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*Attorneys for Factory Motor Parts Company*

**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-B-50026-reg  
Debtors. :  
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**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS**

**PLEASE TAKE NOTICE** that Factory Motor Parts Corporation ("FMPC") enters its appearance by and through its counsel, Briggs and Morgan ("Briggs") under 11 U.S.C. § 1109(b) of the United States Bankruptcy Code and Rules 2002, 3017(a), 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). Briggs requests that all papers served or required to be served in this case and in any cases consolidated or administered herewith be given to and served upon, and that Briggs be added to the mailing matrix on file with the Clerk of the Bankruptcy Court, as follows:

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**PLEASE TAKE FURTHER NOTICE** that under 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any plan of reorganization and objections, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, personal delivery, telephone, telegraph, telex, facsimile, electronic mail or otherwise, which affect or seek to affect in any way any rights or interests of the debtors

**PLEASE TAKE FURTHER NOTICE** that neither this notice nor any later appearance, pleading, claim, or suit will waive any of FMPC's substantive or procedural rights, including any right: (1) to have final orders in non-core matters entered only after *de novo* review by a United States District Court; (2) to trial by jury in any proceeding so triable in this case or in any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) to any other rights, claims, actions, defenses, setoffs, or recoupments to which FMPC is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, or recoupments FMPC expressly reserves.

Dated: New York, New York  
June 1, 2009

**BRIGGS AND MORGAN P.A.**  
*Attorneys for Factory Motor Parts Company*

By: /s/ John R. McDonald

John R. McDonald

Briggs and Morgan P.A.

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**CERTIFICATE OF SERVICE**

I certify that on June 1, 2009, this office caused the **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES AND DOCUMENTS** to be electronically filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York on behalf of Briggs and Morgan P.A., attorneys for Factory Motor Parts Company. I further certify that copies of the Notice were also served upon all parties in interest via electronic notice.

Dated: June 1, 2009  
New York, New York

**BECKER, GLYNN, MELAMED &  
MUFFLY LLP**  
*Attorneys for Factory Motor Parts Company*

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