

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

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

**NOTICE OF RECLAMATION CLAIM OF SUN MICROSYSTEMS, INC.
AND SUN MICROSYSTEMS GLOBAL FINANCIAL SERVICES LLC**

Please be advised that a written reclamation demand on behalf of Sun Microsystems, Inc. and Sun Microsystems Global Financial Services, LLC was served, through counsel, on June 17, 2009 via FedEx delivery, on General Motors and its attorneys of record. A true and correct copy of the written reclamation demand is attached hereto as Exhibit "A" and incorporated herein by reference for all purposes.

Dated: New York, New York
June 17, 2009

WHITE AND WILLIAMS, LLP

By: /s/ Karel S. Karpe
Karel S. Karpe
One Penn Plaza, Suite 4110
New York, NY 10119
Telephone: (212) 631-4421

And

BIALSON, BERGEN & SCHWAB
Patrick M. Costello (*admitted in California*)
2600 El Camino Real, Suite 300
Palo Alto, California 94306
Telephone: (650) 857-9500

*Attorneys for Sun Microsystems, Inc. and Sun
Microsystems Global Financial Services, LLC*

BIALSON, BERGEN & SCHWAB

ATTORNEYS AT LAW

2600 EL CAMINO REAL, SUITE 300
PALO ALTO, CALIFORNIA 94306

TELEPHONE
(650) 857-9500

FACSIMILE
(650) 494-2738

E-MAIL: atty@bbslaw.com

June 17, 2009

SEYMOUR BERGEN
(1923-2003)

ANNETTE G. BIALSON
RETIRED

Via FedEx Standard Overnight

General Motors
Attn. Legal Department
30009 Van Dyke Avenue
Warren, MI 48090-9025
Attention: Warren Command Center
Mailcode 480-206-114

Via FedEx Standard Overnight

Joseph E. Sgroi
Robert B. Weiss
Tricia A. Sherick
Honigman, Miller, Schwartz & Cohn LLP
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226

Via FedEx Standard Overnight

Nathan M. Pierce
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

Re: In re General Motors Corporation et.al., Case No. 09-50026 (REG)

Dear Gentlemen:

This firm is counsel to Sun Microsystems Global Financial Services, LLC and Sun Microsystems, Inc. (collectively "Sun Microsystems"). Pursuant to Section 2-702 of the Uniform Commercial Code as codified under applicable state law and 11 U.S.C. Section 546(c), and without waiving any other rights, remedies or claims, Sun Microsystems hereby demands the return of all goods ("Goods") of any kind or character received by General Motors Corporation, also doing business as GM; the GM Corporation; General Motors Corporation; Saturn, LLC; Saturn Distribution Corporation; and Chevrolet-Saturn of Harlem, Inc. and/or any of their subsidiary, affiliated and other related entities (collectively "GM") from Sun Microsystems, including, without limitation, those Goods shipped, delivered, received by GM as set forth below.

GM PO#	GM Ref #	Equipment Address	Sun SO #	Shipment Date	Equipment	Equipment Cost	Quote #
RMD0004791	1004-6052	767 5 th Ave New York, NY 10153	4342662	04/20/09	SL500	\$24,374.77	T-US-1405837-B
RMD0004792	1004-6052	767 5 th Ave New York, NY 10153	4342728	04/20/09	SL500	\$17,895.47	T-US-1405853-B
					TOTAL:	\$42,270.24	

General Motors
Honigman, Miller, Schwartz & Cohn LLP
Weil, Gotshal & Manges LLP
June 17, 2009
Page 2

By this letter you are instructed to immediately inventory the Goods and keep the Goods segregated from all other inventory, machinery and equipment. Further, you are not permitted to use, sell, encumber or transfer the Goods to any other party.

Please contact the undersigned to arrange for the immediate return of the Goods.

Very truly yours,

BIALSON, BERGEN & SCHWAB


Patrick M. Costello