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Response Deadline: August 5, 2010
Reply Deadline: August 26, 2010
Hearing Date: October 21, 2010

Attorneys for Defendant JPMorgan Chase Bank, N.A.

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

In re:	:	Chapter 11 Case
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
<i>f/k/a</i> General Motors Corp., <i>et al.</i> ,	:	
	:	(Jointly Administered)
Debtors.	:	

OFFICIAL COMMITTEE OF UNSECURED	:	Adversary Proceeding
CREDITORS OF MOTORS LIQUIDATION COMPANY	:	
<i>f/k/a</i> GENERAL MOTORS CORPORATION,	:	Case No. 09-00504 (REG)
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
JPMORGAN CHASE BANK, N.A., <i>et al.</i> ,	:	
	:	
Defendants.	:	

**NOTICE OF MOTION FOR SUMMARY JUDGMENT
OF DEFENDANT JPMORGAN CHASE BANK, N.A.**

PLEASE TAKE NOTICE that upon (i) the accompanying Memorandum of Law in Support of Defendant JPMorgan Chase Bank, N.A.'s ("JPMCB") Motion for Summary Judgment; (ii) the accompanying Rule 7056-1(b) Statement of Undisputed Material Facts; (iii) the Declaration of John M. Callagy in support of JPMCB's motion for summary judgment; (iv)

the Affidavit of Richard W. Duker in support of JPMCB's motion for summary judgment; and (v) Affidavit of Debra Homic Hoge, all filed herewith, together with the exhibits identified therein and annexed thereto, JPMCB hereby moves this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure as incorporated into rule 7056 of the Federal Rules of Bankruptcy Procedure), and Rule 7056-1 of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Southern District of New York for an entry of an order granting summary judgment in favor of JPMCB and dismissing all claims brought by the plaintiff, the Official Committee of Unsecured Creditors of Motors Liquidation Company f/k/a General Motors Corporation (the "**Committee**") in the Complaint, dated July 31, 2009 (the "**Complaint**") (the "**Motion**").

PLEASE TAKE FURTHER NOTICE that a hearing ("**Hearing**") will be held in connection with this Motion on October 21, 2010, or as soon thereafter as counsel may be heard, at a time to be determined before the Hon. Robert E. Gerber, United States Bankruptcy Judge, at the United States Court for the Southern District of New York (the "**Court**"), Alexander Hamilton Court House, One Bowling Green, New York, New York 10004, Room 621.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion, must be made (i) in writing; (ii) state with particularity the grounds therefore; (iii) be filed with the Bankruptcy Court (with a hard copy to the Judge's chambers); and (iv) served upon: (a) counsel for the movant JPMCB, Kelley Drye & Warren LLP, 101 Park Avenue, New York, New York 10178, attn: John M. Callagy, Esq., and (b) any and all other parties required by this Court's orders in the above referenced Chapter 11 Case so as to be filed and served so that it is received on or before August 6, 2010. Only those objections which have been timely filed and served may be considered by the Court.

PLEASE TAKE FURTHER NOTICE THAT if you fail to respond in accordance with the Notice, the Court may grant relief requested by the Motion without further notice or hearing.

Dated: New York, New York
July 1, 2010

Respectfully submitted,
KELLEY DRYE & WARREN LLP

/s/ John M. Callagy
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