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

Lead Case # 09-50026

In Re: MOTORS LIQUIDATION COMPANY, et. al	Debtors) Chapter 11) Case # 09-0950026) (Gerber)) Jointly Administered) August 12, 2009
(formerly General Motors Corp. et. al.)		
Official Committee of Unsecured Creditors of Motors Liquidation Company f/k/a General Motors Corporation	Plaintiff) Adversory Proceeding Case # 09)
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")

Padha P. M. Narumanchi)

(Radha R.M. Narumanchi) 657 Middletown Avenue New Haven, Conn. 06513 Phone: (203) 562-0536

Email: rrm narumanchi@hotmail.com

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

(Radha R.M. Narumanchi)