

WARNER NORCROSS & JUDD
2000 Town Center, Suite 2700
Southfield, MI 48075
Telephone: 248-784-5131
Facsimile: 248-603-9731
Michael G. Cruse

Attorneys for Fugra, S.A. de C.V.

**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 FUGRA, S.A. DE C.V. 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**

Fugra, S.A. de C.V., (“Objector”) submits 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 (“Assignment Notice”), served upon Objector on June 5, 2009. In support of its Objection, Objector states:

1. The Contract Website sets forth the amount of \$266,890.73 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 \$346,313.65.

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 Fugra, S.A. de C.V.
2000 Town Center, Suite 2700
Southfield, MI 48075
Telephone: 248-784-5131
Fax: 248-603-9731
Email: mcruse@wnj.com

WARNER NORCROSS & JUDD
2000 Town Center, Suite 2700
Southfield, MI 48075
Telephone: 248-784-5131
Facsimile: 248-603-9731
Michael G. Cruse

Attorneys for Fugra S.A. de C.V.

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

In re:	Chapter 11 Case No.
General Motors Corporation, <i>et al.</i>	09-50026-reg
Debtors.	(Jointly Administered)

CERTIFICATE OF SERVICE

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

Objection of Fugra, S.A. de C.V. 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 Fugra S.A. de C.V.
2000 Town Center, Suite 2700
Southfield, MI 48075-1318
Phone: 248-784-5131
Fax: 248-603-9731
mcruse@wnj.com

SPECIAL SERVICE LIST

Debtors

Lawrence S. Buonomo, Esq.
c/o General Motors Corporation
300 Renaissance Center
Detroit, MI 48265

Attorneys for Debtors

Harvey R. Miller, Esq.
Stephen Karotkin, Esq.
Joseph H. Smolinsky, Esq.
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

U.S. Treasury

Matthew Feldman, Esq.
U.S. Treasury
1500 Pennsylvania Avenue NW, Room 2312
Washington, DC 20220

Attorneys for Purchaser

John J. Rapisardi, Esq.
Cadwalader, Wickersham & Taft LLP
One World Financial Center
New York, NY 10281

Attorneys for Creditors Committee

Robert D. Wolford, Esq.
Miller, Johnson, Snell & Cumiskey, PLC
250 Monroe Avenue, N.W., Suite 800
Grand Rapids, MI 49503

Export Development Canada

Export Development Canada
c/o Michael J. Edelman, Esq.
Michael L. Schein, Esq.
Vedder Price, P.C.
1633 Broadway, 47th Floor
New York, NY 10019

Office of the U.S. Trustee

Diana G. Adams, Esq.
Office of the United States Trustee
for the Southern District of New York
33 Whitehall Street, 21st Floor
New York, NY 10004