

Hearing Date and Time: February 28, 2012 at 9:45 a.m.
Objection Date and Time: February 16, 2012 at 4:00 p.m.

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Counsel for Counsel for Aurelius Capital Management, LP

**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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**AURELIUS CAPITAL MANAGEMENT, LP'S
OBJECTION TO FILING OF COMPLAINT**

Aurelius Capital Management, LP, on behalf of its managed entities, (“**Aurelius**”), by and through its counsel Greenberg Traurig, LLP, hereby submits this Objection (the “**Objection**”) to the *Motion of Motors Liquidation Company GUC Trust Pursuant To 11 U.S.C. § 107(b) And Fed. R. Bankr. P. 9018 For An Order Authorizing Filing Of Complaint Under Seal*, dated January 17, 2012 (the “**Sealing Motion**”) [Docket No. 11315] filed by the Motors Liquidation Company GUC Trust (the “**GUC Trust**”) to the extent that the complaint contains allegations which violate the terms of the Agreed Protective Order entered by this Court on April

7, 2011 [Docket No. 10059]. The dispute regarding the violation of the Agreed Protective Order has been submitted to the Court pursuant to Local Rule 7007-1(b). This Objection to the Sealing Motion has been filed to preserve all rights and remedies held by Aurelius in connection with the violation of the Agreed Protective Order.

Aurelius respectfully requests the Court to enter an Order prohibiting Plaintiff GUC Trust from filing its complaint to the extent the complaint contains allegations which violate the terms of the Agreed Protective Order, and grant Aurelius such further relief as just and proper.

Dated: New York, New York
February 16, 2012

GREENBERG TRAURIG, LLP

By: /s/ Bruce R. Zirinsky

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