

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK (MANHATTAN)

_____	)	In Proceedings for a Reorganization
	)	Under Chapter 11
IN RE:	)	
	)	Case No. 09-50026-reg
GENERAL MOTORS CORPORATION	)	
	)	Honorable Robert E. Gerber
Debtor	)	
_____	)	

**VERIFIED MOTION FOR ADMISSION *PRO HAC VICE***

Thomas M. Wilson, a member of the bar of the State of New York and the State of Ohio, for his Verified Motion for Admission *Pro Hac Vice* to the Bankruptcy Court for the Southern District of New York to represent Kelley & Ferraro LLP in the above-captioned bankruptcy proceeding, states as follows:

1. Thomas M. Wilson is a member of Kelley & Ferraro LLP, located at 2200 Key Tower, 127 Public Square, Cleveland, Ohio 44114. His office telephone number is (216) 575-0777.
2. Mr. Wilson is admitted to practice law in the state of New York (2009) and the State of Ohio (1987).
3. Mr. Wilson has never been denied admission in the Bankruptcy Court for the Southern District of New York.

WHEREFORE, Mr. Wilson respectfully requests this Court admit his *pro hac vice* to practice law in the United States Bankruptcy Court for the Southern District of New York in this bankruptcy proceeding.

KELLEY & FERRARO, LLP

By /s/ Thomas M. Wilson  
Thomas M. Wilson  
2200 Key Tower-127 Public Square  
Cleveland, Ohio 44114  
(216) 575-0777  
Fax: (216) 575-0799  
[twilson@kelley-ferraro.com](mailto:twilson@kelley-ferraro.com)

**VERIFICATION**

Thomas M. Wilson, being first duly sworn, deposes and says that I have read the above Motion for Admission *Pro Hac Vice*, and the statements contained therein are true to the best of my knowledge, information and belief.

/s/ Thomas M. Wilson  
Thomas M. Wilson (0038933)

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_____	)	

**ORDER FOR ADMISSION PRO HAC VICE**

The court, having reviewed the Verified Motion for Admission *Pro Hac Vice* of Thomas M. Wilson, and being otherwise duly advised in the premises:

IT IS HEREBY ORDERED that the *Pro Hac Vice* admission of Thomas M. Wilson be granted, permitting the same to practice before the United States Bankruptcy Court, Southern District of New York for the purposes of the above referenced bankruptcy proceeding, only.

Dated: \_\_\_\_\_, 2009

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

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_____	)	

**PROOF OF SERVICE**

The undersigned certifies that on June 1, 2009, a copy of the Verified Motion for Admission *Pro Hac Vice*, and proposed Order for Admission *Pro Hac Vice* were served upon the following parties electronically.

Stephen Karotkin  
[Theodore.tsekerides@weil.com](mailto:Theodore.tsekerides@weil.com)

/s/ Thomas M. Wilson  
Thomas M. Wilson (0038933)  
Kelley & Ferraro LLP  
2200 Key Tower  
127 Public Square  
Cleveland, OH 44114