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Attorneys for the State of Michigan

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

|                    |   |                            |
|--------------------|---|----------------------------|
| _____              | ) | Chapter 11                 |
| In re:             | ) |                            |
| GENERAL MOTORS     | ) | Case No. 09-50026 REG      |
| CORPORATION, et al | ) | (Jointly Administered)     |
| Debtors.           | ) |                            |
| _____              | ) | Honorable Robert E. Gerber |

**MOTION OF BRADLEY K. MORTON**  
**FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

I, Bradley K. Morton, a member of good standing of the bars of the State of Michigan, the United States Bankruptcy Court for the Western District of Michigan, request admission, *pro hac vice*, to represent the State of Michigan in the above-captioned chapter 11 cases.

|                  |  |
|------------------|--|
| Mailing Address: | Bradley K. Morton<br>Assistant Attorney General<br>P.O. Box 30754<br>Lansing, MI 48909 |
| Telephone:       | (517) 373-3203   |
| E-Mail:          | mortonbk@michigan.gov  |

I have submitted the filing fee of \$25 with this motion for *pro hac vice* admission.

Respectfully Submitted,

Michael A. Cox  
Attorney General

/s/ Bradley K. Morton  
Bradley K. Morton (P55459)  
Assistant Attorney General  
Proposed Attorney For the State of Michigan  
P.O. Box 30754  
Lansing, MI 48909  
(517) 373-3203

Dated: June 17, 2009  
Lansing, Michigan

**EXHIBIT A**

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

|                    |   |                            |
|--------------------|---|----------------------------|
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| In re:             | ) |                            |
| GENERAL MOTORS     | ) | Case No. 09-50026 REG      |
| CORPORATION, et al | ) | (Jointly Administered)     |
| Debtors.           | ) |                            |
| _____              | ) | Honorable Robert E. Gerber |

**ORDER ADMITTING**  
**BRADLEY K. MORTON TO PRACTICE, *PRO HAC VICE***

Bradley K. Morton, a member in good standing of the bars of the State of Michigan and the United States Bankruptcy Court for the Western District of Michigan, having requested admission, *pro hac vice*, to represent the State of Michigan in the above-captioned chapter 11 cases;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Bradley K. Morton is admitted to practice, *pro hac vice*, in the above captioned chapter 11 cases, in the United States Bankruptcy Court for the Southern District of New York, subject to payment of the filing fee.

Dated: \_\_\_\_\_, 2009  
New York, New York

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

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

|                    |   |                            |
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| _____              | ) | Chapter 11                 |
| In re:             | ) |                            |
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| GENERAL MOTORS     | ) | Case No. 09-50026 REG      |
| CORPORATION, et al | ) | (Jointly Administered)     |
| Debtors.           | ) |                            |
| _____              | ) | Honorable Robert E. Gerber |

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 17<sup>th</sup> day of June 2009 he caused the Motion of Bradley K. Morton for Admission to Practice, *Pro Hac Vice* and Order Admitting Bradley K. Morton to Practice, *Pro Hac Vice* to be served (a) by its filing on June 17, 2009 to all parties receiving notice via the Court's ECF system and (b) in accordance with the attached service list.

Dated: June 17, 2009

/s/ Bradley K. Morton  
Bradley K. Morton (P55459)

**SERVICE LIST**

Office of the US Trustee for the  
Southern District of New York (via USPS)  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, New York 10004  
Attention: Diana G. Adams, Esq.

General Motors Corporation (via USPS)  
Cadillac Building  
30009 Van Dyke Avenue  
Warren, Michigan 48090  
Attention: Warren Command Center

Weil, Gotshal & Manges LLP (via USPS)  
767 Fifth Avenue  
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Attention: Harvey Miller, Esq.  
Stephen Karotkin, Esq.  
Joseph H. Smolinsky, Esq.

Cadwalader, Wickersham & Taft, LLP (via USPS)  
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New York, New York 10281  
Attention: John J. Rapisardi, Esq.

US Department of the Treasury (via USPS)  
1500 Pennsylvania Avenue NW, Room 2312  
Washington, DC 20220  
Attention: Matthew Feldman, Esq.

Vedder Price, PC (via USPS)  
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New York, New York 10019  
Attention: Michael J. Edelman, Esq.  
Michael L. Schein, Esq.

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1177 Avenue of the Americas  
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Attention: Gordon Z. Novod, Esq.