

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

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

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK     )  
                                  ) ss  
COUNTY OF NASSAU    )

I, Barbara Kelley Keane, being duly sworn, depose and state:

1. I am an Assistant Director with GCG, Inc., the claims and noticing agent for the debtors and debtors-in-possession (the “Debtors”) in the above-captioned proceeding. Our business address is 1985 Marcus Avenue, Suite 200, Lake Success, New York 11042-1013.

2. On August 17, 2012, at the direction of Dickstein Shapiro LLP, counsel for Motors Liquidation Company GUC Trust, I caused a true and correct copy of the following document, attached hereto as Exhibit A, to be served by first class mail on Atul C Shah MD, 2884 Manorwood Dr, Troy, Michigan 48085-1165 (affected party):

- **Letter from Stefanie Birbrower Greer, Dickstein Shapiro, LLP, to Hon. Robert R. Gerber, United States Bankruptcy Court, dated August 17, 2012, regarding Proposed Order.**

/s/ Barbara Kelley Keane  
Barbara Kelley Keane

Sworn to before me this  
20<sup>th</sup> day of August, 2012

/s/ Nancy Formica  
Nancy Formica  
Notary Public, State of New York  
No. 41-4933172  
Qualified in Nassau County  
Commission Expires August 8, 2014

# **EXHIBIT A**

**DICKSTEINSHAPIRO**LLP

1633 Broadway | New York, NY 10019-6708  
TEL (212) 277-6500 | FAX (212) 277-6501 | dicksteinshapiro.com

August 17, 2012

**Via E-mail [gerber.chambers@nysb.uscourts.gov]**

Judge Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: **Motors Liquidation Company, et al. - Case No. 09-50026-reg**  
**Claim No. 28820**

Dear Judge Gerber:

We represent Motors Liquidation Company GUC Trust (the “**GUC Trust**”), the successor to Motors Liquidation Company (formerly known as General Motors Corporation) in the above mentioned bankruptcy proceeding. We write in connection with Your Honor’s request that the GUC Trust and Dr. Shah (holder of Claim No. 28820, the “**Claim**”) settle an order reflecting this Court’s decision dated August 6, 2012, disallowing and expunging the Claim (the “**Opinion**”).

The GUC Trust provided Dr. Shah with a copy of a draft proposed order (the “**Proposed Order**”) by email and mail on or about August 7, 2012. We explained to Dr. Shah, both verbally and in writing, that the Proposed Order must reflect the Opinion, and that his consent to the Proposed Order would not affect his right to appeal the relief granted by the Court. Nevertheless, on August 16, 2012, Dr. Shah submitted a detailed objection to the substance of Proposed Order, which challenges the Opinion itself (the “**Order Objection**”). The Order Objection is not only procedurally inappropriate, but also baseless in every respect.

In light of the foregoing, the GUC Trust respectfully submits the Proposed Order for entry by the Court. The GUC Trust submits that the Proposed Order is consistent with the Opinion.

**DICKSTEINSHAPIRO**LLP

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Please contact us should Your Honor need any further information in connection with this matter.

Respectfully submitted,

*Stefanie Birbrower Greer /AMC*

Stefanie Birbrower Greer

cc: Dr. Atul C. Shah