

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

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**In re**

**MOTORS LIQUIDATION COMPANY, et al  
f/k/a General Motors Corp., et al,**

**Debtors.**

**Chapter 11 Case No.  
09-50026 (REG)**

**(Jointly Administered)**

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**MOTION FOR RECONSIDERATION/REHEARING OF OFFER**

Comes now Jake W. Rodd, a Designated Claimant, and enters this Motion For Reconsideration/Rehearing of Offer, and as reason therefore says as follows:

1. He has received a "Stipulation and Settlement Resolving Claim No. 6916", settling his \$500,000.00 claim for \$5,000.00, which he has been instructed by Attorney Smolinsky to sign.
2. The Claimant has received no Order from this Court to substantiate his signing any settlement of his claim.
3. The Claimant was advised by Attorney Smolinsky that the Court set aside the Mediation Order, which Order the Claimant has not received.
4. The Claimant's initial Cap Letter was in the amount of a \$500,000.00 demand, which he understood would be Mediated.
5. As a result of the accident for which the Claimant seeks damages,

the Claimant has received from Dr. Garcia a 32%/17% impairment rating, and \$5,000.00 is an unconscionable amount for the Claimant to accept.

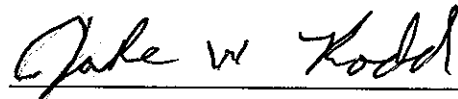
6. It is the Claimant's assertion that Attorney Smolinsky has not been forthcoming with information concerning the bankruptcy case, and has given him erroneous information.

7. The Claimant requests the Court to send him the information/paper work which Ordered his claim to be worth \$5,000.00 as opposed to an actual settlement offer. Should the Court have any questions concerning the details of the Claimant's accident, it can be viewed at Google.

8. The Claimant has previously presented to the Court Dr. Thomas Abbey's Narrative Report, dated December 14, 2005, outlining his diagnosis and prognosis. Dr. Abbey, of the North Florida Medical Associates, Inc., Jacksonville, Florida, has given me a 30-32% impairment rating according to the American Medical Association's "Guide To the Evaluation of Permanent Impairment." Dr. Javier Garcia-Bengochea's opinion that I may have suffered an aggravation as a result of my fall at the tailgate of my truck, and his Permanent Impairment rating of twelve percent based on the Florida Impairment Rating guide has also been furnished to the Court. An X-ray dated June 14, 2005, of the neck fusion done to my neck by Dr. Javier Garcia-Bengochea was also furnished to the Court.

WHEREFORE, the Claimant requests the Court as follows:

1. In Lieu of General Motors actions in the matter of my claim, I request a Reconsideration/Rehearing of my Settlement by the Honorable Robert E. Gerber, United States Bankruptcy Court Judge;
2. To furnish the Claimant with all paperwork pertinent to the decision for the settlement to be \$5,000.00;
3. Such other and further relief as the Court deems just and equitable in the premises.

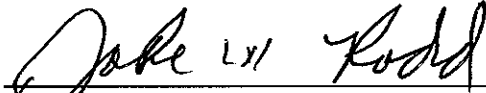


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JAKE W. RODD  
111 E. 1<sup>st</sup> St. #26  
Jacksonville, Florida 32206  
(904) 418-1907

I HEREBY CERTIFY that a copy of the foregoing has been furnished to HONORABLE ROBERT E. GERBER, United States Bankruptcy Judge, Room 621, United States Bankruptcy Court Southern District N.Y., One Bowling Green, New York, New York, 10004, to WEIL, GOTSHAL & MANGES LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, New York, 10153, (Attn: Joseph H. Smolinsky, Esq.), Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan, 48243 (Attn: Ted Stenger), General Motors, LLC, 300 Renaissance Center, Detroit Michigan, 48265 (Attn: Lawrence S. Buonomo, Esq.), Cadwalader, Wickersham & Taft LLP, One World Financial Center, New York, New York, 10281 (Attn: John J. Rapisardi, Esq.), United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D. C. 20220, (Attn: Joseph Samarias, Esq.), Vedder Price, P. C., 1633 Broadway, 47<sup>th</sup> Floor, New York, New York, 10019 (Attn: Michael J. Edelman, Esq.), Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York, 10036, (Attn: Thomas Moers Mayer, Esq.), Office of the United States Trustee for the Southern District of

New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.) And U. S. Attorney's Office, S. D. N. Y., 86 Chambers Street, Third Floor, New York, New York, 10007 (Attn: David S. Jones, Esq.), Honorable Joseph Biden, Vice President of the United States of America, Washington, D. C., and Barrack Obama, President of the United States of America, Washington, D. C., by United States Mail Delivery, this 20 day of October, 2011, A. D.

A handwritten signature in cursive script that reads "Jake W. Rodd". The signature is written in black ink and is positioned above a horizontal line.

Jake W. Rodd

111 East 1<sup>st</sup> St. #26

Jacksonville, Florida 32206