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If you have a question regarding whether a particular matter listed herein will go forward, please contact Weil, Gotshal & Manges LLP, attorneys for the Motors Liquidation Company GUC Trust (Attn: Edward Wu; edward.wu@weil.com; (212) 310-8322).

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

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In re : **Chapter 11 Case No.**
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MOTORS LIQUIDATION COMPANY, et al., : **09-50026 (REG)**
f/k/a General Motors Corp., et al. :
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Debtors. : **(Jointly Administered)**
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**NOTICE OF MATTERS SCHEDULED FOR HEARING
ON FEBRUARY 28, 2012 AT 9:45 A.M. (EASTERN TIME)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling Green, New York, NY 10004-1408

I. CONTESTED MATTERS

1. Motion of Wilmington Trust Company, (I) as GUC Trust Administrator, to (A) Liquidate New GM Securities for the Purpose of Funding Fees, Costs and Expenses of the GUC Trust and the Avoidance Action Trust, and (B) Transfer New GM Securities to the Avoidance Action Trust for the Purpose of Funding Future Tax Liabilities, and (II) as Avoidance Action Trust Administrator, to Approve an Amendment to the Avoidance Action Trust Agreement (**ECF No. 11330**)

Responses Filed:

- A. Limited Objection of Green Hunt Wedlake, Inc., Trustee of General Motors Nova Scotia Finance Company, to Motion of Wilmington Trust Company, (I) as GUC Trust Administrator, to (A) Liquidate New GM Securities for the Purpose of Funding Fees, Costs and Expenses of the GUC Trust and the Avoidance Action Trust, and (B) Transfer New GM Securities to the Avoidance Action Trust for the Purpose of Funding Future Tax Liabilities, and (II) as Avoidance Action Trust Administrator, to Approve an Amendment to the Avoidance Action Trust Agreement (**ECF No. 11369**)

- B. Objection Of Certain Noteholders Of General Motors Nova Scotia Finance Company To Motion Of Wilmington Trust Company, (I) As GUC Trust Administrator, To (A) Liquidate New GM Securities For The Purpose Of Funding Fees, Costs And Expenses Of The GUC Trust And The Avoidance Action Trust, And (B) Transfer New GM Securities To The Avoidance Action Trust For The Purpose Of Funding Future Tax Liabilities, And (II) As Avoidance Action Trust Administrator, To Approve An Amendment To The Avoidance Action Trust Agreement (**ECF No. 11370**)
- C. Limited Objection of the State of New York to Wilmington Trust Company's Motion (I) (A) to Liquidate New GM Securities for the Purpose of Funding Fees, Costs and Expenses of the GUC Trust and the Avoidance Action Trust, and (I) (B) Transfer New GM Securities to the Avoidance Action Trust for the Purpose of Funding Future Tax Liabilities; and (II) as Avoidance Action Trust Administrator, to Approve an Amendment to the Avoidance Action Trust Agreement (**ECF No. 11433**)

Replies Filed:

- D. Reply Brief in Support of the Motion of Wilmington Trust Company, (I) as GUC Trust Administrator, to Liquidate New GM Securities for the Purpose of Funding Fees, Costs and Expenses of the GUC Trust and the Avoidance Action Trust, and (II) as Avoidance Action Trust Administrator, to Approve an Amendment to the Avoidance Action Trust Agreement (**ECF No. 11439**)

Additional Documents: None to date.

Status: This matter is going forward.

- 2. Motion of Motors Liquidation Company GUC Trust Pursuant to 11 U.S.C. Section 107(b) and Fed. R. Bankr. P. 9018 for an Order Authorizing Filing of Complaint Under Seal (**ECF No. 11315**)

Responses Filed:

- A. Response of Green Hunt Wedlake, Inc., Trustee of General Motors Nova Scotia Finance Company, Regarding Motion to File Under Seal Motion of Motors Liquidation Company GUC Trust Pursuant to 11 U.S.C. Section 107(b) and Fed. R. Bankr. P. 9018 for an Order Authorizing Filing of Complaint Under Seal (**ECF No. 11418**)
- B. Response of Certain Noteholders of General Motors Nova Scotia Finance Company to Motion to File Under Seal Motion of Motors Liquidation Company GUC for an Order Authorizing Filing of Complaint Under Seal (**ECF No. 11422**)
- C. Aurelius Capital Management, LP's Objection to Filing of Complaint (**ECF No. 11423**)

- D. Response by General Motors LLC 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 the filing of the Complaint Under Seal; Cross Motion to Intervene in the Adversary Proceeding (**ECF No. 11412**)

Replies Filed:

- E. Reply in Connection with 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 (**ECF No. 11438**)

Additional Documents: None to date.

Status: This matter is going forward.

II. STATUS CONFERENCE

1. Official Committee of Unsecured Creditors' First Amended Objection to Claims filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief (**ECF No. 7859**)

Responses Filed:

- A. Response of Certain Noteholders in Opposition to Official Committee of Unsecured Creditors' First Amended Objection to Claims filed by Green Hunt Wedlake, Inc., and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief (**ECF No. 8084**)
- B. Initial Response and Reservation of Rights of Certain Noteholders of General Motors Nova Scotia Finance to the official Committee of Unsecured Creditors' First Amended Objection to their Claims, and Joinder to Response of Noteholders Represented by Greenberg Traurig, LLP (**ECF No. 8104**)
- C. Response by General Motors LLC to the Official Committee of Unsecured Creditors' First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief filed by Arthur Jay Steinberg on behalf of General Motors LLC. (**ECF No. 8073**)
- D. Response to Motion Response of Green Hunt Wedlake, Inc., Trustee of General Motors Nova Scotia Finance Company, to Official Committee of Unsecured Creditors' First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief filed by Philip Dublin on behalf of Green Hunt Wedlake, Inc., Trustee (**ECF No. 8088**)

- E. Joinder of Citigroup Global Markets Inc. to Response of Certain Noteholders in Opposition to Official Committee of Unsecured Creditors First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc., and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief (**ECF No. 8118**)
- F. Joinder And Reservation Of Rights Of Morgan Stanley & Co. International PLC to Response of Certain Noteholders in Opposition to Official Committee of Unsecured Creditors' First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief (**ECF No. 8160**)

Replies Filed: None to date.

Additional Documents:

- G. Joint Status Report (**ECF No. 11060**)
- H. Transcript of status conference held on October 28, 2011 (**ECF No. 11105**)
- I. Letter to Judge Gerber dated February 16, 2012 requesting a conference to discuss a discovery dispute, sent by Aurelius Capital (**Not Docketed**) (the "**Aurelius Letter**")
- J. Letter to Judge Gerber dated February 23, 2012, responding to the Aurelius Letter, sent by the Motors Liquidation GUC Trust (**Not Docketed**)

Status: A status conference on this matter is going forward, including a conference on the discovery dispute referenced in the Aurelius Letter.

Dated: New York, New York
February 24, 2012

/s/ Joseph H. Smolinsky
Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

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