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

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<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>MOTORS LIQUIDATION COMPANY, et al.,</b>	:	<b>09-50026 (REG)</b>
<b>f/k/a General Motors Corp., et al.</b>	:	
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	
-----X		

**REPLY OF DEBTORS TO OBJECTION OF  
BOYD BRYANT TO MOTION FOR ENTRY OF AN  
ORDER PURSUANT TO BANKRUPTCY RULES 9006(b) AND  
9027 TO ENLARGE THE TIME TO REMOVE RELATED PROCEEDINGS**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) and its  
affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), respectfully represent:

**Background**

1. In order to provide for the orderly administration of these cases and  
provide sufficient time to assess, on an individual case-by-case basis, the propriety of removing  
more than 31,000 litigation claims of which the Debtors are aware, the Debtors have filed a  
motion (the “**Motion**”), pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure

(the “**Bankruptcy Rules**”) to enlarge the time, under Bankruptcy Rule 9027(a), to file notices of removal (the “**Removal Period**”) until the date an order is entered confirming any chapter 11 plan in the Debtors’ chapter 11 cases [Docket No. 3674].

2. An individual plaintiff, Boyd Bryant (“**Bryant**”), has filed an objection to the Motion at Docket No. 3785, despite acknowledging that Bryant’s own action has already been removed.

### **The Objection Should Be Overruled**

3. In his objection, Bryant concedes that his case has already been removed. Accordingly, Bryant does not have standing to object to the extension of the removal deadline, as the determination of the issue will have no effect on his case. Bryant also does not have standing to object on behalf of other parties in interest in these cases, regardless of whether they are similarly situated. *See Krys v. Official Comm. of Unsecured Creditors (In re Refco Inc.)*, 505 F.3d 109, 117 & n.9 (2d Cir. 2007) (stating a party cannot establish standing by raising another person’s legal rights) (citing *In re Ionosphere Clubs, Inc.*, 101 B.R. 844, 849 (Bankr. S.D.N.Y. 1989)).

4. Identifying and implementing procedures for efficiently resolving many thousands of lawsuits pending in state and federal courts throughout the United States and abroad will be a focal point of these chapter 11 cases. Given the large number of lawsuits, the Debtors need to institute certain common procedures to address each claim. The Debtors intend to move these cases forward expeditiously. Nevertheless, new management of Motors Liquidation Company needs time to gather information and develop appropriate strategies and procedures. Therefore it is appropriate to extend the Removal Period through confirmation to establish these

procedures. The Debtors should not have to be at risk that their right to remove in the interim will be vitiated.

WHEREFORE the Debtors respectfully request that the Court grant the Motion in all respects, overrule the Objection in its entirety, and grant the Debtors such other and further relief as it deems just and proper.

Dated: New York, New York  
August 17, 2009

/s/ Joseph H. Smolinsky  
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