

Hearing Date and Time: December 2, 2010 at 9:45 a.m. (Prevailing Eastern Time)  
Revised Objection Date and Time: November 30, 2010 at 12:00 p.m. (Prevailing Eastern Time)

Elihu Inselbuch, Esq.  
(ei@capdale.com)  
Rita C. Tobin, Esq.  
(rct@capdale.com)  
CAPLIN & DRYSDALE, CHARTERED  
375 Park Avenue, 35<sup>th</sup> Floor  
New York, NY 10152-3500

Trevor W. Swett III  
(tws@capdale.com)  
Kevin C. Maclay  
(kcm@capdale.com)  
James P. Wehner  
(jpw@capdale.com)  
CAPLIN & DRYSDALE, CHARTERED  
One Thomas Circle  
Washington, D.C. 20005  
(202) 862-5000

*Attorneys for the Official Committee of  
Unsecured Creditors Holding Asbestos-Related Claims*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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)  
In re ) Chapter 11  
)  
MOTORS LIQUIDATION COMPANY, *et al.*, )  
f/k/a GENERAL MOTORS CORP., *et al.*, )  
) Case No. 09-50026 (REG)  
)  
Debtors. ) Jointly Administered  
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**AMENDED NOTICE OF HEARING AND EXTENSION OF OBJECTION DEADLINE  
REGARDING THE APPLICATION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS HOLDING ASBESTOS-RELATED CLAIMS FOR AN  
ORDER PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING THE TAKING  
OF DOCUMENT DISCOVERY AND DEPOSITION TESTIMONY FROM THE  
DEBTORS, FROM GENERAL MOTORS, LLC, ITS SUBSIDIARIES AND  
AFFILIATED COMPANIES, AND FROM CERTAIN  
NONBANKRUPT ASBESTOS DEFENDANTS**

**PLEASE TAKE NOTICE** that the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the “**Asbestos Claimants Committee**” or “**ACC**”) has obtained the Court’s permission to extend until noon on November 30, 2010, the deadline for filing and service of any responses by third-parties (other than General Motors LLC) to the Application of the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims for an Order Pursuant to Bankruptcy Rule 2004 Authorizing the Taking of Document Discovery and Deposition Testimony from General Motors, LLC, its Subsidiaries and Affiliated Companies, and from Certain Nonbankrupt Asbestos Defendants (the “**Application**”). The extension is intended to facilitate the making of a written stipulation among the ACC, the Future Claims Representative, the Official Committee of Unsecured Creditors, and the Debtors, which, if executed, will lead to the ACC’s withdrawal of the Application on certain conditions. Under the extension, responsive papers and objections must be delivered to chambers and to the parties by 12:00 noon on November 30, 2010, unless notice of the withdrawal of the Application has been issued before then.

**ACCORDINGLY, PLEASE TAKE NOTICE** that unless the stipulation is executed, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, for approval and signature at Room 621 of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), Alexander Hamilton Custom House, One Bowling Green, New York, on **December 2, 2010 at 9:45 a.m.** (Prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Application must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure

and the Local Rules of the Bankruptcy Court, and shall be (I) (a) filed with the Bankruptcy Court electronically in accordance with General Order M-242 (as amended) (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and (II) served on the following parties in interest in accordance with General Order M-242 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 (the "**Creditors' Committee**"), 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 (the "**Asbestos Claimants' Committee**"), 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.); (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 (the "**Future Claimants' Representative**"), 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 **November 30, 2010 at 12:00 p.m.** (Prevailing Eastern Time) (the "**Objection Deadline**").

**PLEASE TAKE FURTHER NOTICE** that if no objections 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 23, 2010

Respectfully submitted,

CAPLIN & DRYSDALE, CHARTERED

By: /s/ Trevor W. Swett III

Trevor W. Swett III

(tws@capdale.com)

Kevin C. Maclay

(kcm@capdale.com)

James P. Wehner

(jpm@capdale.com)

One Thomas Circle, N.W.

Suite 1100

Washington, D.C. 20005

Telephone: (202) 862-5000

Facsimile: (202) 429-3301

Elihu Inselbuch

(ei@capdale.com)

Rita C. Tobin

(rct@capdale.com)

375 Park Avenue, 35<sup>th</sup> Floor

New York, NY 10152-3500

Telephone: (212) 319-7125

Facsimile: (212) 644-6755

*Attorneys for the Official Committee of Unsecured  
Creditors Holding Asbestos-Related Claims*