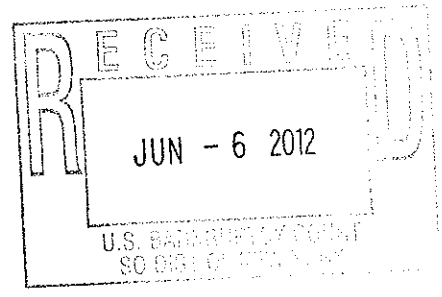


Dr. Terrie Sizemore RN DVM  
PO Box 23  
Sullivan, Ohio 44880  
440-241-3126



Pro se

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

	x	
	:	
<b>In re</b>	:	<b>Chapter 11 Case no.</b>
	:	
<b>MOTORS LIQUIDATION COMPANY, et al</b>	:	<b>09-50026(REG)</b>
<b>F/k/a General Motors Corp., et al.</b>	:	
	:	
<b>Debtors,</b>	:	<b>(Jointly administered)</b>
	:	
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**DR. SIZEMORE'S FORMAL REQUEST OF GM ATTORNEYS TO PROVIDE  
LEGAL BASIS, RATIONALE, AND FINDINGS OF FACT TO SUPPORT THE  
PROPOSED ORDER SERVED THROUGH THE COURT**

Now comes Dr. Terrie Sizemore RN DVM and through this Court formally requests the attorneys for GM provide a legal basis, rationale for this proposed ORDER of May 22, 2012, and findings of fact that justify this ORDER in the part relating to discovery.

More specifically, Dr. Sizemore requests the legal basis for denying her request to Enforce the 363 Sale ORDER and ORDER GM to answer all the interrogatories listed in her Motion to Enforce, dated August 12, 2011. She cannot identify any legal basis, legal rationale, or findings of fact that permit a denial of her request. Merely stating 'because

the Judge said so' does not appear legally sufficient to Dr. Sizemore. If that is the position of GM or the Court, she just wishes to add her request to the record.

In addition, Dr. Sizemore has been unable to locate any legal basis, findings of fact, legal conclusions, or legally justifiable reasons for the conduct of the attorneys she made motion for sanctions against. Please provide the same for this denial of Dr. Sizemore's motion for sanctions. Dr. Sizemore is unable to locate any legal argument made in any document provided the Court or any legal argument made in open Court on April 26, 2012 pertaining to why her motion for sanctions is being denied.

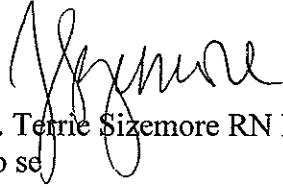
In addition, please provide any legal basis, rationale, and findings of fact for attaching any other item to this ORDER that was/is not on the agenda for the April 26, 2012 Hearing or any pleadings in this matter before the Court relating to Ohio cases not argued here. Dr. Sizemore has not been able to locate the legal basis for the items included in the proposed ORDER.

Please provide any legal basis for how discovery requests violate the bankruptcy documents or any laws in Ohio or New York. In addition, please provide any evidence Dr. Sizemore has filed any motion or any lawsuit just for the 'fun of it,' or without being warranted under existing law or any proof counsel has she was not injured. Please provide any ORDER Dr. Sizemore is or is being accused of being in contempt of that Dr. Sizemore has not understood the procedure regarding.

Please provide any facts in existence or that have been pled to support Dr. Sizemore has acted in a vicious or malicious manner. Dr. Sizemore has spent exhaustive hours studying in a Cleveland Law Library and she is disturbed by the appearance that what she reads appears differently than what she sees occurring.

Please provide any legal basis for these apparent non-bankruptcy issues being sorted out in this bankruptcy Court.

Respectfully submitted,



Dr. Terrie Sizemore RN DVM  
Pro se

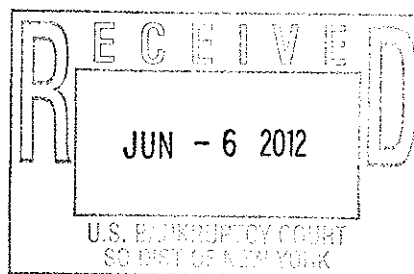
**CERTIFICATE OF SERVICE**

A true and accurate copy of this foregoing DR. SIZEMORE'S FORMAL REQUEST OF GM ATTORNEYS TO PROVIDE LEGAL BASIS, RATIONALE, AND FINDINGS OF FACT TO SUPPORT THE PROPOSED ORDER SERVED THROUGH THE COURT has been served, via regular US Mail on this 3<sup>rd</sup> day of June, 2012

upon the following:

Stephen Karotkin  
WEIL, GOTSHAL, & MANGES LLP  
767 Fifth Ave.  
New York, New York 10153  
Attorneys for General Motors, LLC

Dr. Terrie Sizemore RN DVM  
PO Box 23  
Sullivan, Ohio 44880  
440-241-3126



Pro se

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

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	:	
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<b>F/k/a General Motors Corp., et al.</b>	:	
	:	
<b>Debtors,</b>	:	<b>(Jointly administered)</b>
	:	
	:	
	:	
_____	:	

**DR. TERRIE SIZEMORE’S SECOND SUPPLEMENT TO HER OBJECTION TO  
THE MAY 22, 2012 ORDER OF JUDGE GERBER STEMMING FROM THE  
APRIL 26 2012 HEARING**

Now comes Dr. Terrie Sizemore pursuant to Rule 9074-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York respectfully avails herself of her right to additional supplement to her objection to the ORDER being proposed by GM counsel for Judge Gerber to confirm since she is still within the 14 days permitted by rule. Dr. Sizemore received notice from General Motor’s counsel only permitting her 7 days to object, however, the ORDER itself states 14 days as well as the rule and the minutes to the April 26, 2012 Hearing. Dr. Sizemore apologizes if she has this slightly incorrect and she is actually objecting to an ORDER being drafted and presented by

opposing counsel and not a truly journaled ORDER from the Court at this time. She will take her appeal of any official ORDER as needed or permitted.

Dr. Sizemore wishes to add to the record in this Court that there has been no rebuttal by counsel for GM of many of the facts pled by Dr. Sizemore. To clarify, Dr. Sizemore contended the 363 Sale ORDER and the ARMSPA both confirmed she is and was entitled to discovery of information this Court ORDERED the "New" GM to retain. She also pled that both documents created by and journaled by this Court ORDER "New" GM to 'assist parties in litigation.' In the absence of facts pled contrary-other than Mr. Karotkin merely stating 'Dr. Sizemore was not a covenant party to the bankruptcy' without legal basis and clarification and rationale for why she was party to product liability but not other sections of the documents, it would logically follow the Court would adjudicate the matter in Dr. Sizemore's favor. This is not the case.

Also, Dr. Sizemore is unaware of any of the laws and rules she has relied upon in the State of Ohio conflicting with any laws and rules at the Federal level-in fact they are almost identical. Since this is truthful, she understands the Federal court must adjudicate the matter based on the laws and rules of the forum State. Since Dr. Sizemore's State is Ohio, and if this information is correct, she asserts well established law in Ohio has permitted many other parties to avail themselves of pre-filing discovery pursuant to statutory laws and the Civil Rules of Procedure. In fact, *Benner v. Walker Ambulance Co.*, (Ohio App. 6 Dist., 02-21-1997) 118 Ohio App.3d 341, 692 N.E.2d 1053 clearly states: 'Rule (referring to Civ. R. 34) allowing discovery by person who claims to have a potential cause of action permits discovery of facts necessary to determine if party has valid cause of action against known adverse party; ultimately rule acts as a safeguard

against charges that plaintiff filed frivolous lawsuit in case where wrongdoer or third party has ability to hide facts needed by plaintiff to determine who is wrongdoer and exactly what wrong occurred.' Dr. Sizemore is uncertain as to why other parties would be permitted to avail themselves of statutory provisions and provisions made by the Civil Rules of Procedure and she is not.

Dr. Sizemore understands the rules of discovery in Ohio are submitted to a party on a voluntarily basis-meaning the party served is being politely asked to answer questions. In the event such as Dr. Sizemore's where GM and all parties pertinent have failed to answer the requests made, the legal system has set up the means to obtain the information via Court ORDER. Dr. Sizemore is uncertain of any law or rule in Bankruptcy proceedings that negates this and has been unable to locate such in any documents filed pertaining to these issues.

The transcript reflects counsel for GM, Mr. Karotkin, stated in the June 1, 2010 Hearing that GM would comply with third party discovery requests and he confirmed it was Dr. Sizemore's right to obtain discovery and that her doing so did NOT violate any of the provisions of the 363 Sale ORDER or the ARMSPA. He has not provided any legal basis for his change in position. Is he stating the statements made on June 1, 2010 in open Court in the United States Bankruptcy Court SDNY before the Honorable Judge Gerber were false? Dr. Sizemore is unable to locate any language in the 363 Sale ORDER or the ARMSPA she has violated (other than her products liability claim) pertaining to discovery or any language that prohibits her from approaching GM.

There are no other specific parties listed in this ORDER pertaining to GM affiliates and Dr. Sizemore is confused as to the lack of specificity here and is unable to

respond to this section of the ORDER.

This ORDER proposed by GM attorneys is devoid of any legal basis for the ORDER, any conclusions of law, any legal rationale, or any findings of fact. In fact, Dr. Sizemore contends this ORDER is contrary to the facts and evidence in this matter.

An additional matter Dr. Sizemore wishes to include in the record at this time is in regards to any contempt charge against her. Dr. Sizemore understands she could only be in contempt of an ORDER she understands and knowingly and willfully disobeys. She understands there must be a Hearing to determine if contempt has occurred as well as an opportunity for a party to disclose facts in his or her defense against such a charge. However, an Ohio attorney has advised Dr. Sizemore that Judges are essentially free-shooters and may do whatever they wish and are immune from any and all decisions they make. He stated Judges might place parties in jail for no apparent reason at all. He stated they might jail parties just because they want to. This is frightening to Dr. Sizemore and she is upset about the Court accusing her to other parties on April 26, 2012 of misusing the Court system. Dr. Sizemore is worried she is being viewed as a 'trouble-maker' when all she has ever done is attempt to seek retribution for her injuries. While she may be clumsy at times, that does not constitute any violation of law or rule on her part. She understands other parties have incorrectly listed Defendant parties and have had opportunity to correct such unintentional mistakes. In fact, on July 13, 2011, during a Hearing before this Court, Dr. Sizemore witnesses a party prior to her case being offered help by Judge Gerber to essentially 'fix' his irregularities in his documents. Dr. Sizemore is a law abiding citizen and works hard each day and has only attempted to assert her rights as she has understood them. She contends she represents the majority of the

population in America and is tired of feeling powerless in a system that claims to be fair and just.

Dr. Sizemore is worried that the Court systems send a message to others that 'they' would never be threatened with contempt and jail like Dr. Sizemore feels threatened because 'they' would not be considered trouble-makers and would not need to be made an example of to others to not assert rights that the Court does not like.

As stated, this is frightening to Dr. Sizemore and even though she is not an attorney or a man or any other possible important classification, she asserts she is an American and has been advised she has rights-or at least she has thought she has rights. At times, Dr. Sizemore feels she is held to a higher standard than the men or the attorneys because she is not 'part of the club,' She contends she would not 'feel' this way if she could recognize legally based argument being provided by GM for the requests they persuade the Courts in Ohio and this Bankruptcy Court to side with. In addition, the threat on April 26, 2012 to 'take it out on Dr. Sizemore's hide' is still very disturbing when she was not being accused of wrongdoing on April 26, 2012. Her motions were based on her understanding of what she read in the 363 Sale ORDER and the ARMSPA. She contends GM attorneys did not provide rebuttal argument regarding the over eight months they waited to comply with this Court's July 1, 2010 ORDER, nor did they provide argument for the Ohio attorney's conduct-especially his exhaustive brief filing in the Ohio Courts in the fact of a Federal stay and advising the Courts in Ohio the Federal stay did not apply to them-which Dr. Sizemore thinks is a false statement and is unaware of any procedure necessary to make a stay valid in another Court when all parties are aware of it.



Dr. Sizemore contends the Action for Discovery against "New" GM in Ohio did not violate any laws or rules or ORDERS by this Court. In fact, if GM had answered her discovery requests she would not have made the mistake of listing "New" GM on the products liability action-thus justifying over and over the in. Thus confirming the intelligent act of filing an Action for Discovery. This fact continues to remain ignored. In addition, Dr. Sizemore is permitted by law to litigate against parts suppliers and is permitted by law to obtain the reports she claims confirm her product was defective because she is not an engineer and obtaining this information is the exact reason pre-filing tools have been instituted. There have been no facts pled that only attorney represented parties or attorneys may utilize the pre-filing tool. There have been no facts pled that Dr. Sizemore was not filing a legally permitted filing. In addition, it appears no slick lawyering can occur when the answers are obtained beforehand and mistakes are avoided.

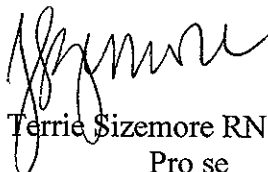
Dr. Sizemore has been very inconvenienced by all the delays she is not responsible for as GM continually claims she has inconvenienced them.

Dr. Sizemore reasserts she understands her Constitutional rights include her right to open Court-by being permitted to petition her government for the redress of grievances,- her right to equal protection under the law, and her right to due process as well as jury trial and others.

All this combined does not make Dr. Sizemore frivolous or vexatious or guilty of any misuse/abuse of the Judicial system. In the presence of a witness in Medina County Court of Common Pleas, Dr. Sizemore was threatened to be punished for trying to 'act like a lawyer.' The constant threats to her are disturbing because she has approached government entities as she approached Court officers and she has never entertained the

thought that she must be frightened of her government in this United States, but she has been advised her thinking is incorrect. She is uncertain as to if the general public is aware of this and the message 'don't mess with the Courts or attorneys with power to crush you.'

Respectfully submitted,

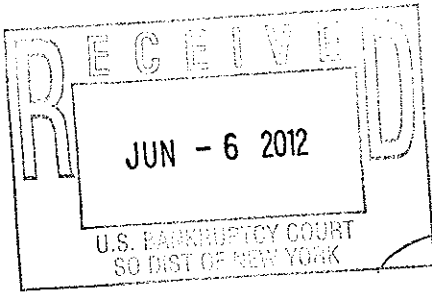


Dr. Terrie Sizemore RN DVM  
Pro se

**CERTIFICATE OF SERVICE**

A true and accurate copy of this foregoing Dr. Terrie Sizemore's Second Supplement to Her Objection to the May 22, 2012 Order of Judge Gerber Stemming from the April 26, 2012 Hearing has been served, via regular US Mail on this 30 day of June, 2012 upon the following:

Stephen Karotkin  
WEIL, GOTSHAL, & MANGES LLP  
767 Fifth Ave.  
New York, New York 10153  
Attorneys for General Motors, LLC



To Whom It  
May Concern:

Please find enclosed

2 copies of 2

filings for the

referenced case. One is

a Ct copy + one is

a chambers copy

Thank you J. J. [Signature]