

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re

MOTORS LIQUIDATION COMPANY, et al.,	:	Chapter 11 Case No.
f/k/a GENERAL MOTORS CORP., et al.	:	09-50026 (REG)
	:	(Jointly Administered)
Debtors.	:	
		Creditor Response

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

Ann F. McHugh, Creditor of Motors Liquidation Company (f/k/a General Motors Corporation) (“MLC) and its affiliated debtors, by her attorneys, Galbo and Bader, respectfully represents:

1. That this response is in opposition to debtors’ objection to the claim of Ann F. McHugh, debtors request to expunge her claim.
2. That the above-named creditor, Ann F. McHugh, is the surviving spouse of Richard McHugh.
3. That Richard McHugh was a former employee of General Motors.
4. That Ann F. McHugh currently receives a pension in the amount of \$495.61 per month and health insurance coverage from debtors.
5. That Ann F. McHugh is 84 years of age, and is in deteriorating health.
6. That she does not fully understand the nature and importance of these proceedings.
7. That she did not advise any of her children that she had received a request to submit further documentation, and therefore clarify the basis of her claim.

8. That by the time her family became aware of debtor's request for further information the date to submit same had already passed.

9. That Ann F. McHugh requests additional time to submit information in support of her claim.

10. That Ann F. McHugh has no wish to delay these proceedings, but submits that there is little prejudice to the debtors because the debtors are aware that she is a pensioner, that they possess records indicating the amount of her monthly payment, as well as the cost of her health insurance benefits.

11. That debtors request for additional information is an unwarranted burden on pensioners of such advanced age, and in declining mental and physical health.

WHEREFORE, the creditor, Ann F. McHugh respectfully requests entry of an Order granting her an additional, reasonable period of time to submit information to clarify her claim in accordance with the debtors' request.

Dated: Williamsville, New York
October 18, 2010

/s/ Thomas S. Galbo
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