

HEARING DATE AND TIME: April 26, 2012 at 9:45 a.m. (Eastern Time)

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Company GUC Trust

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

-----X	
In re	: Chapter 11 Case No.
	:
MOTORS LIQUIDATION COMPANY, et al.,	: 09-50026 (REG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**MOTORS LIQUIDATION COMPANY GUC TRUST'S REPLY TO RESPONSES OF
SHARON A. BELL TO THE ONE HUNDRED AND SECOND OMNIBUS OBJECTION
TO CLAIMS (PROOF OF CLAIM NO. 68029)
(Claims Relating to Former Employees Represented by United Auto Workers)**

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TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

The Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”)¹ in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time), files this reply (the “**Reply**”) to the Bell Responses (defined below) interposed to the 102nd Omnibus Objection to Claims (Claims Relating to Former Employees Represented by United Auto Workers) (ECF No. 7104) (the “**Omnibus Objection**”), and respectfully represents:

Preliminary Statement

1. On September 23, 2010, the Debtors filed the Omnibus Objection. The Omnibus Objection seeks the disallowance and expungement of certain employment-related and pension and welfare benefits claims of UAW Employees² on the basis that such claims have been assumed by New GM pursuant to the terms of the Master Purchase Agreement, as described in the Omnibus Objection, are not the responsibility of the Debtors or the GUC Trust and therefore should be disallowed and expunged from the claims register.

2. Responses to the Omnibus Objection were due by October 19, 2010. The responses listed on **Annex “A”** hereto and described further herein were filed with respect to the Omnibus Objection by Sharon A. Bell (the “**Bell Responses**”) relating to Ms. Bell’s claim, Claim No. 68029 (the “**Bell Claim**”).

¹ The Debtors are Motors Liquidation Company (f/k/a General Motors Corporation) (“**MLC**”), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.), Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Omnibus Objection.

3. The Bell Responses are generally not substantive. After reviewing the Bell Responses, the GUC Trust³ respectfully reiterates the Debtors' position in the Omnibus Objection, and submits that Ms. Bell has failed to provide any legal or factual support for the Bell Claim. Notwithstanding Ms. Bell's opposition, the Bell Responses should be dismissed because the Bell Claim relates to liabilities for employment-related grievances of UAW Employees that have been assumed in full by New GM pursuant to the terms of the Master Purchase Agreement. Accordingly, the GUC Trust files this Reply in support of the Omnibus Objection and respectfully requests that the Bell Claim be disallowed and expunged from the claims register.

The Claim Should Be Disallowed and Expunged

4. Ms. Bell has failed to demonstrate the validity of the Bell Claim and, thus, the Bell Claim should be disallowed and expunged. *See, e.g., In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009), *aff'd*, No. 09 Civ. 2229 (DC), 2010 WL 234827 (S.D.N.Y. Jan. 22, 2010) (claimant has burden to demonstrate validity of claim when objection is asserted refuting claim's essential allegations).

The Bell Responses

5. The Bell Responses were filed on behalf of Sharon A. Bell stating opposition to the relief sought in the Omnibus Objection with respect to the Bell Claim. (*See* Proof of Claim and Bell Responses at **Exhibit 1** attached hereto). The Bell Claim alleges an unresolved grievance under appeal with the UAW Local No. 235. In the Bell Responses, Ms. Bell concedes that her employment-related grievance is being resolved through the grievance

³ While the Omnibus Objection was filed by the Debtors, this Reply is being filed by the GUC Trust because, pursuant to the Plan, the GUC Trust now has the exclusive authority to prosecute and resolve objections to Disputed General Unsecured Claims (as defined in the Plan).

procedure for UAW Employees established pursuant to the UAW Collective Bargaining Agreement.

6. Paragraph 8 of the Omnibus Objection explains that pursuant to Section 2.3(a)(xiii) (*Assumed and Retained Liabilities*) of the Master Purchase Agreement, New GM assumed all liabilities with respect to all employment-related obligations and liabilities pertaining to the UAW Employees, including (among other things) all liabilities with respect to claims related to discrimination, torts, compensation, workers' compensation, grievances originating under the UAW Collective Bargaining Agreement, and termination of employment. The Bell Claim and Bell Responses state a grievance originating under the UAW Collective Bargaining Agreement that was assumed in full by New GM pursuant to Section 2.3(a)(xiii) of the Master Purchase Agreement. Therefore, the Debtors and the GUC Trust do not have any liability with respect to the Ms. Bell's employment-related grievance currently under appeal with the UAW Local No. 235.

7. The Bell Responses provides no additional documentation to support the Bell Claim. For the reasons set out above, the Debtors respectfully submit that the Bell Responses should be dismissed, and the Bell Claim should be disallowed and expunged.

Conclusion

8. Because New GM assumed all liabilities with respect to all employment-related obligations and liabilities pertaining to the UAW Employees, the Debtors and the GUC Trust have no liability for the Bell Claim. The GUC Trust reiterates that the Bell Responses have not provided any legal or factual support for the Bell Claim and cannot be afforded prima facie validity under the Bankruptcy Code. Accordingly, the Bell Claim should be disallowed and expunged in its entirety.

9. WHEREFORE, for the reasons set forth above and in the Omnibus Objection, the GUC Trust respectfully requests that the Court grant the relief requested in the Omnibus Objection and such other and further relief as is just.

Dated: New York, New York
April 13, 2012

/s/ Joseph H. Smolinsky
Harvey R. Miller
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Attorneys for Motors Liquidation
Company GUC Trust

Annex A

102nd Omnibus Objection to Claims (Claims Relating to Former Employees Represented by United Auto Workers)					
No.	Proof of Claim No.	Response Docket No.	Name	Total Claimed	Summary
1.	68029	7492 and 9812	Sharon A. Bell	Unliquidated (U)	Ms. Bell's responses state that her employment-related grievance is currently under appeal with the UAW, but asserts that UAW National Leadership and Top Management of General Motors should be allowed to determine the liability amount, and also asserts that MLC is equally liable as New GM for all violations of Ms. Bell's employment.

Exhibit 1

01205407

APS0554328908



UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK		PROOF OF CLAIM
Name of Debtor (Check Only One) <input checked="" type="checkbox"/> Motors Liquidation Company (f/k/a General Motors Corporation) <input type="checkbox"/> MLCS, LLC (f/k/a Saturn LLC) <input type="checkbox"/> MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation) <input type="checkbox"/> MLC of Harlem, Inc (f/k/a Chevrolet-Saturn of Harlem Inc)	Case No 09-50026 (REG) 09-50027 (REG) 09-50028 (REG) 09-13558 (REG)	<p style="text-align: center;"><u>Your Claim is Scheduled As Follows.</u></p> <p style="text-align: center;">FILED - 68029 MOIORS LIQUIDATION COMPANY F/K/A GENERAL MOTORS CORP SDNY # 09-50026 (REG)</p> <div style="text-align: center; border: 1px solid black; border-radius: 50%; width: 100px; height: 100px; margin: 10px auto; display: flex; align-items: center; justify-content: center;"> THE GARDEN CITY GROUP, INC. DEC 2 2009 </div> <p style="font-size: 8px;">If an amount is identified above you have a claim scheduled by one of the Debtors as shown. (This scheduled amount of your claim may be an amendment to a previously scheduled amount.) If you agree with the amount and priority of your claim as scheduled by the Debtor and you have no other claim against the Debtor you do not need to file this proof of claim form. <u>EXCEPT AS FOLLOWS</u>. If the amount shown is listed as DISPUTED, UNLIQUIDATED or CONTINGENT a proof of claim MUST be filed in order to receive any distribution in respect of your claim. If you have already filed a proof of claim in accordance with the attached instructions you need not file again.</p>
Name of Creditor (the person or other entity to whom the debtor owes money or property) BELL SHARON A	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim Court Claim Number _____ (If known) Filed on _____	<p><input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars</p> <p><input type="checkbox"/> Check this box if you are the debtor or trustee in this case.</p>
Name and address where notices should be sent BELL SHARON A 1214 SAINT CLAIR ST DETROIT, MI 48214-3670	Telephone number 313680-9800 Email Address sharonbell@myaw@yahoo.com	
Name and address where payment should be sent (if different from above) 1214 St. Clair Det, MI 48214	Telephone number 313680-9800	<p>5 Amount of Claim Entitled to Priority under 11 U.S.C. § 507(a) If any portion of your claim falls in one of the following categories, check the box and state the amount</p> <p>Specify the priority of the claim</p> <p><input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B)</p> <p><input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4)</p> <p><input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5)</p> <p><input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7)</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8)</p> <p><input type="checkbox"/> Value of goods received by the Debtor within 20 days before the date of commencement of the case - 11 U.S.C. § 503(b)(9) (§ 507(a)(2))</p> <p><input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)()</p> <p style="text-align: center;">Amount entitled to priority</p> <p style="text-align: center;">\$ _____</p> <p style="font-size: 8px;">*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment</p>
<p>1 Amount of Claim as of Date Case Filed, June 1, 2009 If all or part of your claim is secured, complete item 4 below, however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. If all or part of your claim is asserted pursuant to 11 U.S.C. § 503(b)(9), complete item 5</p> <p><input checked="" type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.</p>	<p style="text-align: center;"><i>s. undetermined</i></p>	
<p>2 Basis for Claim <i>Grievance unresolved by Empire Local Union 235 Rowth Stop Appeal # 091</i> (See instruction #2 on reverse side)</p>	<p style="text-align: center;"><i>Grievance # 016543</i></p>	
<p>3 Last four digits of any number by which creditor identifies debtor _____</p> <p>3a Debtor may have scheduled account as _____ (See instruction #3a on reverse side.)</p>	<p>4 Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information</p> <p>Nature of property or right of setoff <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Equipment <input checked="" type="checkbox"/> Other Describe _____</p> <p>Value of Property <i>undetermined</i> Annual Interest Rate _____ %</p> <p>Amount of pre-charge and other charges as of time case filed included in secured claim, if any \$ _____</p> <p>Basis for perfection _____</p> <p>Amount of Secured Claim \$ _____ Amount Unsecured \$ _____</p>	
<p>6 Credits The amount of all payments on this claim has been credited for the purpose of making this proof of claim</p> <p>7 Documents Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)</p> <p>DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.</p> <p>If the documents are not available, please explain in an attachment.</p>	<p>FOR COURT USE ONLY</p>	
<p>Date 11</p>	<p>Signature The person filing this claim must sign it. Sign and print name and title. If any of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.</p> <p><i>Sharon Bell, Sharon Bell 11/29/2009</i></p>	

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules. The attorneys for the Debtors and their court-appointed claims agent, The Garden City Group Inc, are not authorized and are not providing you with any legal advice.

A SEPARATE PROOF OF CLAIM FORM MUST BE FILED AGAINST EACH DEBTOR

PLEASE SEND YOUR ORIGINAL, COMPLETED CLAIM FORM AS FOLLOWS: **IF BY MAIL** THE GARDEN CITY GROUP INC, ATTN: MOTORS LIQUIDATION COMPANY CLAIMS PROCESSING, P.O. BOX 9386, DUBLIN, OH 43017-4286. **IF BY HAND OR OVERNIGHT COURIER** THE GARDEN CITY GROUP INC, ATTN: MOTORS LIQUIDATION COMPANY CLAIMS PROCESSING, 5151 BLAZER PARKWAY, SUITE A, DUBLIN, OH 43017. PROOFS OF CLAIM MAY ALSO BE HAND DELIVERED TO THE UNITED STATES BANKRUPTCY COURT, SDNY, ONL BOWLING GREEN, ROOM 534, NEW YORK, NY 10004. **ANY PROOF OF CLAIM SUBMITTED BY FACSIMILE OR E-MAIL WILL NOT BE ACCEPTED.**

THE GENERAL AND GOVERNMENTAL BAR DATE IS NOVEMBER 30, 2009 AT 5:00 PM (PREVAILING EASTERN TIME)

Court, Name of Debtor, and Case Number

These chapter 11 cases were commenced in the United States Bankruptcy Court for the Southern District of New York on June 1, 2009. You should select the debtor against which you are asserting your claim.

A SEPARATE PROOF OF CLAIM FORM MUST BE FILED AGAINST EACH DEBTOR

Creditor's Name and Address

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. Please provide us with a valid email address. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if the debtor, trustee, or another party in interest files an objection to your claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor, if any.

3a. Debtor May Have Scheduled Account As

Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

4. Secured Claim

Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS below.) State the type and the value of property that secures the claim, attach copies of lien documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507(a)

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

For claims pursuant to 11 U.S.C. § 503(b)(9), indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before June 1, 2009, the date of commencement of these cases. (See DEFINITIONS below.) Attach documentation supporting such claim.

6. Credits

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the Debtor credit for any payments received toward the debt.

7. Documents

Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary. FRBP 3001(c) and (d). If the claim is based on the delivery of health care goods or services, see instruction 2. Do not send original documents, as attachments may be destroyed after scanning.

Date and Signature

The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS

Debtor
A debtor is the person, corporation, or other entity that has filed a bankruptcy case. The Debtors in these Chapter 11 cases are:

Motors Liquidation Company (f/k/a General Motors Corporation)	09-50026 (REG)
MLCS LLC (f/k/a Saturn LLC)	09-50027 (REG)
MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation)	09-50028 (REG)
MLC of Harlem Inc. (f/k/a Chevrolet-Saturn of Harlem Inc.)	09-13558 (REG)

Creditor
A creditor is the person, corporation, or other entity owed a debt by the debtor on the date of the bankruptcy filing.

Claim
A claim is the creditor's right to receive payment on a debt that was owed by the Debtor on the date of the bankruptcy filing. See 11 U.S.C. § 101(5). A claim may be secured or unsecured.

Proof of Claim
A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with The Garden City Group Inc, as described in the instructions above, and in the Bar Date Notice.

Secured Claim Under 11 U.S.C. § 506(a)
A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be

paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Section 503(b)(9) Claim
A Section 503(b)(9) claim is a claim for the value of any goods received by the debtor within 20 days before the date of commencement of a bankruptcy case in which the goods have been sold to the debtor in the ordinary course of such debtor's business.

Unsecured Claim
An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. § 507(a)
Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted
A document has been redacted when the person filing it has masked edited out or otherwise deleted certain information. A creditor should redact and use only the last four digits of any social-security, individual's

tax-identification, or financial-account number, all but the initials of a minor's name, and only the year of any person's date of birth.

Evidence of Perfection
Evidence of perfection may include a mortgage, lien certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

Acknowledgment of Filing of Claim
To receive acknowledgment of your filing from The Garden City Group Inc, please provide a self-addressed, stamped envelope and a copy of this proof of claim when you submit the original claim to The Garden City Group Inc.

Offers to Purchase a Claim
Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(c), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.

Additional Information
If you have any questions with respect to this claim form, please contact Arix Partners at 1 (800) 414-9607 or by e-mail at claims@motorsliquidation.com.

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Sharon Bell
1214 St. Clair
Detroit, MI. 48214
313-680-9800

Honorable Robert E. Gerber, United States Bankruptcy Judge
Room 621 of the United States Bankruptcy Court for the Southern District of New York,
One Bowling Green
New York, New York 10004

**Regarding: Objection to 102nd Omnibus Objection to Claims (Chapter 11 Case No. 09-50026 (REG)
(Docket No. 4180)**

Dear Judge Gerber,

Please acknowledge this letter as my objection to any claims to disallowed or expunge of my claims relating: Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "Debtors"); on September 23, 2010, Motors Liquidation (and all the above) filed a Notice of Debtors' 102nd Omnibus Objection to claims (Claims relating to former employees represented by United Auto Workers). An Objection hearing is to be held on October 26, 2011 please acknowledge my objection to any expunge or disallowance as it pertains to my case Sharon A Bell).

According to my union representative my claims are being discussed through the grievance procedure (National Agreement between General Motor and the United Automobile Workers...) I object to any/and all expunge or disallowance for the fact it would be a great injustice to allow violations of the law as what has occurred in my cases. The union is trying to resolve the problems that I experienced while working for my employer (General Motors/Motors Liquidation Company) for example, the UAW

(union). The UAW National Leadership and Top Management of General Motors should be allowed to determine the liability amount for the recovery claims which I am seeking (Sharon A Bell case 68029) also, Motor Liquidation Company is equally liable as is the New General Motors for all violations of my employment.

In closing I object to any expunge or disallowance of my claims therefore, I object to 102nd Omnibus Objection to Claims relating Sharon A. Bell case 68029 represented by United Auto Workers. My phone number and address is listed above.

Sharon Bell
1214 St. Clair
Detroit, MI. 48214
313-680-9800
March 13, 2011

Honorable Robert E. Gerber, United States Bankruptcy Judge
Room 621 of the United States Bankruptcy Court for the Southern District of New York,
One bowling green
New York, New York 10004
(2 Pages)

Regarding: Objection to 102nd Omnibus Objection to Claims (Chapter 11 Case No. 09-50026 (REG) (Docket No. 4180) (New York, New York, November 8, 2010) I object to any Claim Withdrawn and I object to the 102nd omnibus objection to expunge my claim (Sharon A Bell case number: 68029) I object to any disallowance of my case and expunge of my case (68029) This is a case in chapter 11 Case No. 09-50026 (REG)

Dear Judge Gerber,

I object to the 102nd Omnibus Objection to withdraw my objection claims to not disallowed or expunge of my claims (Case 68029) relating to: Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "Debtors"); on September 23, 2010, Motors Liquidation (and all the above) filed a Notice of Debtors' 102nd Omnibus Objection to claims (Claims relating to former employees represented by United Auto Workers); The liabilities related to my claims are under investigation by the National Labor and Michigan Civil Rights Department.

The employment claims I am concerned about are important factors related to my wages and benefits. These employment issues/claims are the unresolved employment claims between old General Motors LLC, New General Motors and the UAW therefore to disallow or expunge my claims while I have pending investigations in place would be unjust to me. I object to any Claim Withdrawn and/or any disallowance or expunge of my (case 68029).

Please do not disallow or expunge my claims (Case 68029) also I need more time to seek legal advice and to attend the court Objection Adjourn Hearing. I motion the court to cancel or re-schedule the Adjournment Hearing. I am tentatively scheduled to discuss this matter with a potential attorney who may be willing to represent me in this bankruptcy matter. As I have already stated my employment claims have greatly affected my wages and benefits therefore I must plead that the court does not disallow and expunge my claims/case 68029.

As I already noted on November 28, 2010 I appealed the UAW's Umpire Appeal Disposition Settlement under the UAW Constitution again I am required to exhausts all

remedies before taking my case outside. I am requesting that the Objection Adjourned Hearing be rescheduled or canceled. Also, I object to any withdrawal of my claims and or any expunge or disallowance of my case.

On or about November 11, 2010 the UAW-GM (Umpire Section settled my grievance I disagreed with the settlement. I filed an internal appeal on November 28, 2010. My claims are in appeal within the UAW internal grievance appeal procedure. I object to any/and all expunge or disallowance for the fact it would be a great injustice to allow violations of the law as what has occurred in my cases. The union and I are still in disagreement as to the manner in which my grievance was settled. I appealed the Union's disposition settlement. The problems that I experienced while working for my employer (General Motors/Motors Liquidation Company) happen at both the Old General Motors and the New General Motors. Until my cases and grievances are properly settled Motor Liquidation Company is equally liable as is the New General Motors for all violations of my employment.

In closing I object to any expunge or disallowance of my claims therefore, I object to 102nd Omnibus Objection to Claims relating my (Sharon Bell case #68029) represented by United Auto Workers. I also need more time to speak with a lawyer regarding this matter I am schedule to meet with a specific attorney concerning this matter.

Signed,
Sharon Bell
sharonbellgmuaw@yahoo.com

cc: David N. Griffiths , Attorney