

Varnum LLP
Bridgewater Place
P.O. Box 352
Grand Rapids, MI 49501-0352
(616) 336-6000
Mary Kay Shaver (P-60411)

J.L. French Automotive Castings, Inc.
Nelson Metal Products LLC

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

-----X
In Re: : Chapter 11 Case No.
: :
GENERAL MOTORS CORP., *et al.*, : 09-50026 (REG)
: :
Debtors. : (Jointly Administered)
: :
: Hon. Robert E. Gerber
-----X

**LIMITED OBJECTION BY J.L. FRENCH AUTOMOTIVE CASTINGS, INC.
AND NELSON METAL PRODUCTS LLC TO
NOTICE OF (I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN
EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY,
AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY
AND (II) CURE AMOUNTS RELATED THERETO**

J.L. French Automotive Castings, Inc. and Nelson Metal Products LLC (collectively, "Supplier"), by and through its attorneys, Varnum LLP, hereby files this limited objection to the Notice of (i) Debtors' Intent to Assume and Assign Certain Executory Contract, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (ii) Cure Amounts Related Thereto, dated June 5, 2009 (the "Assignment Notice") as follows:

1. On June 1, 2009, the Debtors commenced these voluntary cases under chapter 11 of title 11 of the United States Code.

2. On June 2, 2009, this Court entered an Order approving the Debtors' bidding procedure [Docket No. 274], which includes a procedure regarding the Debtors' assumption and assignment of executory contracts (the "Procedures Order").

3. On June 9, 2009, Supplier received the Assignment Notice, which states that the Debtors intend to assume and assign all of the Debtors' purchase orders and agreements with Supplier (the "Supplier Agreements") and proposes a cure amount of \$30,803.25 (the "Proposed Cure Amount").

4. The Debtors owe Supplier \$482,562.23 for prepetition goods and/or services provided to the Debtors under the Supplier Agreements (the "Supplier Cure Amount").

5. Thus, there is a difference between the Proposed Cure Amount and the Supplier Cure Amount of \$451,758.98. Attached as Schedule 1 is a listing of invoices evidencing the difference between the Proposed Cure Amount and the Supplier Cure Amount. Copies of the invoices are available upon request.

5. Accordingly, Supplier objects to the Assignment Notice and the Proposed Cure Amount to the extent they do not account for the total prepetition cure amount for purposes of Section 365(b) of the Bankruptcy Code in the amount of \$482,562.23.

WHEREFORE, Creditor requests that the Court enter an order:

(A) Granting Supplier a pre-petition cure amount for purposes of Section 365(b) of the Bankruptcy Code in the total amount of \$482,562.23 as a condition for the Debtors to assume and assign the Supplier Agreements pursuant to the Procedures Order; and

(B) Granting such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Varnum LLP

Dated: June 15, 2009

By: /s/ Mary Kay Shaver
Mary Kay Shaver (P-60411)
Business Address:
Bridgewater Place
P. O. Box 352
Grand Rapids, MI 49501-0352
(616) 336-6000
mkshaver@varnumlaw.com

Doc No. 2712070

SCHEDULE 1

REMIT TO

DUNS#	CUST#	COMPANY NAME	INVOICE#	INVDTE	AMT	CUSTOMER
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289101	18-May-09	\$ 6,586.25	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289120	19-May-09	\$ 9,700.73	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289122	20-May-09	\$ 28,128.50	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289131	20-May-09	\$ 6,586.25	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289133	20-May-09	\$ 16,472.88	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289134	20-May-09	\$ 14,493.91	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289136	20-May-09	\$ 3,418.39	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289143	21-May-09	\$ 4,763.12	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289145	21-May-09	\$ 31,578.41	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289146	21-May-09	\$ 3,418.39	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289149	21-May-09	\$ 963.13	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289154	21-May-09	\$ 13,248.64	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289155	22-May-09	\$ 6,586.25	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289158	25-May-09	\$ 802.10	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289162	26-May-09	\$ 481.57	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289164	26-May-09	\$ 9,955.51	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289165	26-May-09	\$ 7,520.45	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289166	26-May-09	\$ 14,493.91	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289168	26-May-09	\$ 18,147.42	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289174	27-May-09	\$ 481.57	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289175	27-May-09	\$ 13,248.64	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289177	27-May-09	\$ 16,408.26	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289178	27-May-09	\$ 14,493.91	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289179	29-May-09	\$ 6,836.77	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289192	28-May-09	\$ 1,461.97	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289199	28-May-09	\$ 13,248.64	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289201	28-May-09	\$ 15,040.90	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289202	28-May-09	\$ 14,493.91	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289205	27-May-09	\$ 907.37	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289214	29-May-09	\$ 451.53	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289218	29-May-09	\$ 6,586.25	GM
117474668	8300000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289221	29-May-09	\$ 11,595.13	GM
					\$ 312,600.66	

117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289132	20-May-09	\$ 24,479.93	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289150	21-May-09	\$ 16,511.75	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289151	22-May-09	\$ 8,633.95	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289152	25-May-09	\$ 11,321.78	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289163	26-May-09	\$ 14,597.13	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289176	27-May-09	\$ 14,597.13	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289200	28-May-09	\$ 14,597.13	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289207	27-May-09	\$ 4,463.30	GM MEXICO
117474668	8330000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289219	29-May-09	\$ 15,365.40	GM MEXICO
117474668	8331000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289153	21-May-09	\$ 12,355.13	GM MEXICO
117474668	8331000	JLF GLASGOW/AKA NELSON METAL PRODUCTS	289241	29-May-09	\$ 2,235.69	GM MEXICO
					\$ 139,158.32	