

Hearing Date and Time: To Be Determined
Response Deadline: December 13, 2010
EVIDENTIARY HEARING REQUESTED

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM(S). THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS IN EXHIBIT A ATTACHED TO THIS OBJECTION

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*Special Counsel to the Official Committee of Unsecured
Creditors of Motors Liquidation Company f/k/a General
Motors Corporation*

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

-----X
In re : Chapter 11
MOTORS LIQUIDATION COMPANY, *et al.*, : Case No.: 09-50026 (REG)
Debtors. : (Jointly Administered)
-----X

**NOTICE OF HEARING ON OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' FIRST AMENDED OBJECTION
TO CLAIMS FILED BY GREEN HUNT WEDLAKE, INC. AND
NOTEHOLDERS OF GENERAL MOTORS NOVA SCOTIA
FINANCE COMPANY AND MOTION FOR OTHER RELIEF**

PLEASE TAKE NOTICE that upon the Official Committee of Unsecured Creditors' First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief, dated November

19, 2010 (the “**Application**”), the Official Committee of Unsecured Creditors (the “**Committee**”) of Motors Liquidation Company f/k/a General Motors Corporation and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”) shall move this Court for an order: (i) disallowing the Claims¹ in their entirety; (ii) alternatively, reducing the total Claims to an amount equal to the principal amount of the Notes less the Consent Fee; (iii) to the extent the Claims are allowed, equitably subordinating the Claims to the claims of all other general unsecured creditors; (iv) voiding the Assumption Order under Rule 60(b) of the Federal Rules of Civil Procedure and Rule 9024 of the Federal Rules of Bankruptcy Procedure, but only to the extent that the Assumption Order authorized the Debtors to assume the Lock-Up Agreement and any other obligations incident thereto, including those concerning the Swap Transactions; and (iv) granting the Committee such other and further relief as the Court deems just and proper. A pre-trial conference in connection with this Application 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, NY 10004, on December 15, 2010 at 2:00 p.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that, per a scheduling agreement among certain parties, responses, if any, to the Application must be made in writing, with a hard copy to chambers, conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court and be filed with the Court and served 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 in these cases [Docket No. 5670] so as to be actually

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Application.

received by the parties on the Master Service List, including the undersigned special counsel to the Committee, not later than December 13, 2010.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Application, the relief requested in the Application may be granted without a hearing.

Dated: New York, New York
November 19, 2010

BUTZEL LONG,
a professional corporation

By: /s/ Eric B. Fisher
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