

Hearing Date: September 26, 2011 at 9:45 a.m. (Eastern Time)
Objection Deadline: September 12, 2011 at 4:00 p.m. (Eastern Time)

STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA
A PROFESSIONAL CORPORATION
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Counsel for Dean M. Trafelet in his
Capacity as Legal Representative for Future Asbestos
Personal Injury Claimants

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

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)
In re) Chapter 11
)
MOTORS LIQUIDATION COMPANY, *et al.*,) Case No. 09-50026 (REG)
)
f/k/a General Motors Corp., *et al.*)
)
Debtors.) (Jointly Administered)
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**NOTICE OF SUPPLEMENT TO
THIRD INTERIM AND FINAL APPLICATION OF
DEAN M. TRAFELET IN HIS CAPACITY AS LEGAL REPRESENTATIVE FOR
FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE INTERIM PERIOD FROM OCTOBER 1, 2010 THROUGH MARCH 29, 2011,
AND THE FINAL PERIOD FROM NOVEMBER 13, 2009 THROUGH MARCH 29, 2011**

PLEASE TAKE NOTICE that the Third Interim and Final Application of Dean M.
Trafelet in his capacity as Legal Representative for Future Asbestos Personal Injury Claimants
(the “**FCR**”), for Allowance of Compensation and Reimbursement of Expenses Incurred for the
Interim Period from October 1, 2010 through March 29, 2011, and the Final Period from

November 13, 2009 through March 29, 2011 (the “**Application**”) (Docket No. 10247) is supplemented with the revised summary sheet attached hereto (the “**Revised Summary Sheet**”).

PLEASE TAKE FURTHER NOTICE that, as reflected on the Revised Summary Sheet, the FCR is reducing the total fees and expenses requested in the Final Compensation Period¹ to \$213,684.48 in professional fees and \$2,314.50 in expenses, for total final compensation of \$215,998.98. This reduction was made in order to correct a clerical error that resulted in certain previously disallowed fees and expenses being included in the total compensation requested in the Application.

All other amounts requested in the Application remain unchanged and the FCR respectfully requests (i) allowance of compensation for professional services in the amount of \$133,704.75 and reimbursement of expenses in the amount of \$249.06 for total compensation of \$133,953.81 in the Third Interim Compensation Period and (ii) allowance of compensation for professional services in the amount of \$213,684.48 and reimbursement of expenses in the amount of \$2,314.50 for total compensation of \$215,998.98 during the Final Compensation Period.

[signature page to follow]

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

Dated: August 19, 2011
Dallas, Texas

Respectfully submitted,

**STUTZMAN, BROMBERG, ESSERMAN &
PLIFKA, A PROFESSIONAL CORPORATION**

/s/ Sander L. Esserman

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**Counsel for Dean M. Trafelet in his Capacity as the
Legal Representative for Future Asbestos Personal
Injury Claimants**

**REVISED SUMMARY COVERSHEET TO THE THIRD INTERIM AND FINAL
APPLICATION OF DEAN M. TRAFELET IN HIS CAPACITY AS LEGAL
REPRESENTATIVE FOR FUTURE ASBESTOS PERSONAL INJURY CLAIMANTS**

NAME OF APPLICANT:	Dean M. Trafelet, Legal Representative for Future Asbestos Personal Injury Claimants
DATE OF ORDER OF APPOINTMENT:	April 8, 2010
EFFECTIVE DATE OF APPOINTMENT:	November 13, 2009
PERIODS FOR WHICH COMPENSATION AND REIMBURSEMENT IS SOUGHT:	October 1, 2010 through March 29, 2011 (Third Interim Compensation Period)
	November 13, 2009 through March 29, 2011 (Final Compensation Period)
TOTAL PROFESSIONAL FEES SOUGHT IN THE THIRD INTERIM APPLICATION:	\$133,704.75
TOTAL PROFESSIONAL FEES SOUGHT IN THE FINAL APPLICATION:	\$213,684.48
TOTAL EXPENSES SOUGHT IN THE THIRD INTERIM APPLICATION:	\$249.06
TOTAL EXPENSES SOUGHT IN THE FINAL APPLICATION:	\$2,314.50
TOTAL COMPENSATION SOUGHT IN THE THIRD INTERIM APPLICATION (FEES AND EXPENSES):	\$133,953.81
TOTAL COMPENSATION SOUGHT IN THE FINAL APPLICATION (FEES AND EXPENSES):	\$215,998.98
TOTAL PROFESSIONAL HOURS IN THE THIRD INTERIM APPLICATION:	168.75
TOTAL PROFESSIONAL HOURS IN THE FINAL APPLICATION:	272.05
HOURLY RATES:	\$785.00 (2009, 2010)
	\$800.00 (2011)

INTERIM OR FINAL APPLICATION:

This is Applicant's third interim and final application for compensation.

SUMMARY OF PRIOR APPLICATIONS

Date Application Filed	Docket No.	Compensation Period	Fees Requested	Expenses Requested	Fees Allowed	Expenses Allowed	Holdback (if any)
7/15/2010	6350	Nov. 13, 2009 – May 31, 2010	\$38,936.00	\$2,050.61	\$37,942.98	\$1,969.69	\$3,794.30
11/15/2010	7747	June 1, 2010 – September 30, 2010	\$42,036.75	\$95.75	\$42,036.75	\$95.75	\$4,203.68

**SUMMARY OF HOURS BILLED DURING
THE THIRD INTERIM COMPENSATION PERIOD**

Professional	Year Licensed to Practice Law	Year	Hourly Billing Rate	Total Hours Billed	Total Fees
Traflet, Dean M.	Illinois - 1969	2010	\$785.00	168.75	\$133,704.50
		2011	\$800.00		

**SUMMARY OF HOURS BILLED DURING
THE FINAL COMPENSATION PERIOD**

Professional	Year Licensed to Practice Law	Year	Hourly Billing Rate	Total Hours Billed	Total Fees
Trafelet, Dean M.	Illinois - 1969	2009	\$785.00	272.05	\$214,677.50
		2010	\$785.00		
		2011	\$800.00		
Less Agreed Reductions Taken in Prior Application Periods					(993.02)
Grand Total					\$213,684.48