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ATTORNEYS FOR KEY
PLASTICS, L.L.C.
**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re Chapter 11
GENERAL MOTORS CORPORATION, *et al.*, Case No. 09-50026
(Jointly Administered)
----- Debtors. x

**LIMITED OBJECTION BY KEY PLASTICS L.L.C. TO
DEBTORS' PROPOSED CURE AMOUNT**

Key Plastics, L.L.C. (“Key Plastics”) objects to Debtors’ proposed cure amount related to its assumption and assignment of Key Plastics’ contracts, and in support of its objection, Key Plastics states:

Background

1. On June 1, 2009 (“Petition Date”), Debtors commenced these voluntary cases under chapter 11 of title 11 of the United States Code.
2. On June 2, 2009, this Court entered an order (“Bidding Procedures Order”) [Docket # 274] approving Debtors’ bidding procedure, which includes a procedure regarding Debtors’ assumption and assignment of executory contracts.

3. Under the Bidding Procedures Order, on or about June 15, 2009, Debtors delivered Debtors' 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 ("Assignment Notice"). The Assignment Notice indicates that Debtors intend to assume and assign Debtors' agreements with Key Plastics ("Key Plastics Agreements"). On Debtors' website ("Contract Website") provided with the Assignment Notice, Debtors propose an overall cure amount of \$393,671¹ ("Proposed Cure Amount") for the Key Plastics Agreements.

4. Key Plastics objects to the Proposed Cure Amount.

Cure Objection

5. Key Plastics does not object to the proposed assumption and assignment of its executory contracts with Debtors (indeed, Key Plastics has signed a trade agreement with Debtors). Key Plastics objects only to the Proposed Cure Amount. Under the Key Plastics Agreements, Key Plastics supplies parts and related services to certain of the Debtors. As of the Petition Date, Debtors owed Key Plastics \$693,250 under the Key Plastics Agreements. Further, the Proposed Cure Amount must cover the time period through assumption and assignment of the Key Plastics Agreements, including any unpaid postpetition obligations.

6. As such, Key Plastics objects to the Proposed Cure Amount.

¹ Debtors' proposed cure amount is listed on a live, secure website, which Debtors appear to update regularly. The listed proposed cure amount is Debtors' proposed cure amount as of the date of this filing.

Relief Requested

Key Plastics, therefore, respectfully requests that Debtors correct the asserted cure amount for the Key Plastics Agreements to reflect the actual cure amount of \$693,250.

Respectfully Submitted:

BODMAN LLP

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