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*Attorneys for Screenvision Cinema Network LLC*

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

-----X  
In re: : Chapter 11  
: :  
GENERAL MOTORS CORP., *et al.*, : Case No. 09-50026 (REG)  
: :  
Debtors : Jointly Administered  
: :  
-----X

**OBJECTION OF SCREENVISION CINEMA NETWORK LLC TO  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY  
CONTRACTS AND CURE AMOUNTS RELATED THERETO**

Screenvision Cinema Network LLC (“Supplier”), by its attorneys Foley & Lardner LLP, hereby submits this objection (the “Objection”) to the Debtors’ assumption and assignment of certain executory contracts and the Debtor’s proposed Cure Amounts related thereto. In support of its Objection, Supplier states as follows:

**PRELIMINARY STATEMENT**

1. There is a notation on the Debtors’ contract website that may indicate that Debtors have sent Supplier a notice of (I) Debtors’ Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Real Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the “Assumption and Assignment Notice”), in which the Debtors designate certain agreements (the “Assumable

Executory Contracts”) between Supplier and the Debtors that may be assumed and assigned to Vehicle Acquisition Holdings LLC (the “Purchaser”).

2. To date, Supplier has not received the Assumption and Assignment Notice and has been unable to ascertain the identity of the Assumable Executory Contracts or any Cure Amounts associated therewith.

### **ARGUMENT**

#### **I. Notice is Deficient**

3. To date, Supplier has not received the Assumption and Assignment Notice. While there is some indication on the Debtors’ website that an Assumption and Assignment Notice has been sent to Supplier, Supplier has been unable to ascertain whether the Debtors intend to assume any contracts with Supplier or Cure Amounts associated therewith,

4. Supplier therefore objects to assumption of the Assumable Executory Contracts reserves all rights to object to ant Assumption and Assignment Notice received from the Debtors.

### **RELIEF REQUESTED**

WHEREFORE, Supplier requests that the Court enter an order denying the Debtor’s request to assume and assign the Assumable Executory Contracts, and grant such other and further relief as the Court deems just and proper.

Dated: June 15, 2009

FOLEY & LARDNER LLP

By: /s/ Salvatore A. Barbatano  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2009, I caused the *Objection Of Screenvision Cinema Network LLC To Assumption And Assignment Of Certain Executory Contracts And Cure Amounts Related Thereto* to be served via U.S. Mail on the following at the addresses set forth below:

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Attn: Warren Command Center  
Mail Code 480-206-114  
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Dated: June 15, 2009

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