BUTZEL LONG, a professional corporation

Robert Sidorsky Eric B. Fisher

380 Madison Avenue

New York, New York 10017

Telephone: (212) 818-1110 Facsimile: (212) 818-0494

sidorsky@butzel.com
fishere@butzel.com

Thomas B. Radom (admitted pro hac vice)

Max J. Newman (admitted *pro hac vice*)

41000 Woodward Avenue

Bloomfield Hills, Michigan 48304

Telephone: (248) 258-1616 Facsimile: (248) 258-1439

<u>radom@butzel.com</u> newman@butzel.com

Attorneys for Pioneer Automotive Technologies, Inc.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

Case No. 09-50026 (REG)

GENERAL MOTORS CORP., et al.

Chapter 11

Debtors.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE that the law firm of Butzel Long, a professional corporation, by the undersigned, hereby appears as counsel for Pioneer Automotive Technologies, Inc., pursuant to section 1109 of title 11 of the United States Code, 11 U.S.C. § 101 *et* seq., and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, and requests service of all notices and documents herein upon the following:

Robert Sidorsky, Esq. Eric B. Fisher, Esq. BUTZEL LONG, a professional corporation 380 Madison Avenue New York, New York 10017

Telephone: (212) 818-1110

Facsimile: (212) 818-0494

sidorsky@butzel.com

fishere@butzel.com

Thomas B. Radom, Esq.

Max J. Newman, Esq.

BUTZEL LONG, a professional corporation

41000 Woodward Avenue

Bloomfield Hills, Michigan 48304

Telephone: (248) 258-1616

Facsimile: (248) 258-1439

radom@butzel.com

newman@butzel.com

PLEASE TAKE FURTHER NOTICE that the foregoing request for service includes all

pleadings of any kind, including, without limitation, all notices, applications, motions,

complaints, and orders, whether written or oral, formal or informal, however transmitted or

conveyed, related in any way to the above-captioned debtors, their property, or their estates. The

undersigned requests that their names be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request

for Service of Documents (the "Notice") nor any later appearance, pleading, proof of claim,

claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters

entered only after de novo review by a District Judge, (ii) the right to trial by jury in any

proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii)

the right to have the District Court withdraw the reference in any matter subject to mandatory or

discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any

purpose other than with respect to this Notice, (v) an election of remedies, (vi) any other rights,

claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any

agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly

reserved.

2

Dated: New York New York June 22, 2009

## BUTZEL LONG, a professional corporation

By: /s/ Robert Sidorsky
Robert Sidorsky, Esq.
Eric B. Fisher, Esq.

380 Madison Avenue

22nd Floor

New York, NY 10017

Tel.: (212) 818-1110 Fax: (212) 818-0494

sidorsky@butzel.com

fishere@butzel.com

Thomas B. Radom, Esq. Max J. Newman, Esq. BUTZEL LONG, a professional corporation 41000 Woodward Avenue Bloomfield Hills, Michigan 48304 Telephone: (248) 258-1616

Telephone: (248) 258-1616 Facsimile: (248) 258-1439

<u>radom@butzel.com</u> newman@butzel.com

Attorneys for Pioneer Automotive Technologies, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 2009, I caused a copy of the foregoing to be sent by first-class mail, postage prepaid, to the parties listed below, and by automatic ECF notice to those parties receiving ECF in the above-captioned case:

/s/ Robert Sidorsky
Robert Sidorsky

Weil, Gotshal & Manges LLP Attn: Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky 767 Fifth Avenue New York, New York 10153

Honigman Miller Schwartz and Cohn LLP

Attn: Joseph R. Sgroi Robert B. Weiss Tricia A. Sherick 2290 First National Building 660 Woodward Avenue Detroit, MI 48226

Patrick J. Trostle Jenner & Block LLP 919 Third Avenue, 37<sup>th</sup> Floor New York, New York 10022

United States Trustee
Attn: Diana G. Adams
Brian S. Masumoto
33 Whitehall Street, 21<sup>st</sup> Floor
New York, New York 10004

Kramer Levin Naftalis & Frankel LLP Attn: Thomas Moers Mayer Gordon Z. Novod 1177 Avenue of the Americas New York, New York 10036