

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

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

-----X
: **Chapter 11 Case No.**
: **09-50026 (REG)**
: **(Jointly Administered)**
: **Debtors.**
:
:
-----X

NOTICE OF DEBTORS' 106TH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

PLEASE TAKE NOTICE that on September 23, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "**Debtors**"), filed their 106th omnibus objection to expunge certain claims (the "**106th Omnibus Objection to Claims**"), and that a hearing (the "**Hearing**") to consider the 106th 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 **October 26, 2010 at 9:45**

a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE 106TH 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 106th 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-399 (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 CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 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., Robert Schmidt, 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: Tracy Hope Davis, 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 **October 19, 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 106th 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 106th 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
September 23, 2010

/s/ Joseph H. Smolinsky _____
Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

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Attorneys for Debtors and
Debtors in Possession

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

-----X
In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* :
: :
Debtors. : (Jointly Administered)
: :
-----X

DEBTORS' 106TH 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 106th omnibus objection to certain claims (the “**106th 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 106th 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 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 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

¹ 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, www.motorsliquidation.com. 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.

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**”)² 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**”)³ 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 person or entity to file a proof of claim in the Realm/Encore Debtors’ cases (except

² 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.).

³ The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

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 Ord. at 2.)⁴

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*

⁴ Notices of the Bar Date Order contained express references to this requirement.

and Expunged' do not include sufficient documentation to ascertain the nature or validity of these claims. A reasonable opportunity was provided to each claimant to rectify the deficiencies. Thus, the Debtors request that the Court disallow and expunge in their entirety the Claims with Insufficient Documentation.

Notice

11. Notice of this 106th Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Fourth 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 August 24, 2010 [Docket No. 6750]. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

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
September 23, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

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EXHIBIT A

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ANDERS, DONNA J 171 STONEBROOK LN EDMOND, OK 73003	23402	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ANDERSON, DAVID T PO BOX 707 LEBANON, OH 45036	25355	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ANJARD SR, RONALD P 10942 MONTEGO DR SAN DIEGO, CA 92124	29493	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ANTHONY J KAMINSKAS 9 THREE OAKS LANE BLUFFTON, SC 29910	23375	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ARCH K LINDSAY 131 N MAUDE LN ANAHEIM, CA 92807	27265	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

(1) 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".

(2) 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
ARCH LINDSAY 131 N MAUDE LN ANAHEIM, CA 92807	27264	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ARTHUR G WALKER 7246 N DORT HWY MOUNT MORRIS, MI 48458	28988	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ATWELL, WILLIAM S 9810 FOXWAY CT DEXTER, MI 48130	20968	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
BAKER JR, EDWARD J 931 CASTLEBAR DR N TONAWANDA, NY 14120	29718	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
BAKER, AMY L 931 CASTLEBAR DR N TONAWANDA, NY 14120	29717	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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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
BATOR, CLAIRE P 6569 RAINIER DR APT A INDIANAPOLIS, IN 46214	25450	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
BIRCHMEIER, THOMAS E G4271 W MAPLE AVE FLINT, MI 48507	20786	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
BOOMER, SHIRLEY M 5565 E MAIN ST BOX 128 DRYDEN, MI 48428	4311	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
BRENDA PEARL 660 FLORLAND DR FLORISSANT, MO 63031	23578	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
CARDEN, JAMES MICHAEL 46344 CANDLEBERRY DR CHESTERFIELD, MI 48047	14422	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
CASSINGER, ARTHUR 2491 HIGHWAY H NEELYVILLE, MO 63954	20175	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CHRISTINE WILSON 182 GOULD RD CHARLTON, MA 01507	20781	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CHROMEY, MARIE 500 BROWN ST APT 215 DURYEA, PA 18642	28114	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CLEMENTS, SENOIL 10346 BEACONSFIELD ST DETROIT, MI 48224	21074	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
COLBURN, ELIECE 2009 VINEVILLE AVE APT C101 MACON, GA 31204	28054	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
COLE, OPAL T 7755 E STATE ROUTE 571 TIPP CITY, OH 45371	21635	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
CRAWFORD, BOBBY J 3527 33RD ST MERIDIAN, MS 39307	29560	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
CROSBY, LEE ETTA 9947 NORTHAMPTON DR SAINT LOUIS, MO 63137	27228	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
DAVIS III, BOYDEN E 7898 BEAVER RD SAINT CHARLES, MI 48655	9531	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
DELLAS, GEORGE J 4255 GULF SHORE BLVD N APT 906 NAPLES, FL 34103	29566	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					

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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
DENNIS COTTRILL & PENNY COTTRILL C/O MCKENNA & ASSOCIATES PC 436 BOULEVARD OF THE ALLIES SUITE 500 PITTSBURGH, PA 15219	44598	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
DERWIN VANCE 429 HARRIET ST DAYTON, OH 45408	9854	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
DEYOUNG, DONALD R 7136 CHURCH PARK DR FORT WORTH, TX 76133	29014	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
DIANE ALLEN 2161 COLLEGE DR GLENDALE HTS, IL 60139	20863	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
DICE, JUNE L PO BOX 6014 KOKOMO, IN 46904	28127	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DICKENSON, SAMUEL D 232 PHELPS ACRES RD 17 JAMESTOWN, KY 42629	28291	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
DOROTHY HAMRICK 440 LAUREL PARK CIR COOKEVILLE, TN 38501	29553	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
EDGLEY, JACQUELINE 12729 E LUPINE AVE SCOTTSDALE, AZ 85259	19154	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
EDWARDS, NANCY 730 ADAMS CIR POCASSET, OK 73079	28946	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
EVERETT, DOROTHY G 6833 DEADSTREAM RD HONOR, MI 49640	4363	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FERRANTE, SCOTT P 15619 CHURCHILL ST SOUTHGATE, MI 48195	20868	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
FRANK E BIANCO 4100 LONGHILL DR SE WARREN, OH 44484	18225	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GINGELL, LYNNE C 3819 WESGATE DR COLUMBUS, GA 31907	61739	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GLORIA SLEEMAN 3506 CROSSHAVEN LN TALLAHASSEE, FL 32309	28010	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GRANDISON, KAREN MICHELE 18662 SCHAEFER HWY DETROIT, MI 48235	30645	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HABERLY, NORMAN L PO BOX 3037 NEDERLAND, CO 80466	28943	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HAMRICK, DOROTHY C 440 LAUREL PARK CIR COOKEVILLE, TN 38501	29543	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HAWKINS, LINDA 6892 PIN OAK DR BOSTON, NY 14025	22768	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HEARD JR, AARON 4850 S LAKE PARK AVE APT 2002 CHICAGO, IL 60615	65671	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HEIDEMANN, NANCY L 728 BELGRADE AVE NORTH MANKATO, MN 56003	43379	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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CLAIMS TO BE DISALLOWED AND EXPUNGED

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HILL, CARL E 509 SPRUCE ST APT B LIVINGSTON, TN 38570	44779	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HILLIER, MARILOUISE 515 S HAWKINS RD GLADWIN, MI 48624	23096	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HUDLER, JANIE W 192 GARDEN STATION RD AVONDALE, PA 19311	4180	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
HUEGERICH JR, DONALD J 2850 FARBROOK TRL OXFORD, MI 48370	4190	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JACKSON, BEVERLY L 3197 LOWER RIVER RD SE SOUTH EAST DECATUR, AL 35603	61750	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

(1) 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".

(2) 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
JANIE HUDLER 192 GARDEN STATION RD AVONDALE, PA 19311	4179	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JONES, JOSEPH S 655 GREEN MEADOW DR GREENWOOD, IN 46143	18280	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KENNEDY, KATHLEEN M 7528 HWY W VANDALIA, MO 63382	30650	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KENNEDY, WILLIAM D 5895 MARSH RD APT 252 HASLETT, MI 48840	18229	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KLEJMENT, JOHN G 325 LAURELTON RD ROCHESTER, NY 14609	23461	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

(1) 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".

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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
KUHNS, SARAH J 250 ROSERY RD NW APT 215 LARGO, FL 33770	14559	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
LANCE, BRENT A 310 SAINT THEODORE CT WENTZVILLE, MO 36685	23576	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
LAURA STEWART-TRAYVICK 3548 DARIEN DR DAYTON, OH 45426	19123	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
LOUVENIA VAN BUREN 18530 GLENWOOD BLVD LATHRUP VILLAGE, MI 48076	4188	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
LUIGIA TREVISI (TREVISI FERRUCCIO WIFE) VIA P VERONESE 19 TREVISO TV ITALY 31100 ITALY	23945	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
LUTKENHAUS, CHARLES A 2616 E HOPE ST MESA, AZ 85213	20173	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MC GUINTY, MICHAEL A 8708 53RD TER E BRADENTON, FL 34211	25453	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MICHAEL, ROBERT V 198 N HURON RD AU GRES, MI 48703	20841	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MILLER, GARY M 633 W PINE GROVE RD FAIR PLAY, SC 29643	44613	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
MOORE, MELVIN P 707 213TH ST PASADENA, MD 21122	21055	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
MOSES, SHERRY A 16000 LANDAUER ST BASEHOR, KS 66007	20769	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
NACCARATO, DESIREE A 680 81ST ST APT 4G BROOKLYN, NY 11228	23580	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
OVERTON ROBERT N 14470 HORSESHOE TRCE WELLINGTON, FL 33414	29567	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
PARRISH, CYNTHIA A 234 W. JEFFERSON ST TIPTON, IN 46072	61738	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
PAUL, THOMAS J 3741 LAUREL DR NW ACWORTH, GA 30101	29455	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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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
PEREZ, CARMEN CALLE DE LA ARENA #14-2-F CEDEIRA CORLINA 15350 SPAIN . SPAIN	20176	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
POWELL, DEBORAH K 1844 ROCHESTER RD LEONARD, MI 48367	30659	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
REED, WILLIAM M 1031 ROSE HILL RD HAMERSVILLE, OH 45130	20136	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
RENTERIA, LILLIAN A 301 CAPISTRANO DR MODESTO, CA 95354	18217	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROBERT G OSBORN 719 N GATEWAY AVE ROCKWOOD, TN 37854	28342	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
ROBERT HOLFORD 6327 S ISABELLA RD SHAPHERD, MI 48883	11053	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
ROBINSON, SIDNEY J 810 E WHIPP RD DAYTON, OH 45459	23472	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
RONALD BAJOR 79 MIDESSA CT DOVER, DE 19904	13008	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
RONALD HOOPER 2251 PARKWOOD DR NW WARREN, OH 44485	29544	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
RONALD NICHOLS 7 MAUMEE CT ADRIAN, MI 49221	20165	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					

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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
RUHL, CHARLES M 1213 SHEFFIELD DRIVE SOMERSET CTR, MI 49282	20874	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SANDRA HALL 9560 LONE PINE ST WHITE LAKE, MI 48386	20122	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SHARLENE A VICKERY 7500 E MCCORMICK PKWY #79 SCOTTSDALE, AZ 85258	23487	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SHORT, GERALD N 4854 ELK CT MORGANTON, NC 28655	23357	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SLEEMAN, GLORIA J 3506 CROSSHAVEN LN TALLAHASSEE, FL 32309	28009	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		

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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
SMYKOWSKI, VALENTINA 7274 HELEN CENTER LINE, MI 48015	29583	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SNYDER, VIRGINIA A. 1500 AMY CIRCLE DELTONA, FL 32738	30660	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
STASZAK, PAMELLA A 6978 MEDITERRANEAN RD D ORLANDO, FL 32822	25366	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
STEVEN CARLSON 1436 S GRANT AVE JANESVILLE, WI 53546	9796	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
THOMAS, TONI D. 508 ROHR LN ENGLEWOOD, OH 45322	26625	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
THORPE, MARY J 3744 S 450 E RUSHVILLE, IN 46173	44694	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
TOMMIE K EDWARDS 1437 BETTY DR BEAVERCREEK, OH 45434	25354	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
TRAHAN, LAWRENCE A 1385 SHANKIN DRIVE WOLVERINE LK, MI 48390	21479	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
WALTON, SHARON K 8858 LONDON GROVEPORT RD GROVE CITY, OH 43123	26626	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
WILLARD BREEN C/O MARY ELIZABETH SCHNEGGENBURGER, POA 57 LOUVAINE DR BUFFALO, NY 14223	44659	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					

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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
WILSON, CHRISTINE H 182 GOULD RD CHARLTON, MA 01507	20780	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
WINDY, RAYMOND G 1876 DALEY DR REESE, MI 48757	44893	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
WITHROW, PAMELA D 8525 STEVENS AVE S BLOOMINGTON, MN 55420	20817	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
WOLFE, VIRGINIA B PO BOX 106 IRON RIDGE, WI 53035	20882	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
ZIVICA, FRANK B 2250 MINNEOLA RD CLEARWATER, FL 33764	20880	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					

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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
<i>CLAIMS TO BE DISALLOWED AND EXPUNGED</i>	100		\$0.00 (S)		
			\$0.00 (A)		
			\$0.00 (P)		
			\$0.00 (U)		
			\$0.00 (T)		

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
:
In re : **Chapter 11 Case No.**
:
MOTORS LIQUIDATION COMPANY, et al., : **09-50026 (REG)**
f/k/a General Motors Corp., et al. :
:
Debtors. : **(Jointly Administered)**
:
-----X

ORDER GRANTING DEBTORS' 106TH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

Upon the 106th omnibus objection to expunge certain claims, dated September 23, 2010 (the “**106th Omnibus Objection to Claims**”),¹ 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 106th Omnibus Objection to Claims; and due and proper notice of the 106th 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

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the 106th Omnibus Objection to Claims.

106th Omnibus 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 106th 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 106th 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”** (the “**Order Exhibit**”) 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, if applicable, the 106th Omnibus Objection to Claims is adjourned with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Adjourned*” (the “**Adjourned Claims**”) to the date indicated on the Order Exhibit, subject to further adjournments (such actual hearing date, the “**Adjourned Hearing Date**”), and the Debtors’ response deadline with respect to the Adjourned Claims shall be 12:00 noon (Eastern Time) on the date that is three (3) business days before the Adjourned Hearing Date; and it is further

ORDERED that, if applicable, the 106th Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Withdrawn*”; and it is further

ORDERED that, if applicable, the 106th Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Claim Withdrawn*” as those claims have been withdrawn by the corresponding claimant; 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 106th 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 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