

Hearing Date and Time: June 28, 2012 at 10:00 a.m. (EDT)

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-and-

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Attorneys for Onondaga County, New York

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

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**In re**

**MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,**

**Debtors.**

**Chapter 11**

**Case No. 09-50026 (REG)**

**Jointly Administered**

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**ONONDAGA COUNTY, NEW YORK**  
**STATEMENT RE: THE PROPOSED LOWER LEY CREEK AND ONONDAGA**  
**SETTLEMENT AGREEMENTS**

Given the disclosures that were included within the filings that constitute the United States' Motion for an Order Approving the Lower Ley Creek Non-Owned Site Consent Decree and Settlement Agreement (the "Lower Ley Creek Settlement Agreement") and the Onondaga Other Non-Owned Site Consent Decree and Settlement Agreement (the "Onondaga Settlement Agreement") (collectively, the "Settlement Agreements") in response to the public comments of Onondaga County, New York seeking an explanation as to the purported bases for the proposed settlements, Onondaga County, New York submits this statement for the sole purpose of informing

the Court that Onondaga County has no objection to the court approving the Lower Ley Creek Settlement Agreement and Onondaga County, New York takes no position with respect to the approval of the Onondaga Settlement Agreement .

The United States has conceded that the County was not a participant in the settlement negotiations and therefore, Onondaga County's legal rights cannot be impaired or prejudiced by entry of the proposed settlements. Nevertheless, Onondaga County, New York affirmatively states for the record that the County's position with respect to approval of the settlements does not constitute Onondaga County's admission of any facts, legal representations or conclusions or agreement with any of the statements made or conclusions drawn by the United States of America in its motion and does not constitute a waiver or withdrawal of any factual or legal defenses Onondaga County, New York may have in any pending or future proceeding or action between or among the United States, the Debtor and/or any third-party with respect to liability and/or divisibility of harm or allocation of response and other Comprehensive Environmental Response, Compensation and Liability Act recoverable costs or damages.

Dated: June 26, 2011

Attorneys for Claimant  
Onondaga County, New York

By: /s/Luis A. Mendez, Esq.  
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**CERTIFICATE OF SERVICE**

I, Kevin C. Murphy, of The Wladis Law Firm, P.C. hereby certify that on the 26<sup>th</sup> day of June, 2012, this office electronically filed Onondaga County, New York's Statement regarding the Proposed Lower Ley Creek and Onondaga Settlement Agreements, in the above-referenced matter, with the Clerk of the Bankruptcy Court using the CM/ECF system, which sent notification to the CM/ECF participants.

June 26, 2012

/s/ Kevin C. Murphy, Esq.