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HEARING DATE: September 30, 2009 TIME: 10:30 a.m.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----x In re: Chapter 11 MOTORS LIQUIDATION CORP, et al., Case No. 09-50026 (REG) f/k/a GENERAL MOTORS CORP., et al., : (Jointly Administered) Debtors. RADHA RAMANA MURTY NARUMANCHI (Murty), RADHA BHAVATARINI DEVI : Adversary Proceeding No. 09-00501 (REG) NARUMANCHI (Devi), Plaintiffs, - against -GENERAL MOTORS CORPORATION, et al., Defendants.

NOTICE OF MOTION BY THE UNITED STATES OF AMERICA TO DISMISS THE CLAIMS AGAINST THE FEDERAL DEFENDANTS

PLEASE TAKE NOTICE, that upon this notice of motion and the accompanying memorandum of law and supporting declaration, the United States of America, on behalf of defendants Timothy F. Geithner, Steven Rattner, Ron Bloom, Matthew Feldman, and Harry J. Wilson (the "Federal Defendants"), by its attorney Lev L. Dassin, Acting United States Attorney for the Southern District of New York, will move this Court before the Honorable Robert E. Gerber, United States Bankruptcy Judge, at Courtroom 621 of the Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on the 30th day of September, 2009, at 10:30 a.m. (Eastern Time), or as soon thereafter as counsel may be heard, for an order pursuant to Federal Rule of Bankruptcy Procedure 9012 and Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6), dismissing the claims in the adversary complaint of plaintiffs pro se Radha Ramana Murty Narumanchi ("Murty") and Radha Bhavatarini Devi Narumanchi against the Federal Defendants, together with such other and further relief as the Court may find just, proper and equitable.

PLEASE TAKE FURTHER NOTICE, that responses, if any, must (i) be made in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules; (iii) set forth the basis for the response and state with specificity the reason or reasons why the requested relief should not be granted; and (iv) be (a) electronically filed with the Bankruptcy Court at www.nysb.uscourts.gov by registered users of the Bankruptcy court's case filing system, and by all other parties in interest, by submitting to the Clerk of the Bankruptcy Court at The

United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 the response on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, WordPerfect, or any other Windows-based word processing format, and served in accordance with General Order M-242 with a paper copy delivered directly to the Chambers of the Honorable Robert E. Gerber, United States Bankruptcy Judge for the Southern District of New York, together with proof of service thereof, and (b) served upon (i) the United States Attorney's Office, 86 Chambers Street, Third Floor, New York, New York 10007, (Attn: AUSA Joseph N. Cordaro), (ii) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., Joseph H. Smolinky, Esq., and Irwin H. Warren, Esq.); (iii) Gibson Dunn & Crutcher LLP, Attorneys for the Wilmington Trust Company, 200 Park Avenue, New York, New York 10166 (Attn: Adam Offenhartz, Esq., David Feldman, Esq., Matthew J. Williams, Esq., and David J. Kerstein, Esq.), and (iv) the Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, New York 10004, so as to be received no later than 12:00 PM on August 21, 2009, at 4:00 p.m. (Eastern Time).

Dated: New York, New York

July 21, 2009

Respectfully submitted,

LEV L. DASSIN

Acting United States Attorney

By: s/ Joseph N. Cordaro

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