

Carey D. Schreiber (CS 3896)  
Robert J. Boudreau (RB 1021)  
WINSTON & STRAWN LLP  
200 Park Avenue  
New York, New York 10166  
Tel: (212) 294-6761  
Fax: (212) 294-4700  
Email: cschreiber@winston.com  
rboudreau@winston.com

David J. Richardson  
WINSTON & STRAWN LLP  
333 South Grand Avenue, 38th Floor  
Los Angeles, California 90071  
Telephone: (213) 615-1833  
Facsimile: (213) 615-1750  
Email: djrichardson@winston.com

*Counsel for LG Electronics USA, Inc.*

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

-----X  
In re : Chapter 11  
: :  
: : Case No. 09-50026  
General Motors Corp., *et al.*, : :  
: : (Jointly Administered)  
Debtors. : :  
-----X

**NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Winston & Strawn LLP hereby appears in the above-captioned chapter 11 cases as counsel on behalf of LGE Electronics USA, Inc. (“LGE”) and requests, pursuant to 11 U.S.C. §§ 342 and 1109(b) and Rules 2002, 3017 and 9007 of the Federal Rules of Bankruptcy Procedure, that copies of all papers filed in these cases or in any related proceeding be served on the following individuals at the address set forth below:

David J. Richardson  
WINSTON & STRAWN LLP  
333 South Grand Avenue, 38th Floor  
Los Angeles, California 90071  
Telephone: (213) 615-1833  
Facsimile: (213) 615-1750  
Email: djrichardson@winston.com

**PLEASE TAKE FURTHER NOTICE** that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to or specified above but also includes, without limitation, orders and notices of any application, complaint, demand, motion, petition, plan, disclosure statement, pleading or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, telegraph, telex or otherwise filed or made which affect or seek to affect in any way rights or interests of creditors, parties in interest, any official or *ad hoc* committee of creditors or equity security holders, the above-captioned debtors (the “Debtors”) or the property of the Debtors.

**PLEASE TAKE FURTHER NOTICE** that LGE intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive or otherwise impair or limit (a) LGE’s right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (b) LGE’s right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (c) LGE’s right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) any other rights, claims or actions, to which LGE is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments LGE expressly reserves.

Dated: New York, New York  
June 15, 2009

Respectfully submitted,

WINSTON & STRAWN, LLP

/s/ Carey D. Schreiber

Carey D. Schreiber (CS 3896)

Robert J. Boudreau (RB 1021)

200 Park Avenue

New York, New York 10166-4193

Telephone: (212) 294-6700

Facsimile: (212) 294-4700

cschreiber@winston.com

rboudreau@winston.com

and

David J. Richardson

333 South Grand Avenue, 38th Floor

Los Angeles, California 90071

Telephone: (213) 615-1833

Facsimile: (213) 615-1750

djrichardson@winston.com

*Counsel for LGE Electronics USA, Inc.*