

OBJECTION DEADLINE: JUNE 15, 2009

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- and -

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*Counsel for Saginaw LLC and Brazing Concepts LLC*

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

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<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>GENERAL MOTORS CORP., et al.,</b>	:	<b>09-50026 (REG)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	
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**LIMITED OBJECTION AS TO CURE AMOUNTS BY SAGINAW LLC  
AND BRAZING CONCEPTS LLC IN RESPONSE TO NOTICE OF  
(I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN  
EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL  
PROPERTY AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL  
PROPERTY AND (II) CURE AMOUNTS RELATED THERETO**

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Saginaw LLC and Brazing Concepts LLC (collectively, the "Objectors"), identified by the above-captioned debtors (the "Debtors") as GSO Capital Partners LP, by and through their undersigned counsel, hereby submit this limited objection to the "Cure Amounts" as defined in the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto dated June 5, 2009, and respectfully represent as follows:

**LIMITED OBJECTION**

1. Upon information and belief, the Debtors have identified certain amounts due the Objectors as Cure Amounts, which alleged amounts total \$311,665.61, as set forth on annexed Exhibit A.

2. The Objectors believe that the Debtors omitted approximately eleven (11) additional unpaid amounts due totaling \$94,217 from Exhibit A. The missing invoices are identified on annexed Exhibit B.

3. The Objectors therefore assert a total Cure Amount of \$405,882.75 is due and owing.

**CONCLUSION**

WHEREFORE, the Objectors request that the Court determine that the Cure Amount due the Objectors is \$405,882.75 and grant such other relief as is equitable and just.

Dated: New York, New York  
June 15, 2009

WOLLMUTH MAHER & DEUTSCH LLP

By: /s/ James N. Lawlor

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*Counsel for Saginaw LLC and Brazing  
Concepts LLC*

# EXHIBIT A

Contract Notices

Page 1 of 5

## Contract Notices

User: 3a8STH8m



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### Supplier Details

Vendor Master ID: **606710171**

Supplier Name: <b>GSO CAPITAL PARTNERS LP</b> Contract Cure Amount: <b>\$311,663.61</b> # of Contracts: <b>9</b>	<a href="#">Click here to view Contracts</a>
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### Cure Amount Details

Remit DUNS	PO Number	BOL	Document Date	Due Date	Amount	
RD878947027	PROMP70003C	114425	5/1/2009	STAYED	\$2,092.21	USD ✓
RD878947027	PROMP70003C	113071	5/1/2009	STAYED	\$20.01	USD ✓
RD878947027	PROMP70003C	114426	5/4/2009	STAYED	\$2,749.81	USD ✓
RD878947027	PROMP70003C	114427	5/5/2009	STAYED	\$2,749.81	USD ✓
RD878947027	PROMP70003C	114428	5/6/2009	STAYED	\$2,155.28	USD ✓
RD878947027	PROMP70003C	114429	5/7/2009	STAYED	\$2,509.08	USD ✓
RD878947027	PROMP70003C	114430	5/8/2009	STAYED	\$2,631.13	USD ✓
RD878947027	PROMP70003K	114431	5/11/2009	STAYED	\$1,078.22	USD
RD878947027	PROMP70003C	114432	5/12/2009	STAYED	\$2,990.54	USD
RD878947027	PROMP70003C	114433	5/13/2009	STAYED	\$2,034.38	USD ✓
RD878947027	PROMP70003C	114434	5/14/2009	STAYED	\$2,570.10	USD ✓
RD878947027	PROMP70003C	114435	5/18/2009	STAYED	\$2,749.81	USD ✓
RD878947027	PROMP70003X	114436	5/18/2009	STAYED	\$2,512.47	USD ✓
RD878947027	PROMP70003C	114437	5/19/2009	STAYED	\$2,271.72	USD ✓
RD878947027	PROMP70003W	114438	5/20/2009	STAYED	\$3,349.28	USD ✓
RD878947027	PROMP70003C	114439	5/21/2009	STAYED	\$1,556.31	USD ✓
RD878947027	PROMP70003C	114440	5/26/2009	STAYED	\$2,566.71	USD ✓

*Short*  
*Short*

179.71  
179.71

RD878947027	PROMP70003K	114441	5/26/2009	STAYED	\$1,257.93	USD ✓
RD878947027	PROMP70003W	114442	5/27/2009	STAYED	\$4,346.86	USD ✓
RD878947027	PROMP70003C	114443	5/28/2009	STAYED	\$3,349.95	USD ✓
RD878947027	PROMP70003W	114444	5/29/2009	STAYED	\$3,206.91	USD ✓
RD175963656	PSS26058	108	10/30/2008	STAYED	<del>\$944.00</del>	USD ✓
RD175963656	PSS26058	114	11/30/2008	STAYED	<del>\$472.00</del>	USD ✓
RD175963656	PSS26058	118	12/23/2008	STAYED	<del>\$872.00</del>	USD ✓
RD878947027	PROMP70001B	115165	5/1/2009	STAYED	\$1,733.91	USD ✓
RD878947027	PROMP700029	114830	5/1/2009	STAYED	\$107.73	USD ✓
RD878947027	PROMP70001D	115167	5/4/2009	STAYED	\$2,640.55	USD ✓
RD878947027	PROMP700029	114832	5/4/2009	STAYED	\$209.19	USD ✓
RD878947027	PROMP700029	114831	5/2/2009	STAYED	\$231.14	USD ✓
RD878947027	PROMP70001B	113076	5/2/2009	STAYED	\$52.10	USD ✓
RD878947027	PROMP700042	115168	5/4/2009	STAYED	\$1,212.74	USD ✓
RD878947027	PROMP70001D	115169	5/4/2009	STAYED	\$630.63	USD ✓
RD878947027	PROMP700029	114833	5/4/2009	STAYED	\$71.82	USD ✓
RD878947027	PROMP70001B	115170	5/5/2009	STAYED	\$469.83	USD ✓
RD878947027	PROMP700029	114834	5/5/2009	STAYED	\$53.87	USD ✓
RD878947027	PROMP70001B	115171	5/5/2009	STAYED	\$939.65	USD ✓
RD878947027	PROMP700029	114835	5/5/2009	STAYED	\$107.73	USD ✓
RD878947027	PROMP70001B	115172	5/6/2009	STAYED	\$2,450.65	USD ✓
RD878947027	PROMP700029	114836	5/6/2009	STAYED	\$233.42	USD ✓
RD878947027	PROMP70001D	115173	5/6/2009	STAYED	\$945.95	USD ✓
RD878947027	PROMP700029	114837	5/6/2009	STAYED	\$107.73	USD ✓
RD878947027	PROMP70001B	115174	5/7/2009	STAYED	\$1,415.77	USD ✓
RD878947027	PROMP700029	114838	5/7/2009	STAYED	\$161.60	USD ✓
RD878947027	PROMP70001D	115175	5/7/2009	STAYED	\$788.29	USD ✓
RD878947027	PROMP70001D	115176	5/8/2009	STAYED	\$157.66	USD ✓
RD878947027	PROMP700029	114840	5/8/2009	STAYED	\$17.96	USD ✓
RD878947027	PROMP70001B	115177	5/9/2009	STAYED	\$1,678.03	USD ✓
RD878947027	PROMP700029	114841	5/9/2009	STAYED	\$191.24	USD ✓
RD878947027	PROMP70001D	115180	5/11/2009	STAYED	\$310.31	USD ✓
RD878947027	PROMP700029	114843	5/11/2009	STAYED	\$35.34	USD ✓
RD878947027	PROMP70001B	115179	5/11/2009	STAYED	\$9.92	USD ✓

Share 35.37

RD878947027	PROMP70001D	115182	5/12/2009	STAYED	\$155.16	USD ✓
RD878947027	PROMP700029	114845	5/12/2009	STAYED	\$17.67	USD ✓
RD878947027	PROMP70001D	115181	5/12/2009	STAYED	\$470.47	USD ✓
RD878947027	PROMP700029	114844	5/12/2009	STAYED	\$53.58	USD ✓
RD878947027	PROMP700029	114846	5/13/2009	STAYED	\$32.49	USD ✓
RD878947027	PROMP70001D	115183	5/13/2009	STAYED	\$285.29	USD ✓
RD878947027	PROMP70001B	115185	5/14/2009	STAYED	\$1,349.41	USD ✓
RD878947027	PROMP700029	114848	5/14/2009	STAYED	\$154.76	USD ✓
RD878947027	PROMP70001D	115184	5/13/2009	STAYED	\$788.29	USD ✓
RD878947027	PROMP700029	114847	5/13/2009	STAYED	\$89.78	USD ✓
RD878947027	PROMP70001B	115186	5/14/2009	STAYED	\$552.51	USD ✓
RD878947027	PROMP700029	114849	5/14/2009	STAYED	\$63.84	USD ✓
RD878947027	PROMP70001B	115187	5/15/2009	STAYED	\$2,483.85	USD ✓
RD878947027	PROMP700029	114850	5/15/2009	STAYED	\$237.98	USD ✓
RD878947027	PROMP70001B	115189	5/17/2009	STAYED	\$1,545.55	USD ✓
RD878947027	PROMP700029	114852	5/17/2009	STAYED	\$176.70	USD ✓
RD878947027	PROMP70001B	115190	5/18/2009	STAYED	\$1,236.06	USD ✓
RD878947027	PROMP700029	114853	5/18/2009	STAYED	\$143.64	USD ✓
RD878947027	PROMP700029	114851	5/16/2009	STAYED	\$104.31	USD ✓
RD878947027	PROMP70001D	115188	5/16/2009	STAYED	\$915.92	USD ✓
RD878947027	PROMP70001B	115191	5/18/2009	STAYED	\$309.02	USD ✓
RD878947027	PROMP700029	114854	5/18/2009	STAYED	\$35.91	USD ✓
RD878947027	PROMP70001B	115192	5/19/2009	STAYED	\$1,087.86	USD ✓
RD878947027	PROMP700029	114855	5/19/2009	STAYED	\$125.69	USD ✓
RD878947027	PROMP70001D	115193	5/19/2009	STAYED	\$788.29	USD ✓
RD878947027	PROMP700029	114856	5/19/2009	STAYED	\$89.78	USD ✓
RD878947027	PROMP70001B	115194	5/20/2009	STAYED	\$2,175.71	USD ✓
RD878947027	PROMP700029	114857	5/20/2009	STAYED	\$251.37	USD ✓
RD878947027	PROMP70001B	115195	5/20/2009	STAYED	\$930.20	USD ✓
RD878947027	PROMP700029	114858	5/20/2009	STAYED	\$107.73	USD ✓
RD878947027	PROMP70001B	115178	5/11/2009	STAYED	\$752.66	USD ✓
RD878947027	PROMP700029	114839	5/7/2009	STAYED	\$89.78	USD ✓
RD878947027	PROMP70001B	115166	5/2/2009	STAYED	\$1,842.38	USD ✓
RD878947027	PROMP700029	114842	5/11/2009	STAYED	\$86.07	USD ✓

RD878947027	PROMP700029	114861	5/23/2009	STAYED	\$287.28 USD ✓
RD878947027	PROMP70001B	115198	5/23/2009	STAYED	\$2,500.47 USD ✓
RD878947027	PROMP70001B	115196	5/21/2009	STAYED	\$2,104.60 USD ✓
RD878947027	PROMP700029	114859	5/21/2009	STAYED	\$197.51 USD ✓
RD878947027	PROMP70001D	115199	5/26/2009	STAYED	\$1,763.37 USD ✓
RD878947027	PROMP700029	114862	5/26/2009	STAYED	\$161.60 USD ✓
RD878947027	PROMP70003J	111230	1/20/2009	STAYED	\$67.94 USD ✓
RD878947027	PROMP700029	114863	5/26/2009	STAYED	\$8.84 USD ✓
RD878947027	PROMP70001B	115201	5/26/2009	STAYED	\$469.83 USD ✓
RD878947027	PROMP700029	114864	5/26/2009	STAYED	\$53.87 USD ✓
RD878947027	PROMP70001B	115200	5/26/2009	STAYED	\$76.78 USD ✓
RD878947027	PROMP70001D	115202	5/27/2009	STAYED	\$945.95 USD ✓
RD878947027	PROMP700029	114865	5/27/2009	STAYED	\$107.73 USD ✓
RD878947027	PROMP70001D	115203	5/27/2009	STAYED	\$788.29 USD ✓
RD878947027	PROMP700029	114866	5/27/2009	STAYED	\$89.78 USD ✓
RD878947027	PROMP700029	114860	5/22/2009	STAYED	\$702.24 USD ✓
RD878947027	PROMP70001B	115197	5/22/2009	STAYED	\$6,093.36 USD ✓
RD878947027	PROMP700029	114867	5/28/2009	STAYED	\$71.82 USD ✓
RD878947027	PROMP70001D	115204	5/28/2009	STAYED	\$1,003.78 USD ✓
RD878947027	PROMP70001D	115205	5/28/2009	STAYED	\$630.63 USD ✓
RD878947027	PROMP700029	114868	5/28/2009	STAYED	\$71.82 USD ✓
RD878947027	PROMP70001B	113388	5/28/2009	STAYED	\$7.46 USD ✓
RD878947027	PROMP70001B	115207	5/30/2009	STAYED	\$2,571.65 USD ✓
RD878947027	PROMP700029	114870	5/30/2009	STAYED	\$296.40 USD ✓
RD878947027	PROMP70001B	115206	5/29/2009	STAYED	\$2,336.52 USD ✓
RD878947027	PROMP700029	114869	5/29/2009	STAYED	\$269.33 USD ✓
RD878947027	PROMP700029	114900	5/31/2009	STAYED	\$148.49 USD ✓
RD878947027	PROMP70001D	115208	5/31/2009	STAYED	\$1,303.80 USD ✓
RD175963656	PCOR200928	50109	5/1/2009	STAYED	\$8,927.00 USD ✓
RD175963656	PCOR200928	50409C	5/4/2009	STAYED	\$24.84 USD ✓
RD175963656	PCOR200928	50409	5/4/2009	STAYED	\$16,730.88 USD ✓
RD175963656	PCOR200928	50509A	5/5/2009	STAYED	\$13,363.92 USD ✓
RD175963656	PCOR200928	50609	5/6/2009	STAYED	\$11,674.00 USD ✓
RD175963656	PCOR200928	50709	5/7/2009	STAYED	\$11,178.00 USD ✓

RD175963656	PCOR200928	50809	5/8/2009	STAYED	<del>\$12,519.36</del> USD ✓
RD175963656	PCOR200928	341	5/11/2009	STAYED	<del>\$24.84</del> USD ✓
RD175963656	PCOR200928	51109	5/11/2009	STAYED	<del>\$8,867.88</del> USD ✓
RD175963656	PCOR200928	51209	5/12/2009	STAYED	<del>\$11,625.12</del> USD ✓
RD175963656	PCOR200928	342	5/13/2009	STAYED	<del>\$124.20</del> USD ✓
RD175963656	PCOR200928	51309	5/13/2009	STAYED	<del>\$10,730.88</del> USD ✓
RD175963656	PCOR200928	51409	5/14/2009	STAYED	<del>\$11,898.36</del> USD ✓
RD175963656	PCOR200928	343	5/18/2009	STAYED	<del>\$26.84</del> USD ✓
RD175963656	PCOR200928	51809	5/18/2009	STAYED	<del>\$12,966.48</del> USD ✓
RD175963656	PCOR200928	51909	5/19/2009	STAYED	<del>\$20,120.40</del> USD ✓
RD175963656	PCOR200928	52009	5/20/2009	STAYED	<del>\$10,283.76</del> USD ✓
RD175963656	PCOR200928	52109	5/21/2009	STAYED	<del>\$7,153.92</del> USD ✓
RD175963656	PCOR200928	52209	5/22/2009	STAYED	<del>\$7,899.12</del> USD ✓
RD175963656	PCOR200928	344	5/26/2009	STAYED	<del>\$24.84</del> USD ✓
RD175963656	PCOR200928	52809	5/28/2009	STAYED	<del>\$27,224.64</del> USD ✓

*\$19,744.48*

**Important Notices:**

All capitalized terms used, but not defined expressly on this website, have the meaning ascribed to such terms in that in the sale motion.

Purchaser's designation of a purchase order as "Noticed" also means that the Purchaser is designating for assumption and assignment all agreements expressly incorporated into and/or referenced in such purchase order.

All contract descriptions that appear in the "Contract ID" field are for purposes of contract identification only and shall not be binding on the Debtors or the Purchaser, as the case may be, or serve as an admission, for any purposes in the debtors' chapter 11 cases, including determining the parties' substantive rights under the contract, establishing the executory nature of a contract or establishing the Debtors' proposed treatment of the contract for purposes of contract assumption and assignment.

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June 11, 2009 @ 12:22:45 PM

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## EXHIBIT B

### Saginaw LLC Pre-Petition Balance Due from GM

Invoice #	Date	Amount
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94	08/29/08	\$12,990.00
100	09/30/08	\$7,794.00
101	09/30/08	\$807.46
102	09/30/08	\$803.70
104	10/31/08	\$463.86
105	10/31/08	\$461.70

110	11/30/08	\$290.70
111	11/30/08	\$292.06

138	05/31/09	\$69,774.66
139	05/31/09	\$472.00
140	05/31/09	\$67.00

94,217.14