

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

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

In re :  
 : **Chapter 11 Case No.**  
**REMEDICATION AND LIABILITY** : **09- 50029 (REG)**  
**MANAGEMENT COMPANY, INC.,** :  
 :  
**Debtor.** :  
 :  
 -----X

In re :  
 : **Chapter 11 Case No.**  
**ENVIRONMENTAL CORPORATE** : **09-50030 (REG)**  
**REMEDICATION COMPANY, INC.,** :  
 :  
**Debtor.** :  
 :  
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**NOTICE OF DEADLINES FOR FILING PROOFS OF CLAIM  
(INCLUDING CLAIMS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE)**

TO ALL PERSONS AND ENTITIES WITH CLAIMS (INCLUDING CLAIMS UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE) AGAINST A DEBTOR SET FORTH BELOW:

Name of Debtor	Case Number	Tax Identification Number	Other Names Used by Debtors in the Past 8 Years
Remediation and Liability Management Company, Inc. (subsidiary of <b>General Motors Corporation</b> )	09-50029 (REG)	38-2529430	Uptown Land Development Corporation
Environmental Corporate Remediation Company, Inc. (subsidiary of <b>General Motors Corporation</b> )	09-50030 (REG)	41-1650789	GM National Hawaii, Inc. NCRS Hawaii, Inc.

PLEASE TAKE NOTICE THAT, on December 2, 2009, the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) having jurisdiction over the chapter 11 cases of Remediation and Liability Management Company, Inc. and Environmental Corporate Remediation Company, Inc., as debtors in possession (each subsidiaries of **General Motors Corporation**) (collectively, the “**REALM/ENCORE Debtors**”) entered an order (the “**REALM/ENCORE Bar Date Order**”) establishing (i) **February 1, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts) to file a proof of claim (“**Proof of Claim**”) based on prepetition claims including a claim under section 503(b)(9) of the Bankruptcy Code (as described more fully below (a “**503(b)(9) Claim**”)), against any of the

REALM/ENCORE Debtors (the “**REALM/ENCORE General Bar Date**”); and (ii) **April 16, 2010, at 5:00 p.m. (Eastern Time)** as the last date and time for each governmental unit (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim based on prepetition claims against any of the REALM/ENCORE Debtors (the “**REALM/ENCORE Governmental Bar Date**” and, together with the REALM/ENCORE General Bar Date, the “**REALM/ENCORE Bar Dates**”).

The REALM/ENCORE Bar Date Order, the REALM/ENCORE Bar Dates and the procedures set forth below for the filing of Proofs of Claim apply to all claims against the REALM/ENCORE Debtors (other than those set forth below as being specifically excluded) that arose prior to **October 9, 2009**, the date on which the REALM/ENCORE Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

**The REALM/ENCORE Debtors were subsidiaries of General Motors Corporation. The properties owned by the REALM/ENCORE Debtors may have been known to you as property of General Motors Corporation.**

**If you have any questions relating to this Notice, please feel free to contact the Debtors at 1-800-414-9607 or by e-mail at [claims@motorsliquidation.com](mailto:claims@motorsliquidation.com). In addition, you may contact the Official Committee of Unsecured Creditors through its website at [www.motorsliquidationcreditorscommittee.com](http://www.motorsliquidationcreditorscommittee.com) or at 1-212-715-3275.**

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

## **1. WHO MUST FILE A PROOF OF CLAIM**

You **MUST** file a **Proof of Claim** to vote on a chapter 11 plan filed by the REALM/ENCORE Debtors or to share in any of the REALM/ENCORE Debtors’ estates if you have a claim that arose prior to **October 9, 2009**, including a 503(b)(9) Claim, and it is not one of the other types of claims described in Section 2 below. Acts or omissions of the REALM/ENCORE Debtors that occurred before **October 9, 2009** may give rise to claims against the REALM/ENCORE Debtors that must be filed by the applicable Bar Date, notwithstanding that such claims may not have matured or become fixed or liquidated or certain prior to **October 9, 2009**.

Pursuant to section 101(5) of the Bankruptcy Code and as used in this Notice, the word “claim” means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured. Further, claims include unsecured claims, secured claims, priority claims, and 503(b)(9) Claims.

## **2. WHO NEED NOT FILE A PROOF OF CLAIM**

You need not file a Proof of Claim if:

- (a) Your claim is listed on the Schedules (as defined below) and (i) is **not** described in the Schedules as “disputed,” “contingent,” or “unliquidated,” (ii) you do **not** dispute the amount or nature of the claim set forth in the Schedules, and (iii) you do **not** dispute that the claim is an obligation of the specific REALM/ENCORE Debtor against which the claim is listed on the Schedules;
- (b) Your claim has been paid in full;
- (c) You hold a claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an administrative claim; **provided, however, 503(b)(9) Claims are subject to the REALM/ENCORE General Bar Date as provided above.** Section 503(b)(9) provides in part: “...there shall be allowed administrative expenses...including... (9) the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.” **Accordingly, if you have a 503(b)(9) Claim, you must file a Proof of Claim on or before the REALM/ENCORE General Bar Date;**
- (d) You hold a claim that has been allowed by an order of the Court entered on or before the applicable REALM/ENCORE Bar Date;

- (e) You hold a claim against any of the REALM/ENCORE Debtors for which a separate deadline is fixed by the Court (whereupon you will be required to file a Proof of Claim by that separate deadline);
- (f) You are a REALM/ENCORE Debtor in these cases having a claim against another Debtor;
- (g) You are an affiliate (as defined in section 101(2) of the Bankruptcy Code) of any REALM/ENCORE Debtor as of the REALM/ENCORE Bar Date; or
- (h) You hold a claim for which you have already properly filed a Proof of Claim against any of the REALM/ENCORE Debtors with the Clerk of the Court or The Garden City Group, Inc., the Debtors' claims agent, utilizing a claim form that substantially conforms to the Proof of Claim Form (as defined below) or Official Form 10.

**YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE REALM/ENCORE DEBTORS.**

**THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM OR THAT THE REALM/ENCORE DEBTORS OR THE COURT BELIEVE THAT YOU HAVE A CLAIM.**

### **3. EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

If you hold a claim arising from the rejection of an executory contract or unexpired lease, you must file a Proof of Claim based on such rejection by the later of (i) the applicable REALM/ENCORE Bar Date, and (ii) the date which is **thirty days** following the entry of the order approving such rejection or you will be forever barred from doing so. Notwithstanding the foregoing, if you are a party to an executory contract or unexpired lease and you wish to assert a claim on account of unpaid amounts accrued and outstanding as of October 9, 2009 pursuant to that executory contract or unexpired lease (other than a rejection damages claim), you must file a Proof of Claim for such amounts on or before the applicable REALM/ENCORE Bar Date unless an exception identified above applies.

### **4. WHEN AND WHERE TO FILE**

All Proofs of Claim must be filed so as to be **actually received** on or before the applicable REALM/ENCORE Bar Date at the following address:

If by overnight courier or hand delivery to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
5151 Blazer Parkway, Suite A  
Dublin, Ohio 43017

If by first-class mail, to:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company Claims Processing  
P.O. Box 9386  
Dublin, Ohio 43017-4286

Or if by hand delivery to:

United States Bankruptcy Court, SDNY  
One Bowling Green  
Room 534  
New York, New York 10004

Proofs of Claim will be deemed timely filed only if **actually received** by The Garden City Group, Inc. or the Court on or before the applicable REALM/ENCORE Bar Date. Proofs of Claim may **not** be delivered by facsimile, telecopy, or electronic mail transmission.

### **5. WHAT TO FILE**

If you file a Proof of Claim, your filed Proof of Claim must: (i) be written in the English language; (ii) be denominated in lawful currency of the United States; (iii) conform substantially to the form provided with this Notice ("**Proof of Claim Form**") or Official Bankruptcy Form No. 10; (iv) state the REALM/ENCORE Debtor against which it is filed; (v) set forth with specificity the legal and factual basis for the alleged claim; (vi) include supporting documentation or an explanation as to why such documentation is not available; and (vii) be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant.

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE REALM/ENCORE DEBTOR, SEPARATE PROOFS OF CLAIM MUST BE FILED AGAINST EACH SUCH REALM/ENCORE DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC REALM/ENCORE DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT REALM/ENCORE DEBTOR'S BANKRUPTCY CASE. THE NAMES OF THE REALM/ENCORE DEBTORS AND THEIR CASE NUMBERS ARE SET FORTH ABOVE.

Additional Proof of Claim Forms may be obtained at [www.uscourts.gov/bkforms/](http://www.uscourts.gov/bkforms/) or [www.motorsliquidation.com](http://www.motorsliquidation.com).

**YOU SHOULD ATTACH TO YOUR COMPLETED PROOF OF CLAIM FORM COPIES OF ANY WRITINGS UPON WHICH YOUR CLAIM IS BASED. IF THE DOCUMENTS ARE VOLUMINOUS, YOU SHOULD ATTACH A SUMMARY.**

## **6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE APPLICABLE BAR DATE**

*Except with respect to claims of the type set forth in Section 2 above, any creditor who fails to file a Proof of Claim on or before the applicable REALM/ENCORE Bar Date in the appropriate form in accordance with the procedures described in this Notice for any claim such creditor holds or wishes to assert against each of the REALM/ENCORE Debtors, will be forever barred – that is, forbidden – from asserting the claim against each of the REALM/ENCORE Debtors and their respective estates (or filing a Proof of Claim with respect to the claim), and each of the REALM/ENCORE Debtors and their respective chapter 11 estates, successors, and property will be forever discharged from any and all indebtedness or liability with respect to the claim, and the holder will not be permitted to vote to accept or reject any chapter 11 plan filed in these chapter 11 cases, participate in any distribution in any of the REALM/ENCORE Debtors' chapter 11 cases on account of the claim, or receive further notices with respect to any of the REALM/ENCORE Debtors' chapter 11 cases.*

## **7. THE REALM/ENCORE DEBTORS' SCHEDULES, ACCESS THERETO, AND CONSEQUENCES OF AMENDMENT THEREOF**

You may be listed as the holder of a claim against one or more of the REALM/ENCORE Debtors in the REALM/ENCORE Debtors' Schedules of Assets and Liabilities and/or Schedules of Executory Contracts and Unexpired Leases (collectively, the "**Schedules**"). If you rely on the REALM/ENCORE Debtors' Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules.

As set forth above, if you agree with the classification and amount of your claim as listed in the REALM/ENCORE Debtors' Schedules, and if you do not dispute that your claim is only against the specified REALM/ENCORE Debtor, and if your claim is not described as "disputed", "contingent", or "unliquidated", you need not file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable REALM/ENCORE Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Schedules may be examined by interested parties on the Court's electronic docket for the REALM/ENCORE Debtors' chapter 11 cases, which is posted on the Internet at [www.motorsliquidation.com](http://www.motorsliquidation.com) and [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (a PACER login and password are required and can be obtained through the PACER Service Center at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)). Copies of the Schedules may also be examined by interested parties between the hours of 9:00 a.m. and 4:30 p.m. (Eastern Time) at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 511, New York, New York 10004. Copies of the REALM/ENCORE Debtors' Schedules may also be obtained by written request to the REALM/ENCORE Debtors' claims agent at the address and telephone number set forth below:

The Garden City Group, Inc.  
Attn: Motors Liquidation Company  
P.O. Box 9386  
Dublin, Ohio 43017-4286  
1-703-286-6401

In the event that the REALM/ENCORE Debtors amend their Schedules to (a) designate a claim as disputed, contingent, unliquidated, or undetermined, (b) change the amount of a claim reflected therein, (c) change the classification of a claim reflected therein, or (d) add a claim that was not listed on the Schedules, the REALM/ENCORE Debtors will notify you of the amendment. In such case, the deadline for you to file a Proof of Claim on account of any such claim is the later of (a) the applicable REALM/ENCORE Bar Date and (b) the date that is **thirty days** after the REALM/ENCORE Debtors provide notice of the amendment.

**A holder of a possible claim against the REALM/ENCORE Debtors should consult an attorney regarding any matters not covered in this Notice, such as whether the holder should file a Proof of Claim.**

DATED: December 2, 2009  
New York, New York

BY ORDER OF THE COURT

WEIL, GOTSHAL & MANGES LLP  
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New York, New York 10153  
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ATTORNEYS FOR DEBTORS AND  
DEBTORS IN POSSESSION