

Honorable Judge
Robert E. Gerber

United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, N.Y. 10004-1408

Lead Case # 09-50026

In Re:)
) Chapter 11
MOTORS LIQUIDATION COMPANY, et. al) <u>Case # 09-0950026</u>
	Debtors) (Gerber)
(formerly General Motors Corp. et. al.)) Jointly Administered
) August 12, 2009
Official Committee of Unsecured Creditors of Motors) Adversory Proceeding
Liquidation Company f/k/a General Motors Corporation) Case # 09-_____
	Plaintiff)
against)
)
J.P. Morgan Chase Bank, N.A. et al.)
	Defendant)
) Dated August 12, 2009

PERMISSION REQUESTED

TO FILE AMICUS CURIE BRIEF(S), BY CREDITOR R.R.M. NARUMANCHI ("Interested Party")
on the 7-31-2009 Adverse Complaint filed by Official Committee of Unsecured Creditors
of Motor Liquidation Company f/k/a General Motors Corporation (**Docket # 3593**)

Comes now Radha R.M. Narumanchi, a so-called unsecured bondholder and creditor in the lead case ¹, **who would like to hereby request that he be granted advance permission by this honorable court to let him file amicus curie briefs**, in this adversarial proceedings, at appropriate times, for, as an auditor², he has a **totally different perspective** on the events that lead to defendant J.P. Morgan Chase filing the UCC forms 1 and 4, on 11-30-2006 and 10-30-2008, respectively, for the term loan in the amount of \$1.5 billion, and its impact and effect on the status of all so-called unsecured bondholders.


Respectfully submitted.

Dated at New Haven, Conn. 06513, this 12th day of August, 2009.

¹And also a Plaintiff in an adversary proceeding, in this case, in addition to being an appellant against this Court's decision on Section 363 Sale.

² [An ICWA (India); A Corporate Secretary (14/16 papers) (India); an ICMA (14/16 papers) from the United Kingdom; and a CPA (NY) since 1975, with 58 years of experience in business and government since 1951, and 34 years of teaching experience since 1975 in the USA]

CREDITOR ("Interested Party")


8/12/2009

(Radha R.M. Narumanchi)
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New Haven, Conn. 06513
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Certification

This is to certify that a copy of the aforementioned was mailed by first class mail, postage paid this 12th day of August, 2009 to:

- 1) Weil, Gotshal & Manges LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, N.Y. 10153 - Attn: Harvey R. Miller/Stephen Karotkin/Joseph H. Smolinsky;
- 2) Cadwalader, Wickersham & Taft LLP, Attorneys for the Purchaser, One World Financial Center, New York, N.Y. 10281 - Attn: John J. Rapisardi;
- 3) Kramer Levin Naftalis & Frankel LLP, Attorneys for the Creditors Committee, Attorneys for the Creditors Committee, 1177 Avenue of the Americas, New York, N.Y. 10036, Attn: Kenneth H. Eckstein;
- 4) Cleary Gottlieb Steen & Hamilton LLP, Attorneys for the UAW, One Liberty Plaza, New York, N.Y. 10006 - Attn: James L. Bromley;
- 5) Cohen, Weiss and Simon LLP, Attorneys for the UAW, 330 West 42nd Street, New York, N.Y. 10036 - Attn: Babette Ceccotti;
- 6) Vedder Price, P.C., Attorneys for Export Development Canada, 1633 Broadway - 47th Floor, New York, N.Y. 10019 - Attn: Michael J. Edelman/Michael L. Schein;
- 7) Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st floor, New York, N.Y. 10004 - Attn: Diana G. Adams;
- 8) U.S. Attorney's General Office, S.D.N.Y., 86 Chambers Street - Third Floor, New York, N.Y. 10007 - Attn: David S. Jones/Matthew L. Schwartz;
- 9) The Coleman Law Firm, 77 West Wacker Drive, Suite 4800. Chicago, Ill. 6060, Attn: Steve Jakubowski/Elizabeth Richert;
- 10) Butzel Long, Special Counsel to Official Committee of Unsecured Creditors, 380 Madison Avenue, 22nd floor, New York, N.Y. 10017. Attn: Eric B. Fisher/Barry N. Seidel;
- 11) JP Morgan Chase Bank, N.A., P.O. Box 2558, Houston, Texas 77252; and
- 12) Courtesy Copy to the Chambers of Honorable Judge Robert E. Gerber, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, N.Y. 10004-1408


8/12/2009

(Radha R.M. Narumanchi)