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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK, CHAPTER 11

DEBORAH PARKER/CATHERINE 5241 GARDENDALE AVENUE N.E. CANTON, OHIO 44714 CASE NO: 09-50026 (REG)

DISPUTED CLASS ACTION SETTLEMENT DEATH LIABIBLITY OF FRANK WILLIAMS

V.

MOTORS LIQUIDATION COMPANY, ET, AL f/k/s General Motors Corp., et al.

(Jointly administered)

Now comes the Plaintiff's, Deborah Parker and Catherine Clark filing motion

Disputing Class Action Settlement because Death Liability of the death of Frank

Williams A death certificate for Frank Williams was filed before barring any claims. The
attorney's have deliberately refused to submit a claim number on behalf of the Plaintiff
because they refused there representation in this class action settlement. Mr. Frank

Williams died from lung cancer, and a death certificate was submitted in May of
2011 before barring this claim from successors of family members.

On November 3, 2011 the Plaintiff, Deborah Parker contacted attorney Edward

Wu concerning documents of (the Confirmation Order") (ECF No. 9941) confirming the

Debtors' Second Amended Joint Chapter 11 Plan, and ECF No. 9836 (the "Plan), signed

The Honorable Judge Robert E. Gerber, United States Bankruptcy Judge, and entered by

Clerk of the United States Bankruptcy Court for the Southern District of New York (the

"Bankruptcy") on March 11, 2011. These documents were a "Court Order" ordered

by the Honorable Judge Robert E. Gerber. Exhibit's and Documents have not been

sent completely to the Plaintiff's. Their has not been a direct percentage of what the

Plaintiff's will received from the Trust therefore the Plaintiff's are filing because attorney

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David Griffin and Edward Wu filed to provide forms for the Plaintiff's which was brought out by Edward Wu a couple weeks ago.

A death certificate was presented to this court in May of 2011, however, this

Court failed to acknowledge the Plaintiffs acknowledgement of being successors

in Mr. Frank Williams Asbestoses claims. Therefore the claims are disputing settlement
claims in this class action lawsuit.

The Plaintiff's believe they we shown disparate treatment because they refused to allow attorney David Griffin and Mr. Edward Wu to represent them in the class action suit.

Distributed by Defendant's in the amount claim.

Therefore, the Plaintiff's has contacted attorney Jerome Hossler to represent Plaintiff's to protect their rights in this settlement.

Therefore, the Plaintiff's move this Court to expedite all exhibits and documents related to the claim Case No: 09-50026 with General Motors, Liquidation Company, and forms for the processing of a claim number for the Plaintiff's. Which attorney Edward Wu informed Plaintiff, Deborah Parker of last week.

The asbestoses claim is of the Plaintiff's biggest concern because Mr. Frank Williams was an employee for over 20 years and died with lung cancer, a death certificate has already been submitted to this Court.

We pray the Honorable Judge Robert E. Gerber contact the Plaintiff's concerning the issues presented. The claims forms should be submitted to the Plaintiff's for Page 3

percentage of settlement and distribution before December 1, 2011, before	
distribution of settlement on December 15, 2011	Attached barring notice.
Respectfully submitted,	
Signed by: Deborah Parker:	Date: November 25, 2011

Catherine Clark

## **CERTIFICATE OF MAILING**

Date: November 25, 2011

SOUTHERN DISTRICT OF NEW YORK	_	
In re	1 :	Chapter 11 Case No.
ж іс	ì	Cuaper Ix Case 1101
MOTORS LIQUIDATION COMPANY	:	09-50026 (REG)
I/k/a GENERAL MOTORS CORPORATION,	:	
et al.,	•	
Debtors.	:	(Jointly Administered)
Deptors.	:	(John Ly Administrator)
	X	

# NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM (INCLUDING CLAIMS UNDER SECTION 503(BM)) OF THE BANKRUPTCY CODE)

TO ALL PERSONS AND ENTITIES WITH CLAIMS (INCLUDING CLAIMS UNDER SECTION 503(B)(9) OF THE BANKRUPTCY CODE) AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tux Identification Number	Other Names Used by Dehtorn in the Part 8 Years
Motors Liquidation Company (7k/a General Motors Corporation)	09-50026	38-0572515	General Motors Corporation GMC Truck Division NAO Flect Operations GM Corporation-GM Auction Department National Car Rental National Car Rental National Car Rental Automotive Market Research
MLCS, LLC (Pk/a Swturm, LLC)	09-50027	38-2577506	Sature, LLC Saturn Corporation Saturn Motor Car Corporation GM Saturn Corporation Saturn Corporation of Delaware
MLCS Distribution Corporation (I/k/a Satura Distribution Corporation)	09-50028	38-2755764	Saturn Distribution Corporation
MLC of Harlem, Inc. (Ck/a Chevrolet-Saturn of Harlem, Inc.)	09-13558	20-1426707	Chevroket-Saturn of Harlem, Inc. CKS of Harlem

PLEASE TAKE NOTICE THAT, on September 16, 2009, the United States Bankruptey Court for the Southern District of New York (the "Court"), having jurisdiction over the chapter 11 cases of Motors Liquidation Company (West Concern Motors Corporation) and its efficiency of the State of New York (the "Court"), he "Debtors") entered an order (the "Bar Date Order") establishing (of November 30, 2009, at 5500 p.m. (Eastern Time) as the fast and time for each person or eatily (including, Movember 30, 2009, at 5500 p.m. (Eastern Time) as the fast and time for each person or eatily (including, station under section 503(b)(9) of the file a proof of claim") hased on propertion claims, louding a claim under section 503(b)(9) of the Bankruptey Code, as described more fully below (a "503(b)(9) Claim"), against any of the Debtors (the "General Bar Date"), and (ii) November 30, 2009, at 5:00 p.m. (Eastern Time) as the last date and time for each governmental Bar Date" in the State of t

The Bar Date Order, the Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the Debtors (other than those set forth below as being specifically excluded) that arose prior to June 1, 2009, the date on which the Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the "Bankruptey Code").

If you have any questions relating to this Notice, please feel free to contact AlixPartners at 1-800-414-9607 or by count at chins@motortiquidation.com. In addition, you may contact the Official Committee of Unsecured. Creditors through its website at www.motoryliquidation.creditors.committee.com or at 1-212-715-3275.

YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.

#### WHO MUST FILE A PROOF OF CLAIM

You MUST file a Proof of Claim to vote on a chapter 11 plan filed by the Debtors or to share in any of the Debtors' catales if you have a claim that arece prior to Jane 1, 2009, including a SO(D(X)) Claim, and it is not one of the other types of claims described in Section 2 below. Acts or omissions of the Debtors that arose before Jane 1, 2009 may give rise to claims against the Debtors that most be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or extrain prior to Jane 1, 2009.

Pursuant to section 101(3) of the Bankruptcy Code and as used in this Notice, the word "claim" rueans: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, miliquidated, fixed, contingent, numbered, turnatured, dispated, nudsiputed, legal, equiputed, legal, equiputed, legal, equiputed, legal, equiputed, secured, or unsecured, or (b) a right to an equitable remody for broach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remody is reduced to judgment, fixed, contingent, matured, unmentured, dispated, undispated, secured, or unsecured. Further, claims include unsecured claims, secured claims, priority claims, and 503(b)(9) Claims (as defined in Section 2(d) below).

### WHO NEED NOT FILE A PROOF OF CLAIM

You need not file a Proof of Claim if:

- (a) Your claim is listed on the Schechales (as defined below) and (i) is not described in the Schechales as "disputed," "contingent," or "unliquidated," (ii) you do not not be amount or nature of the claim set forth in the Schedules, and (iii) you do not dispute that the claim is an obligation of the specific Debtor against which the claim is listed on the Schedules.
- (b) Your claim has been paid in full;
- (e) You hold an interest in any of the Debtors, which interest is based exclusively upon the ownership of common or preferred stock, membership interests, perturership interests, or warrants or rights to purchase, sell or subscribe to such a security or interest, provided, however, that interest holders who wish to assert claims (as opposed to ownership interests) against any of the Debtors that strise out of or relate to the ownership or purchase of an interest, including claims arising out of or relating to the sale, issance, or distribution of the interest, must file Proofs of Claim on or before the applicable Bar Date, unless another exception identified herein applies.
- (d) You bold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative claim; provided, however, 503(b)(9) Claims are subject to the General Ber Date as provided above. Section 503(b)(9) provides in part: "...there shall be allowed administrative expenses...including...(b) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor 3 business." Accordingly, if you have a 503(b)(9) Claim, you must file a Proof of Claim on or before the General Bar Date;
- (e) You hold a claim that has been allowed by an order of the Court entered on or before the applicable for Date.
- (f) You hold a claim against any of the Debtors for which a separate deadline is fixed by the Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (g) You are a Debtor in these cases having a claim against another Debtor,
- You are an affiliate (as defined in section 101(2) of the Bankruptcy Code) of any Debtor as of the Bar Date;

- You hold a claim for which you have already properly filed a Proof of Claim against any of the Debtors with the Clerk of the Count or The Garden City Group, Inc., the Debtors' claims agent, utilizing a claim form that substantially conforms to the Proof of Claim Form (as defined below) or Official Form 10; or
- You hold a claim that is limited exclusively to the repayment of principal, interest and other foce and expenses on or under any agreements (a "Debt Claim") governing any dost excurity issued by any of the Debtors pursuant to an indeature (together, the "Debt Instruments") if the indeature trustee or similar fiduciary under the applicable indeature or fiscal and paying agency agreement filter a Proof of Ckim against the applicable Debtor, on or before the Bar Dale, on excount of all Debt Ckims against such Debtor under the applicable Debt restuments, provided, however, that my holder of a Debt Ckim withing to a neser a claim arising out of or relating to a Debt Instrument, other than a Debt Ckim, shall be required to file a Proof of Claim with respect to such claim on or before the Bar Date, unless another exception identified herein applies. Debt Instruments include those agreements listed at the end of this Notice.

#### YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS.

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.

#### EXECUTORY CONTRACTS AND UNEXPIRED LEASES

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable Bar Date, and (ii) the date which is thirty days following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foreyoning, if was an eaparty on executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of June 1, 2009 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable Bar Date unless an exception identified above applies.

#### WHEN AND WHERE TO FILE

All Proofs of Claim must be filed so as to be actually received on or before the applicable Bar Date at the following

If by overnight courier or hand delivery to:

If by first-class mail, to: The Garden City Group, Inc.

Atha: Motors Liquidation Company Claims Processing
515 Hazer Parkway, Suite A

Dublin, Ohio 43017

The Garden City Group, Inc.

Ath: Motors Liquidation Company Claims Processing
P.O. Box 9386

Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptey Court, SDNY One Bowling Green Room 534 New York, New York 10004

Proofs of Claim will be deemed timely filed only if <u>setually received</u> by The Garden City Group, Inc. or the Court on or before the applicable Bar Date. Proofs of Claim may <u>not</u> be delivered by facsimile, telecopy, or electronic mail transmission.

#### 5. WHAT TO FILE

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language, (ii) be denominated in lawful curroxy of the United States, (iii) conform substantially to the form provided with this Notice ("Proof of Claim Form") or Official Beakruptcy Form No. 10, (iv) state the Debtor against which it is filed, (v) set forth with specificity the legal and focusul basis for the alleged claim, (vi) include supporting documentation or an explanation as to why such documentation is not available, and (vii) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE DEBTOR, SEPARATE PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC DEBTOR AGAINST WHICH YOU'R CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT DEBTOR'S BANKRUPTCY CASE. A LIST OF THE NAMES OF THE DEBTORS AND THEIR CASE NUMBERS IS SET FORTH ABOVE.

Additional Proof of Claim Forms may be obtained at www.uscourts.gov/bkforms/ or www.motorsliquidation.com.

YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.

### CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE

Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wristes to assert against each of the Debtors, will be forewr burred—that is, forbidden—from asserting the claim against each of the Debtors and their respective statest (or filing a Proof of Claim with respect to the claim), and each of the Debtors and their respective chapter 11 estates, successors, and property will be forewer discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to well accept or reject my chapter 11 plan filed in these chapter 11 cases, participate in my distribution in any of the Debtors' chapter 11 cases.

#### THE DEBTORS' SCHEDULES, ACCESS THERETO, AND CONSEQUENCES OF AMENDMENT THEREOF

You may be listed as the holder of a claim against one or more of the Debtors in the Debtors' Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the "Schedules"). If you rely on the Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules.

As set forth above, if you agree with the classification and amount of your claim as listed in the Debtors' Schedules, and if you do not dispute that your claim is only against the specified Debtor, and if your claim is not described as "disputed", "contingent", or "unliquidated", you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Schedules may be examined by interested parties on the Court's electronic docket for the Debtors' chapter 11 cases, which is posted on the Internet at <a href="https://www.motoralignidation.com">www.mysbuscourcs.gov</a> (a PACER login and password are required and can be obtained through the PACER Service Center at <a href="https://www.mysbuscourcs.gov">www.mysbuscourcs.gov</a>. Copies of the Schedules may also be examined by interested parties between the hours of 9.000 am. and 43 bp. m. (Bestern Time) at the office of the Clerk of the Bankruptery Court, United States Bankruptery Court for the Southern District of New York, One Bowling Green, Room 511, New York, New York (1004. Copies of the Debtors' Schedules may also be obtained by written request to the Debtors' claims agent at the address and telephone number set forth below:

The Garden City Group, Inc. Attn: Motors Liquidation Company P.O. Box 9386 Dublin, Ohio 43017-4286 1-703-286-6401 In the event that the Debtors amend their Schedules to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the emount of a claim reflected therein, (c) change the classification of a claim reflected therein, (d) add a claim that was not listed on the Schedules, the Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable Ber Dete and (b) the date that is thirty days after the Debtors provide notice of the amendment.

A holder of a possible claim sgainst the Debtors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.

DATED: September 16, 2009 New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND DEBTORS IN POSSESSION

### Certain Debt Instruments

<u> </u>	Debt Instrument	CUSIP, ISIN, or Swiss Security Numbers
Ľ	Indenture, dated as of Nov. 15, 1990, between GM and Citibank as indenture trustee	CUSIP Nos. 370442AN5, 370442AJ4, 370442AR6, 37045EAG3, 37045EAS7
2	Indenture, dated as of Dec. 7, 1995, between GM and Citibank as indenture trustee	CUSP Nos. 370442A72, 370442A10; 370442AV7, 370442A28, 370442B80, 370442B16, 370442774, 370442766, 37044278, 370442711, 370442733, 370442725, 370442BQ7, 370442B11, 370442B17, 370442BW4, 370442B3, 370442C1, 370442691
3	Trust Indenture, dated as of July 1, 1995, between Michigan Strategic Fund and Dai-Ichi Kangyo Trust Company of New York (538,800,000 Multi-Modal Interchangeable Rate Pollution Control Refunding Revenue Bonds)	CUSIP No. 594693AQ6
4	Indenture of Trust, dated as of July 1, 1994, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$12,500,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AA2
5	Indenture of Trust, dated as of July 1, 1999, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$10,000,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449ABO
6	Trust Indenture, dated as of Dec. 1, 2002, among City of Fort Wayne, Indiana, JPMorgan Chase Bank and Bank One Trust Company, N.A., (\$31,000,000 Pollution Control Revenue Refunding Bonds)	CUSIP No. 455329AB8
7	Trust Indenture, dated as of Mar. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (320,040,000 State of Ohio Pollution Control Refunding Revenue Bonds)	CUSTP No. 667396AU2
8	Indenture of Trust, dated as of Dec. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$46,000,000 State of Ohio Solid Waste Revenue Bonds)	CUSIP No. 67759ABC2
9	Trust indenture, dated as of Apr. 1, 1984, among City of Indianapolis, Indiana, Bankers Trust Company and The Indiana National Bank (\$1,400,000 Pollution Control Revenue Bonds)	CUSIP No. 455329AB8

In the event that the Debtors amend their Schechiles to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the amount of a claim reflected therein, (c) change the classification of a claim reflected therein, (c) and a claim that was not listed on the Schechiles, the Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable Bar Date and (b) the date that is thirty days after the Debtors provide notice of the amendment.

A holder of a possible craim against the Debiors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.

DATED: September 16, 2009 New York, New York BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

ATTORNEYS FOR DEBTORS AND DEBTORS IN POSSESSION

### Certain Debt Instruments

	Debt Instrument	CUSIP, ISIN, or Swiss Security Numbers
1	Indenture, dated as of Nov. 15, 1990, between GM and Citibank as indenture trustee	CUSIP Nos. 370442AN5, 370442A14, 370442AR6, 37045EAG3, 37045EAS7
2	Indenture, dated as of Dec. 7, 1995, between GM and Citibank as indenture trustee	CUSIP Nes. 370442A712, 370442A103, 370442A74, 370442A78, 370442B190, 370442B16, 370442774, 570442766, 370442758, 370442741, 570442733, 370442725, 370442BQ7, 370442B11, 370442F17, 370442BW4, 370442B32, 370442E13, 370442E91
3	Trust Indenture, dated as of July 1, 1995, between Michigan Strategic Fund and Dai-Ichi Kangyo Trust Company of New York (358, 800,000 Molit-Modal Interchangeable Rate Pollution Control Refunding Revenue Bonds)	CUSTP No. 594693AQ6
4	Indenture of Trust, dated as of July 1, 1994, between City of Moraine, Ohio and Dai-Iehi Kangyo Trust Company of New York (\$12,500,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AA2
5	Indenture of Trust, dated as of July 1, 1999, between City of Moraine, Ohio and Dai-Ichi Kangyo Trust Company of New York (\$10,000,000 Solid Waste Disposal Revenue Bonds)	CUSIP No. 616449AB0
6	Trust Indenture, dated as of Dec. 1, 2002, among City of Fort Wayne, Indiana, JP:Morgan Chase Bank and Bank One Trust Company, N.A., (331,000,000 Pollution Control Revenue Refunding Bonds)	CUSIP No. 455329AB8
7	Trust Indenture, dated as of Mar. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$20,940,000 State of Ohio Pollution Control Refunding Revenue Bonds)	CUSIP No. 667596AU2
8	Indonture of Trust, dated as of Doc. 1, 2002, between Ohio Water Development Authority and JPMorgan Chase Bank (\$46,000,000 State of Ohio Solid Waste Revenue Bonds)	CUSIP No. 67759ABC2
9	Trust Indenture, dated as of Apr. 1, 1984, among City of Indianspolis, indians, Bankers Trust Compeny and The Indians National Bank (\$1,400,000 Pollution Control Revenue Bonds)	CUSIP No. 455329AB8

10	Fiscal and Paying Agency Agreement, dated as of July 3, 2003, between GM, Deutsche Bank AG London, as fiscal agent and paying agent, and Benque Générale du Luxembourg S.A., as paying agent	JSIN Nos. XS0171942757, XS0171943649
11	Fiscal and Paying Agency Agreement, dated as of July 10, 2003, between GM Nova Scotia Finance Company, GM, as guarantor, Doutsche Bank Luxembourg S.A., as fiscal agent and paying agent, and Banque Généralo du Luxembourg S.A., as psying agent	ISIN Nos. XS0171922643, XS0171908063.
12	Bond Purchase and Paying Agency Agreement dated May 28, 1986 between GM and Credit Suisse	Swiss Security No. 876 926