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

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

**WITNESS AND EXHIBIT LIST OF PRODUCT LIABILITY CLAIMANT ADVOCATES
TO THE DEBTORS' 363 MOTION FOR THE SALE OF THE "PURCHASED ASSETS"
FREE AND CLEAR OF POTENTIAL SUCCESSOR LIABILITY CLAIMS**

Callan Campbell ("Campbell"), Kevin Junso, *et al.* ("Junso"), Edwin Agosto ("Agosto"),
Kevin Chadwick, *et al.* ("Chadwick"), and Joseph Berlingieri ("Berlingieri," together with
Campbell, Junso, Agosto, and Chadwick, the "**Products Liability Claimants**"), and the Center

for Auto Safety, Consumer Action, Consumers for Auto Reliability and Safety, National Association of Consumer Advocates, and Public Citizen (collectively, the “**Consumer Organizations**,” and together with the Product Liability Claimants, the “**Products Liability Claimant Advocates**”), by and through their respective attorneys, submit this list of potential witnesses that may be called and potential exhibits that may be introduced at the hearing (the “**363 Hearing**”) on the motion (the “**363 Motion**”) of General Motors and certain of its subsidiaries (collectively, “**GM**” or “**Debtors**”) for an order authorizing the sale of certain assets, including its Continuing Brands, to Vehicle Acquisition Holdings LLC, a U.S. Treasury-sponsored purchaser (the “**Purchaser**”).¹

Witnesses

The Product Liability Claimant Advocates (I) may call as witnesses at the 363 Hearing Fritz Henderson and Harry Wilson and (II) reserve the right to call additional witness(es) (A) based on the responses to discovery requests that have just today been provided and that are expected to be continuing over the next several days and (B) in rebuttal to any evidence presented at the hearing.

Exhibits

The Product Liability Claimant Advocates may use any of the exhibits introduced into evidence at the 363 Hearing by any party in interest or designated in advance as exhibits that may be introduced at the 363 Hearing by any party in interest. Additionally, on June 24, 2009, the Debtors produced approximately 386,000 pages of documents and the US Treasury produced approximately 3,000 pages of documents. More documents and responses to interrogatory requests are expected to be produced in the coming days. The Product Liability Claimant

¹ Capitalized terms used herein and not otherwise defined shall have the meaning set forth in the Product Liability Claimant Advocates’ limited objection, the Debtors’ 363 Motion, or the Master Purchase Agreement (“MPA”) attached to the 363 Motion.

Advocates reserve the right to amend or supplement this list based on the documents received and responses served. Additionally, depositions Messrs. Henderson, Wilson, and Raleigh are scheduled for June 27-29, 2009, and the Product Liability Claimant Advocates reserve the right to designate portions of the transcripts of these depositions as exhibits at the 363 Hearing.

Dated: June 25, 2009

CALLAN CAMPBELL, KEVIN JUNSO, ET AL.,
EDWIN AGOSTO, KEVIN CHADWICK, ET AL., AND
JOSEPH BERLINGIERI

By: /s/ Steve Jakubowski
One of Their Attorneys

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CENTER FOR AUTO SAFETY, CONSUMER ACTION,
CONSUMERS FOR AUTO RELIABILITY AND SAFETY,
NATIONAL ASSOCIATION OF CONSUMER
ADVOCATES, AND PUBLIC CITIZEN

By: /s/ Adina H. Rosenbaum
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Steve Jakubowski, hereby certify that I served a copy of the **WITNESS AND EXHIBIT LIST OF PRODUCT LIABILITY CLAIMANT ADVOCATES TO THE DEBTORS' 363 MOTION FOR THE SALE OF THE "PURCHASED ASSETS" FREE AND CLEAR OF POTENTIAL SUCCESSOR LIABILITY CLAIMS** on the parties listed below via email unless otherwise specified. Additionally, upon electronically filing with the Clerk of the Court all parties were served via the Court's electronic notification system on June 25, 2009.

/s/ Steve Jakubowski

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