debtors for services rendered through April 30, 2009 is \$572,371.29.

Further, the Stated Cure Amount fails to include the Debtors' obligations to CAS for the pre-petition services rendered by CAS for one or more of the Debtors following April 30, 2009, but prior to the date of the Debtors' bankruptcy filing.

8. The invoices for services rendered following April 30, 2009, but prior to the date the Debtors filed their bankruptcy petition are attached hereto as **Exhibit B** (the "Invoices for

<u>May 2009 Services</u>") and one or more of the Debtors owe CAS \$273,969.36 in the aggregate with regard to the Invoices for May 2009 Services.

9. In total, one or more of the Debtors therefore owe(s) CAS \$846,340.65 for all prepetition services rendered by CAS consisting of \$572,371.29 for services rendered through April 30, 2009, plus \$273,969.36 for services rendered in May 2009 as evidenced by the Invoices for May 2009 Services.

10. CAS continues to provide services post-petition under the CAS Contract(s).

11. Under Section 365 of the Bankruptcy Code, CAS objects to the approval of any Cure Amount that is less than the full amount which remains unpaid as of the date of the assumption of the CAS Contract(s) for CAS's pre-petition and post-petition services to one or more of the Debtors, including, without limitation, the \$846,340.65 due for services rendered prior to the filing of the Debtors' bankruptcy and the full amount of the accrued obligations for services rendered following the bankruptcy.

12. CAS asserts that the entire amount of accrued but unpaid obligations from one or more of the Debtors to CAS (including both pre and post petition services which arose in connection with the CAS Contract(s)) is the proper measure of the amount which Debtors or the purchaser must pay to CAS. CAS further contends that the Stated Cure Amount is not correct and that the proper cure amount should be \$846,340.65 plus any amounts owed for post-petition services pursuant to the CAS Contract(s), less any payments made prior to the assumption.

#### **<u>RELIEF REQUESTED</u>**

CAS respectfully requests that this Honorable Court condition the Debtors' ability to assume and assign any contract(s) between any of the Debtors and CAS on payment of the full amounts owed to CAS in connection with the subject contract(s), including both pre-petition and

post-petition obligations to CAS, which are still owing as of the time of the assumption of any contract between one or more of the Debtors and CAS, including, without limitation, the \$846,340.65 owed for pre-petition services and any amounts owed for services rendered following the filing of the bankruptcy but prior to the effective date of any assumption and assignment of the contract(s).

Respectfully Submitted:

KEMP KLEIN LAW FIRM

By: <u>/s/ Gloria M. Chon</u>

Gloria M. Chon (P#72013) (pro hac vice) Counsel for Custom Automotive Services, Inc. 201 W. Big Beaver Suite 600 Troy, MI 48084 (248) 740-5689 gloria.chon@kkue.com

June 11, 2009 633851

# EXHIBIT A

. . .

ч. -		CUSTOM AUTOMOT	IVE SERVICES, INC.		
DATE:	April 30, 2009	Sterling Heigl (586) 26	dgewood hts, MI 48310 54-0790 264-0793	IN	<b>WOICE</b> # 4284
200 Rena	ications king Center aissance Center 11 48265-2000		VENDOR # P.O. # RELEASE # Re: Heritage Cent	62.291 3887 GMB07167 GMR90011	
Attn:	Dorothy Maniaci M	IC 482-C30-C76	Re: Heritage Cent Requested by David Da EA # 2009-A6465-EF10	arovitz	
00043 00053 00056	1294-0A6N 1416-015K 1416-01AH	Vehicle Prep Level 3 Driver Manager	175.00 each 27.50 / hour 47.5 / hour	1 4 4.25	\$175. \$170. \$201.
		<b>u</b>	Total this inv		\$486.
	PL	EASE PAY FROM THIS	INVOICE		
	, 		1 an at	5/B	
		· · · · · ·			· · ·
				· ·	

# EXHIBIT B





CUSTOM AUTOMOTIVE SERVICES, INC.

DATE: June 3, 2009

5545 Bridgewood Sterling Heights, MI 48310 (586) 264-0790 FAX (586) 264-0793

INVOICE # 4289

Communications **GM Tracking Center** 200 Renaissance Center Detroit, MI 48265-2000

00068

VENDOR # P.O.# **RELEASE**# 62 291 3887 GMB07167

1.5

Re: Danish Press Corps.

Attn: Dorothy Maniaci MC 482-C30-C76

1416-01AL

Requested by David Darovitz EA # 2009-A6465-EF10

an an de d	alahan ang mangkarang karang kara Karang karang k		and a second	lida an an Alba	
00042	1294-0A6R	Vehicle Prep Level 1	25.00 each	1	\$25.00
00044	1294-0A92	Vehicle Prep Level 5	225.00 each	1	\$225.00
00075	1431-008G	Mechanic	35.00 / hour	1	\$35.00
00056	1416-01AH	Manager	47.5 / hour	1	\$47.50

**Total this involce** 

45.00 / hour

\$400.00

\$67.50

PLEASE PAY FROM THIS INVOICE

Travel Manager

		CUSTOM AUTOM		-		
DATE:	June 3, 2009	Sterling He	3ridgew aights, N 264-07	11 48310	IN	IVOICE # 4290
		FAX (58	36) 264-	0793		
200 Ren	nications king Center aissance Center Al 48265-2000		VENDO P.O. # RELEA		62 291 3887 GMB07167	
Attn:	Dorothy Maniaci	MC 482-C30-C76		ted by David Darovitz 09-A6465-EF10		
00042 00044 00075	1294-0A6R 1294-0A92 1431-008G	Vehicle Prep Level 1 Vehicle Prep Level 5 Mechanic		25.00 each 225.00 each 35.00 / hour	1 1 0.5	\$25.00 \$225.00 \$17.50
				Total this Invoice		\$267.50
	Р	LEASE PAY FROM THIS	INVOICE	t.		

			ERVICES, INC.		
June 3, 2009	Sterling H (586	eights, M ) 264-07	ll 48310 90	IN	VOICE # 4291
cations ing Center issance Center I 48265-2000		P.O. #	SE#	62 291 3887 GMB07167 erica Event	
Dorothy Maniaci N	AC 482-C30-C76	EA # 20	09-A6465-EF10	Z	
1294-0A92 1416-01AH 1294-09TM	Vehicle Prep Level Manager Travel		225.00 each 47.5 / hour 1.00 / dollar Total this invoice	1 9.5 19.4	\$225.00 \$451.28 \$19.40 \$695.66
PL	EASE PAY FROM THIS				
Ī	cations ing Center ssance Center 48265-2000 Dorothy Maniaci M 1294-0A92 1416-01AH 1294-09TM	June 3, 2009 Sterling H (586 FAX (5 cations ing Center 48265-2000 Dorothy Maniaci MC 482-C30-C76 1294-0A92 1416-01AH 1294-09TM Travel	June 3, 2009 Sterling Heights, M (586) 264-07 FAX (586) 264- FAX (586) 264- FAX (586) 264- FAX (586) 264- FAX (586) 264- FAX (586) 264- FAX (586) 264- P.O. # Ssance Center P.O. # Ssance Center RELEAS 48265-2000 Re: Dorothy Maniaci MC 482-C30-C76 Request EA # 20 1294-0A92 Vehicle Prep Level 5 1416-01AH Manager 1294-09TM Travel	(586) 264-0790FAX (586) 264-0793cationsVENDOR #ing CenterP.O. #ssance CenterRELEASE #48265-2000Re:Good Morning AmeDorothy Maniaci MC 482-C30-C76Requested by David Darovit EA # 2009-A6465-EF101294-0A92Vehicle Prep Level 51294-0A92Vehicle Prep Level 51294-0A92Vehicle Prep Level 51294-0A97Travel1294-09TMTravel	June 3, 2009Sterling Heights, MI 48310IN(586) 264-0790FAX (586) 264-0793FAX (586) 264-0793cationsVENDOR #ing CenterP.O. #ssance CenterRELEASE #48265-2000Re:Good Morning America EventDorothy Maniaci MC 482-C30-C76Requested by David Darovitz EA # 2009-A6465-EF101294-0A92Vehicle Prep Level 5 1416-01AH225.00 each1294-0A92Vehicle Prep Level 5 1294-09TM225.00 each1294-09TMTravel1.00 / dollar19.4Total this invoice

.....

			onve s Bridgew	_		
DATE:	June 3, 2009	Sterling He (586)		II 48310 90	I	NVOICE # 4292
200 Ren:	ications king Center aissance Center fl 48265-2000		VENDO P.O, # RELEAS Re:		62 291 3887 GMB07167 noto Shoot	
Attn:	Dorothy Maniaci	MC 482-C30-C76		ted by David Darov 09-A6465-EF10	itz Mariator a de ana	
00044 00061 00068 00069	1294-0A92 1294-09TM 1416-01AL 1416-01AM	Vehicle Prep Level 5 Travel Travel Manager Travel Manager Ove		225.00 each 1.00 / dollar 45.00 / hour 58.50 / hour	1 42.68 12.25 9	\$225.00 \$42.68 \$551.25 \$526.50
	PL	EASE PAY FROM THIS	INVOICE	Total this invoice	<del>ç</del>	\$1,345.43



			Anto None			
		CUSTOM AUT	DMOTIVE S			
			15 Bridgewo			
DATE:	June 3, 2009		Heights, M		IN	VOICE # 4293
		•	86) 264-07 (586) 264-0			fr 4690
			(000) 2044	// 50		
<b>~</b> ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	in a his con			<b>.</b>	00 004 0057	
Commun GM Trac	king Center		VENDO P.O. #	<b>≺</b> #	62 291 3887 GMB07167	
200 Rena	aissance Center /II 48265-2000		RELEAS	SE #		
	/// 46265-2000		Re:	David Letterman Sh	low	
Attn:	Dorothy Maniaci	MC 482-C30-C76	Request	ed by David Darovitz		
7 III.		mo 402-000 070	EA # 20	09-A6465-EF10		
00056 00061	1416-01AH 1294-09TM	Manager Travel		47.5 / hour 1.00 / dollar	21.25 833.72	\$1,009.38 \$833.72
				Total this invoice		
				Total this invoice		\$1,843.10
	ł	PLEASE PAY FROM T	HIS INVOICE			

}ent By:	: CUSTOM	AUTOMOTIVE SE	RVICE; 586 264 0793	; Jun-9-09 12:	06; Page 3
			CUSTOM AUTOMOTIVE	SERVICES, INC.	, 
	DATE:	June 3, 2009	5545 Bridge		
		·	Sterling Heights,		INVOICE # 4294
			(586) 264-( FAX (586) 26		
				- 0700	
	GENERA	L MOTORS COR	PORATION VE	NDOR #	62 291 3887
•	100 Rena	issance Center		D, #	GMB07167
	Detroit, M	1 48285-1000	KC.	LEASE #	GMR87378
	Attn:	Sean Finegan 1	MC 482-A25-D35	APACC Annual Dinr	ier
	00044	1294-0A92	Vehicle Prep Level 5	225.00 each	
	00075	1431-008G	Mechanic	35.00 / hour	1 \$225.00 2 \$70.00
	00076 00053	1431-008H 1416-015K	Mechanic Overtime Driver	45.50 / hour	8 \$364.00
	00061	1294-09TM	Travel	27.50 / hour 1.00 / dollar	0.25 \$6.88 104.76 \$104.76
	00069	1416-01AM	Travel Manager Overtime	= 58.50 / hour	8 \$468.00
				Total this invoice	\$1,238.64
			PLEASE PAY FROM THIS INVO	DICE	
			· ·		• . •
					· · · · · · · · · · · · · · · · · · ·
			· · · · · · · · · · · · · · · · · · ·		
			·		
		••		1	
		· · · · · · · · · · · · · · · · · · ·		and a second	an an ann ann an ann an ann an ann an an
			and reasoning the schemes a surgery	1 · · ·	
	··· ·		•		
đ.			•		
ß			•		₹,

Sent B	3y: CUSTOM	AUTOMOTIVE SERVICE	; 586 264 0793	; Jun-9-09 12:	06; Page 4
		· ·	CUSTOM AUTOMOTIVE	SERVICES, INC.	
	DATE:	June 3, 2009	5545 Bridge Storling Usights		INVOICE
			Sterling Heights (586) 264-		# 4295
			FAX (586) 26		
					•
	GENER	AL MOTORS CORPOR		NDOR #	62 291 3887
	Chevy R	acing aissance Center	Ρ,	O. #	GMB07167
		MI 48265-1000	RE	ELEASE #	GMR88388
	Attn:	Jeff Chew MC 482-A	29-D76	Raceshop: Monthly	Chames
	00040	1429-00AH	Storage (Vehicles)		
	00041	1429-00AG	Storage (Parts)	6.75 each .90 / sq ft	1331 \$8,984.25 926 \$833.40
	00042	1294-0A6R	Vehicle Prep Level 1	25.00 each	9 \$225.00
	00044 00075	1294-0A92 1431-008G	Vehicle Prep Level 5	225.00 each	3 \$675.00
	00050	1416-01AA	Mechanic Technician	35.00 / hour	15.25 \$533.75
	00053	1416-015K	Driver	40.00 / hour 27.50 / hour	21 \$840.00
	00056	1418-01AH	Manager	47.5 / hour	2.75 \$75.63 30 \$1,425.00
	00060	1294-09TN	Support	1.00 / dollar	578.59 \$578.59
	00061 00065	1294-09TM 1415-00JK	Travel	1.00 / dollar	2675.58 \$2,675.58
	00068	1416-01AL	Scheduler Travel Manager	37.50 / hour	35 \$1,312.50
	00069	1416-01AM	Travel Manager Overtime	45.00 / hour 58.50 / hour	91.5 \$4,117.50 50.25 \$2,939.63
	00070	1416-01AN	Travel Manager Holiday	78.50 / hour	50.25 \$2,939.63 43.5 \$3,327.75
	00072	1416-01AP	Technician Senior	45.00 / hour	2.25 \$101.25
				Total this Invoice	\$28,644.83
		PLEA	SE PAY FROM THIS INV	DICE	
					•
	•				
	•				
	•		· · · · · · · · · · · · · · · · · · ·		
					***

Sent By: CUSTON	AUTOMOTIVE SERVIC	E; 586 264 079	93; Jun-9-09 1	2:06;	Page 5
DATE:	June 3, 2009	CUSTOM AUTOMOTA 5545 Bride Sterling Height (586) 264 FAX (586) 2	gewood ts, MI 48310 4-0790	- - - - - - - - - - - - - - - - - - -	NVOICE # 4296
100 Ren P O Box	9 Shows & Exhibits Dep aissance Center 100 MI 48265-1000	F	VENDOR # P.O. # RELEASE #	62:291 3887 GMB07167 GMR88767	
Attn: Sc	ott Settlemire MC 482-/	A25-D41	Auto Shows & Exhibits: Mo	nthly Charges	
00040 00041 00042 00044 00075 00076 00049 00053 00056 00061 00065		Storage (Vehicles) Storage (Parts) Vehicle Prep Level 1 Vehicle Prep Level 5 Mechanic Mechanic Overtime Mechanic Holiday Driver Manager Travel Scheduler	6.75 each .90 / sq ft 25.00 each 225.00 each 35.00 / hour 45.50 / hour 59.50 / hour 27.50 / hour 47.5 / hour 1.00 / dollar 37.50 / hour <b>Total this invoice</b>	394 150 1 13.75 3.5 12 0.5 26 1353.38 50	\$2,659.50 \$135.00 \$25.00 \$481.25 \$159.25 \$714.00 \$13.75 \$1,235.00 \$1,353.38 \$1,875.00 \$8,876.13
	·····			• • • • • • • • • • • • • • • • • • •	· .
J				*	

Sent 3	Y: CUSTON	AUTOMOTIVE SERV:	ICE; 586 264 0793;	Jun-9-09 12:	06;	Page 6
	DATE:	June 3, 2009	CUBTOM AUTOMOTIVE S 5545 Bridgev Sterling Heights, I (586) 264-07 FAX (586) 264	vood VI 48310 790	•	INVOICE # 4297
	VSSM N 100 Ren	AL MOTORS CORPC larketing Services aissance Center MI 48265-1000	P.O.	DOR # # EASE #	62 291 388) GMB07167 GMR86436	,
	Attn:	Sean Finegan MC	482-A25-D35	Chevrolet: Monthly	Charges	
				Ren .		
	00040 00041 00042 00043 00044 00075 00050 00053 00056 00057 00060 00061 00065 00068 00069 00072	1429-00AH 1429-00AG 1294-0A6R 1294-0A92 1431-008G 1416-01AA 1416-01AK 1416-01AH 1416-01AJ 1294-09TN 1294-09TM 1415-00JK 1416-01AL 1416-01AM 1416-01AP	Storage (Vehicles) Storage (Parts) Vehicle Prep Level 1 Vehicle Prep Level 3 Vehicle Prep Level 5 Mechanic Technician Driver Manager Manager Manager Manager Support Travel Scheduler Travel Manager Travel Manager Travel Manager	6.75 each .90 / sq ft 25.00 each 175.00 each 225.00 each 35.00 / hour 40.00 / hour 27.50 / hour 47.5 / hour 1.00 / dollar 1.00 / dollar 37.50 / hour 45.00 / hour 58.50 / hour 45.00 / hour	$\begin{array}{r} 3625\\ 33035\\ 15\\ 4\\ 1\\ 22.25\\ 52\\ 1.25\\ 78\\ 0.25\\ 735.86\\ 1449.64\\ 142.25\\ 47.5\\ 2.5\\ 19.5\\ \end{array}$	\$24,468.75 \$29,731.50 \$375.00 \$700.00 \$225.00 \$778.75 \$2,080.00 \$34.38 \$3,705.00 \$15.44 \$735.86 \$1,449.64 \$5,334.38 \$2,137.50 \$146.25 \$877.50 \$72,794.95
		PLE	EASE PAY FROM THIS INVOI			J/2,/94.90
					· · · ·	
				· · ·	· · · · · · · · · · · · · · · · · · ·	*

Sent By:	CUSTOM A	UTOMOTIVE SERVICE	; 586 264 0	793; Jun	-9-09 12:06;		Page 7
	DATE:	June 3, 2009	Sterling Heig (586) 2	TVE SERVICES, idgewood hts, MI 48310 64-0790 264-0793	D INC.	IN	VOICE # 4298
	VSSM Mar 100 Renais	MOTORS CORPORA keting Services ssance Center 48265-1000	ATION	VENDOR # P.O. # RELEASE #	GME	91 3887 307167 386442	
	Attn:	Sean Finegan MC 48	2-A25-D35	Saab: M	onthly Charges		
						unez:	
( ( ( (	00056 00060	1429-00AH 1429-00AG 1416-01AA 1416-01AH 1294-09TN 1415-00JK 1418-01AP	Storage (Vehicles) Storage (Parts) Technician Manager Support Scheduler Technician Senior	6.75 eac .90 / sq f 40.00 / h 47.5 / ho 1.00 / do 37.50 / h 45.00 / h	t iour ur illar our	651 40 2.25 5.5 89.89 11.75 1.5	\$4,394.25 \$36.00 \$90.00 \$261.25 \$89.89 \$440.63 \$67.50
					s Involce		\$5,379.52
		PLEA	SE PAY FROM THIS	INVOICE			
		•• •					
	· · ·						·······
Ĵ.					۰ ۲	*	

Sent By:	CUSTOM	AUTOMOTIVE SERVIC	∃; 586 264	0793;	Jun-9-09 12:	07; Page 8
ם	DATE:	June 3, 2009	CUSTOM AUTOMO 5545 B Sterling Hei (586) 2 FAX (586	ridgew ghts, N 264-07	ood 11 48310 90	INVOICE # 4299
· · · · · · · · · · · · · · · · · · ·	SSM Mar 00 Renais	MOTORS CORPORA keting Services sance Center 48265-1000	TION	VEND P.O. 1 RELE		62 291 3887 GMB07167 GMR88124
At	ttn:	Sean Finegan MC 482	2-A25-D35		Oldsmobile: Monthly	Charges
						Charlin: T.T.T.
00 00 00 00 00	0041 0050 0056 0060 0065	1429-00AH 1429-00AG 1416-01AA 1416-01AH 1294-09TN 1415-00JK 1416-01AP	Storage (Vehicles) Storage (Parts) Technician Manager Support Scheduler Technician Senior		6.75 each .90 / sq ft 40.00 / hour 47.5 / hour 1.00 / dollar 37.50 / hour 45.00 / hour	930\$6,277.508000\$7,200.008\$320.0047.5\$2,256.25245.4\$245.4053\$1,987.5011.5\$517.50
					Total this involce	\$18,804.15
		PLEA	SE PAY FROM THIS	INVOID	E	
d e	,	· · · · · · · · · · · · · · · · · · ·	· ·			

VSSM Marki			264-0793	
Detroit, MI 4	NOTORS CORPORA eting Services ance Center 8265-1000	TION	VENDOR # P.O. # RELEASE #	62 291 3887 GMB07167 GMR86425
Attn: s	ean Finegan MC 482	2-A25-D35	Cadillac: Monthly C	charges
		Elescoloped.		
00041   1     00075   1     00050   1     00056   1     00060   1     00065   1	429-00AH 429-00AG 431-008G 416-01AA 416-01AH 294-09TN 415-00JK 416-01AP	Storage (Vehicles) Storage (Parts) Mechanic Technician Manager Support Scheduler Technician Senior	6.75 each .90 / sq ft 35.00 / hour 40.00 / hour 47.5 / hour 1.00 / dollar 37.50 / hour 45.00 / hour	930 \$6,277.50   6750 \$6,075.00   0.75 \$26,25   26.5 \$1,060.00   39.25 \$1,864.38   210.14 \$210.14   27.25 \$1,021.88   25.5 \$1,147.50
			Total this invoice	\$17,682.65
	PLEAS	SE PAY FROM THIS IN	VOICE	
•	· · · · · · · · · · · · · · · · · · ·	· · · ·	·····	
		The second secon	···· •	

T BY: CUSTOM AUTOMOTIVE SERVE	ICE; 586 264 0793	; Jun-9-09 12:	09; Page 19/19
2 * 22		SERVICES, INC.	
DATE: June 3, 2009	5545 Bridge Sterling Heights, (586) 264-0 FAX (586) 264	wood MI 48310 0790	INVOICE # 4301
GM Performance Division 30100 Mound Road Warren, MI 48090	P.0	IDOR # . # .EASE #	62 291 3887 GMB07167 TCR21597
Attn: Rod Green MC 480-113-5	327	Design Center: Month	nly Charges
Water Henrick		and the second sec	A DESCRIPTION OF A
000401429-00AH000411429-00AG000421294-0A6R000431294-0A6N000751431-008G000531416-015K000561416-01AH000651415-00JK000681416-01AL	Storage (Vehicles) Storage (Parts) Vehicle Prep Level 1 Vehicle Prep Level 3 Mechanic Driver Manager Scheduler Travel Manager	6.75 each .90 / sq ft 25.00 each 175.00 each 35.00 / hour 27.50 / hour 47.5 / hour 37.50 / hour 45.00 / hour	2244 \$15,147.00   1000 \$900.00   1 \$25.00   1 \$175.00   1 \$35.00   0.75 \$20.63   29 \$1,377.50   68 \$2,550.00   0.5 \$22.50
		Total this Invoice	\$20,252.63
PLE	EASE PAY FROM THIS INVO	DICE	
			•
			-5-09
		."	
17 17 18 18 18 18 18 18 18 18 18 18 18 18 18			
ji .			
л			

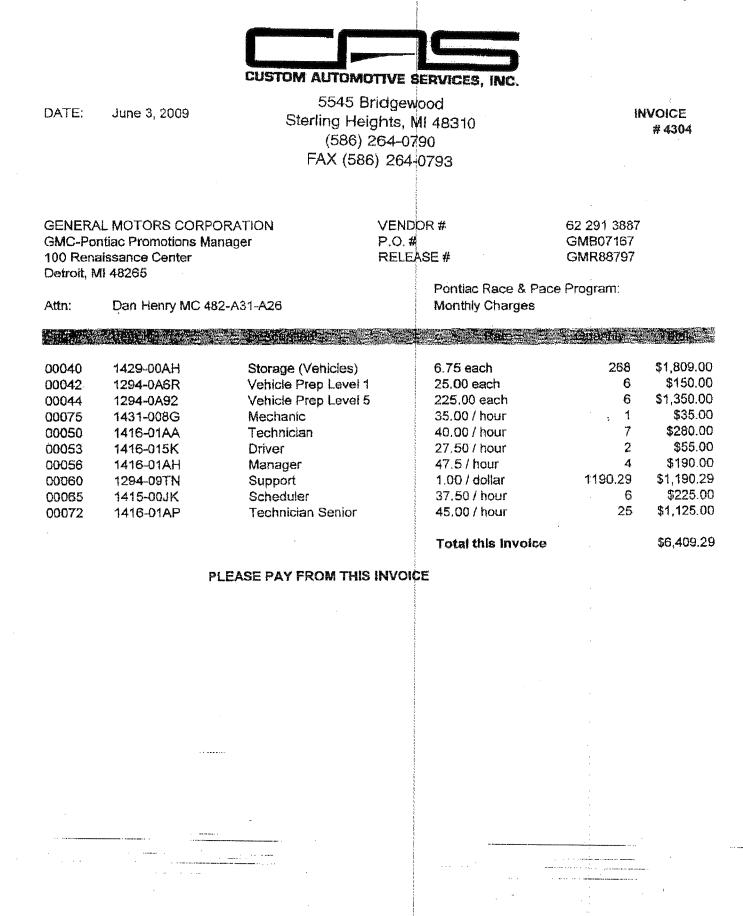
		CUSTOM AUTON	NOTIVE SERVICES, INC.	
DATE:	June 3, 2009	5545 Sterling He (586)	Bridgewood eights, MI 48310 1264-0790 36) 264-0793	INVOICE # 4302
VSSM Ma 100 Rena	AL MOTORS CORPO arketing Services aissance Center Al 48265-1000	RATION	VENDOR # P.O. # RELEASE #	62 291 3887 GMB07167 GMR86422
Attn:	Sean Finegan MC	482-A25-D35	Buick: Monthly	Charges
00040 00041 00050 00056 00060 00065 00068 00068 00072	1429-00AH 1429-00AG 1416-01AA 1416-01AH 1294-09TN 1415-00JK 1416-01AL 1416-01AP	Storage (Vehicles) Storage (Parts) Technician Manager Support Scheduler Travel Manager Technician Senior	6.75 each .90 / sq ft 40.00 / hour 47.5 / hour 1.00 / dollar 37.50 / hour 45.00 / hour 45.00 / hour	589   \$3,975     5190   \$4,671     13.75   \$550     48.75   \$2,315     244.98   \$244     49   \$1,837     114   \$5,130     2.25   \$101
			Total this invo	ice \$18,826
	PL	EASE PAY FROM THI	S INVOICE	
				•
	····· · · · · · · · · · · · · · · · ·		11 / Mandrada (11 - M	• • • • • • • • • • • • • • • • • • •
	· · ·	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	المراجعة من المراجع الم المراجع المراجع المراجع مستوسية المستقد المراجع
				2

,¥

	~	~	~	4	
1	a	Q.	e	1	

-----

			264-0790 6) 264-0793		# 4303
			0/ 204 0/ 30		
V/CCLARA	L MOTORS CORPC	RATION	VENDOR #	62 291 3887	<del>7</del>
400 Ø	arketing Services		P.O. #	GMB07167	
	aissance Center Il 48265-1000		RELEASE #	GMR88083	
Attn:	Sean Finegan MC	482-A25-D35	Pontiac: Monthly	Charges	
an a				<b>Distrantity</b>	
00040	1429-00AH	Storage (Vehicles)	6.75 each	1051	\$7,094.2
00041	1429-00AG	Storage (Parts)	.90 / sq ft	575	\$517.5
00075	1431-008G	Mechanic	35.00 / hour	1	\$35.0
00050	1416-01AA	Technician	40.00 / hour	25.25	\$1,010.0
00053	1416-015K	Driver	27.50 / hour	0.5	\$13.7
00056	1416-01AH	Manager	47.5 / hour	52.5	\$2,493.7
00060	1294-09TN	Support	1.00 / dollar	215.05	\$215.0
00072	1415-00JK 1416-01AP	Scheduler Technician Ocaci	37.50 / hour	64.5	\$2,418.7
00072	14 10-0 IAP	Technician Senior	45.00 / hour	2.25	\$101.2
		,	Total this involu	<b>.</b> e	\$13,899.3
	PL	EASE PAY FROM THIS	S INVOICE		
. '			···· .		
an a sharalaan a sa	······		4 σ σ σ σ σ σ σ σ σ σ σ σ σ σ σ σ σ σ σ		
	na farmanna ann an taonach	· · · ·	f man a state		



Sent B	y: CUSTOM	AUTOMOTIVE SERVI	CE; 586-26	4 0793;	Jun-9-09 1	2:08;	Page 13/19
			CUSTOM AUTON		CES, INC.		
	DATE:	June 3, 2009	5545 Sterling H (586	Bridgewood eights, MI 48 ) 264-0790 86) 264-0793	310		INVOICE # 4305
	VSSM M 100 Ren	AL MOTORS CORPO arketing Services alssance Center II 48265-1000	RATION	VENDOR # P.O. # RELEASE		62 291 38 GMB0716 GMR8642	7
	Attn:	Sean Finegan MC 4	482-A25-D35	S	atum: Monthly C	harges	
		Renato/	<b>Deserver</b> on		<b>Fate</b>	C).cm/ify	
	00040 00050 00056 00065	1429-00AH 1416-01AA 1416-01AH 1415-00JK	Storage (Vehicles Technician Manager Scheduler	40 47	75 each 0.00 / hour 7.5 / hour 7.50 / hour	155 0.5 4.75 2	\$20.00 \$225.63
				1	otal this Invoice		\$1,366.88
		PLE	ASE PAY FROM TH	IIS INVOICE			
						. ' '	
						•	
		······				·. •.	
			. Augustatus				
Ŕ						- 	

Sent a	By: CUSTO	M AUTOMOTIVE SE	RVICE; 586-26	4 0793;	Jun-9-09	12:08;	Page 14/19
	DATE:	June 3, 2009	Sterling H (586	<b>NOTIVE SERV</b> Bridgewood leights, MI 48 5) 264-0790 586) 264-079	3310		INVOICE # 4306
	P.O. Box Detroit, N	alssance Center ( 100 11 48265-1000		VENDOR # P.O. # RELEASE	#	62 291 388 GMB07167 GMR88232	7
	Attn:	Ray Bush MC 48	2-A20-B98	GM Mobility	y: Monthly Charg		77017400442-0002759224000-0075202-00
	00040 00041 00042 00050	1429-00AH 1429-00AG 1294-0A6R 1416-01AA	Storage (Vehicles Storage (Parts) Vehicle Prep Leve Technician	.9 911 29	75 each 00 / sq ft 5,00 each 0,00 / hour	42 400 2 2	\$360.00 \$50.00
	00053 00056 00065	1416-015K 1416-01AH 1415-00JK	Driver Manager Scheduler	2 4 3	7.50 / hour 7.5 / hour 7.50 / hour 	1 1.75 1	\$83.13
		F	PLEASE PAY FROM TH	IIS INVOICE			
					,		
						:	
					·	- 	
ала 1910 — Малана 191			·				
Jack Starter						. <b>v</b>	

Sent By	: CUSTOM	AUTOMOTIVE	SERVICE;
---------	----------	------------	----------

i

	DATE:	June 3, 2009	Sterling (58	5 Bridgewo 5 Bridgewo Heights, M 36) 264-079 (586) 264-0	od I 48310 90		INVOICE # 4307
	VSSM M 100 Rena	L MOTORS CORP arketing Services aissance Center 11 48265-1000	ORATION	P.O. 🕯	OOR # # ASE #	62 291 38 GMB0716 GMR8642	7
	Attn:	Sean Finegan MC	C 482-A25-D35		Enthusiast Spe	cial Events: Montl	ly Charges
	00075 00050 00053 00056 00060 00065 00068 00068	1431-008G 1416-01AA 1416-015K 1416-01AH 1294-09TN 1415-00JK 1416-01AL 1416-01AP	Mechanic Technician Driver Manager Support Scheduler Travel Manage Technician Ser		35.00 / hour 40.00 / hour 27.50 / hour 47.5 / hour 1.00 / dollar 37.50 / hour 45.00 / hour 45.00 / hour	173.75 114 363 64 146.59 15 136.25 176.5	\$4,560.00 \$9,982.50 \$3,040.00 \$146.59 \$562.50 \$6,131.25
					Total this Invo	lcə	\$38,446.59
		P	LEASE PAY FROM	THIS INVOID	E	·	
						···· · · · · · · · · · · · · · · · · ·	
Â						• • •	

Sent B	y: CUSTOM	AUTOMOTIVE SERVI	CE; 586-264	0793;	Jun-9-09 12:	08;	Page 16/19
	DATE:	June 3, 2009	Sterling Hei (586)	<b>TTIVE SERVICE</b> ridgewood ghts, MI 4831 264-0790 3) 264-0793		11	NVOICE # 4308
	VSSM Ma 100 Rena	L MOTORS CORPOF arketing Services issance Center I 48265-1000	RATION	VENDOR # P.O. # RELEASE #		62 291 3887 GMB07167 GMR86430	
	Attn:	Sean Finegan MC 4	82-A25-D35	GMC	: Monthly Charg	68	
	00040 00041 00042 00075 00050 00056 00065 00072	1429-00AH 1429-00AG 1294-0A6R 1431-008G 1416-01AA 1416-01AH 1415-00JK 1416-01AP	Storage (Vehicles) Storage (Parts) Vehicle Prep Level 1 Mechanic Technician Manager Scheduler Technician Senior	35.00 40.00 47.57 37.50		767 200 1 1.75 1.25 17 26 8.25	\$5,177.25 \$180.00 \$25.00 \$61.25 \$50.00 \$807.50 \$975.00 \$371.25
					this invoice		\$7,647.25
		PLE	ASE PAY FROM THIS	INVOICE			
						• • •	
						· · · ·	
J.							м. По во 1997 г.

Sent By: CL	ISTOM	AUTOMOTIV	Έ	SERVICE:
-------------	-------	-----------	---	----------

t By: CUSTC	DM AUTOMOTIVE SE	RVICE; 586 264	0793; Jun-9-	09 12:08;	Page 17/19
				1. 	
DATE:	June 3, 2009	5545 Br Sterling Heig (586) 2	ridgewood ghts, MI 48310 264-0790 1) 264-0793	,	NVOICE # 4309
Vehicle F 30003-Va	AL MOTORS CORP Performance Center an Dyke Avenue MI 48090-9065		VENDOR # P.O. # RELEASE #	62 291 3887 GMB07167 TCR19669	
Attn:	Craig Shantz MC Cube # 168-06	480-717-004	Performance Division: I	Monthly Charges	12607-011-00111-1000110-010-010-010-010-010
00040 00041 00044 00075 00056 00065	1429-00AH 1429-00AG 1294-0A92 1431-008G 1416-01AH 1415-00JK	Storage (Vehicles) Storage (Parts) Vehicle Prep Level 5 Mechanic Manager Scheduler	35.00 / hour 47,5 / hour 37,50 / hour	558 800 1 0.5 12.5 23.75	\$3,766.50 \$720.00 \$225.00 \$17.50 \$593.75 \$890.63
	b	LEASE PAY FROM THIS	Total this Inv	roice	\$6,213.38
					• •
				• • • •	
				, , , , , , , ,	
		· · · · · · · · · · · · · · · · · · ·			

. ...

CUSTOM AUTOMOTIVE SERVICES, INC.		
	· 4	
ATE: June 3, 2009 5545 Bridgewood Sterling Heights, MI 48310	INVOICE	
(586) 264-0790	# 4310	
FAX (586) 264-0793		
ENERAL MOTORS CORPORATION VENDOR # 62		
SSM Marketing Services P.O. # GM	291 3887 B07167	
	MR86424	
tn: Sean Finegan MC 482-A25-D35 Hummer: Monthly Charge	es	
040 1429-00AH Storage (Vehicles) 6.75 each		
041 1429-00AG Storage (Parts) .90 / sq ft	205 \$1,383.75 50 \$45.00	
050 tata bata medinane 35.007 nour	1.5 \$52.50	
056 1416-01AH Manager 47.5 / hour	0.25 \$10.00	
065 1415-00JK Scheduler 37.50 / hour	1 \$47.50 4 \$150.00	
068 1416-01AL Travel Manager 45.00 / hour	1 \$45.00	
072 1416-01AP Technician Senior 45.00 / hour	1 \$45.00	
Total this Invoice	\$1,778.75	
PLEASE PAY FROM THIS INVOICE		
	•	
	· · · · · · · · · · · · · · · · · · ·	
	· · · · · · · · · · · · · · · · · · ·	



CUSTOM AUTOMOTIVE SERVICES, INC.

DATE: June 3, 2009

5545 Bridgewood Sterling Heights, MI 48310 (586) 264-0790 FAX (586) 264-0793

INVOICE # 4312

200 Ren:	ications king Center aissance Center /I 48265-2000		VENDO P.O. # RELEA Re:		62 291 3887 GMB07167	
Attn:	•	MC 482-C30-C76	EA # 20	ted by Mark Rollinson 09-A6052-14		C. 147
dame sa huk	a an		anten (* 1947) - Antoleo y Service Solet - Sale Alfred Sciences (* 1967) Solet - Sale Alfred Sciences (* 1967)		lang ang ang ang ang ang ang ang ang ang	
00042 00043 00075	1294-0A6R 1294-0A6N 1431-008G	Vehicle Prep Level 1 Vehicle Prep Level 3 Mechanic		25.00 each 175.00 each 35.00 / hour	1 1 1	\$25.00 \$175.00 \$35.00
				Total this Invoice		\$235.00
	Ρ	LEASE PAY FROM THIS	INVOICE			