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Attorneys for Ogihara America Corporation

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11 Case No.

General Motors Corporation, et al.

09-50026-reg

Debtors.

(Jointly Administered)

OBJECTION OF OGIHARA AMERICA CORPORATION TO PROPOSED CURE COSTS CONTAINED IN 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 COSTS RELATED THERETO

OGIHARA AMERICA CORPORATION, ("<u>Objector</u>") submit this Cure Objection to the proposed cure related costs for the assumption and assignment of the Assumable Executory Contracts (as defined in the Assignment Notice), set forth in the 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 Costs Related Thereto ("<u>Assignment Notice</u>"), served upon Objector on June 5, 2009. In support of its Objection, Objector states:

1. The Contract Website sets forth the amount of \$40,615.11 as the monetary amount required to cure defaults under the Assumable Executory Contracts with Objector.

2. According to the records maintained by Objector, the correct Cure Amount (the "Correct Cure Cost") to be paid to Objector shall be \$108,799.79.

3. The assumption and assignment of the Assumable Executory Contracts between Debtors and Objector shall be conditioned upon the immediate payment of the Correct Cure Cost.

WHEREFORE, Objector respectfully requests that its Objection be sustained and that the assumption of the Assumable Executory Contract be conditioned upon the immediate payment of the Correct Cure Cost.

Respectfully submitted,

WARNER NORCROSS & JUDD LLP

Date: June 12, 2009

BY: /s/Michael G. Cruse MICHAEL G. CRUSE (P38837) Attorneys for Ogihara America Corporation 2000 Town Center, Suite 2700 Southfield, MI 48075 Telephone: 248-784-5131 Fax: 248-603-9731 Email: mcruse@wnj.com

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2009, I served a copy of the:

Objection of Ogihara America Corporation to Proposed Cure Costs Contained in 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 Costs Related Thereto

on the following parties at these addresses via Federal Express:

SEE ATTACHED SPECIAL SERVICE LIST

/s/Helga Ziegler Helga Ziegler Legal Assistant to Michael G. Cruse (P38837) Warner Norcross & Judd LLP Attorneys for Ogihara America Corporation 2000 Town Center, Suite 2700 Southfield, MI 48075-1318 Telephone: 248-784-5131 Fax: 248-603-9731 mcruse@wnj.com

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SPECIAL SERVICE LIST

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