

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* : :
Debtors. : (Jointly Administered)
: :
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**NOTICE OF AGENDA OF MATTERS
SCHEDULED FOR HEARING ON NOVEMBER 24, 2009 at 10:30 a.m.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, before the Honorable Robert E.
Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling
Green, New York, NY 10004-1408

I. CONTESTED MATTER:

1. Motion of Sang Chul Lee and Dukson Lee for Order Pursuant to Section 362(d) of the Bankruptcy Code, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 Modifying the Automatic Stay to Allow Continuation of Pre-Petition Litigation [**Docket No. 3023**]

Response Deadline: July 31, 2009 at 4:00 p.m.

Responses Filed:

- A. Debtors' Opposition to the Motion of Sang Chul Lee and Dukson Lee for Order Pursuant to Section 362(d) of the Bankruptcy Code, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 Modifying The Automatic Stay to Allow Continuation of Pre-Petition Litigation [**Docket No. 3485**]

Replies Filed: None to date.

Additional Document(s):

- B. Notice of Appeal filed by Michael S. Kimm on behalf of Dukson Lee, Sang Chul Lee [**Docket No. 3060**]

Status: This matter will be going forward.

II. UNCONTESTED MATTERS:

2. Motion of Debtors for Entry of Order Pursuant to Fed. R. Bankr. P. 9019 Approving Settlement Agreement and Compromise [**Docket No. 4355**]

Response Deadline: November 17, 2009 at 4:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

Status: This matter will be going forward.

3. Debtors' Ninth Omnibus Motion Pursuant to 11 U.S.C. § 365 to Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property [**Docket No. 4437**]

Response Deadline: November 18, 2009 at 4:00 p.m.

Response Filed:

- A. Objection of Fountain Lakes I, L.L.C. ("**Fountain Lakes**") to Debtors' Ninth Omnibus Motion Pursuant to 11 U.S.C. § 365 to Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property [**Docket No. 4495 & 4496**]

Reply Filed: None to date.

Additional Document(s):

- B. Stipulation to Adjourn Ninth Omnibus Motion Pursuant to 11 U.S.C. §365 to Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property as to MTech Associates LLC ("**MTech**") Only [**Docket No. 4483**]

Status: This matter will be going forward on an uncontested basis with respect to all parties except Fountain Lakes, MTech and Renover Shreveport, LLC. The Motion with respect to those parties will be adjourned to a future hearing date agreed upon by the relevant parties.

III. ADJOURNED MATTERS:

4. Debtors' Third Omnibus Motion Pursuant to 11 U.S.C. §365 to Reject Certain Unexpired Leases of Nonresidential Real Property (Tricon Verizon Leasing Only) **[Docket No. 3044]**

Response Deadline: N/A

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

Status: This matter will be adjourned to a future hearing date mutually agreed upon by the parties.

5. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3212]**

Response Deadline: July 29, 2009 at 4:00 p.m.

Response Filed:

- A. Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3534]**

Reply Filed:

- B. Debtors' Reply to Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Person Property Agreements and/or Abandonment of Collateral to Secured Creditors **[Docket No. 3585]**

Additional Document(s):

Status: This matter will be adjourned to a future hearing date mutually agreed upon by the parties.

6. Application for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to have Knowledge of the Relevant Matters filed by N. Kathleen Strickland on behalf of Remy International, Inc. **[Docket No. 3770]**

Response Deadline: August 20 2009 at 5:00 p.m.;
Extended to November 17, 2009 at 4:00 p.m.;
December 9, 2009 at 4:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s):

- A. Notice of Presentment of Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Compelling Production of Documents by, and Oral Examination of, the Debtors by N. Kathleen Strickland on behalf of Remy International, Inc. [**Docket No. 3769**]

Status: This matter will be adjourned to December 16, 2009 at 2:00 p.m.

- 7. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreement and/or Abandonment of Equipment [**Docket No. 4328**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed:

- A. Limited Objection of Wachovia Financial Services, Inc. to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Equipment [**Docket No. 4401**]

Reply Filed: None to date.

Additional Document(s): None to date.

Status: This matter will be adjourned to a future hearing date mutually agreed upon by the parties.

- 8. Motion of Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 4324**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed: None to date.

Reply Filed: None to date.

Additional Document(s): None to date.

Status: This matter will be adjourned to a future hearing date mutually agreed upon by the parties.

9. Debtors' Motion to Assume and Assign Certain Unexpired Leases of Equipment and Related Executory Contracts [**Docket No. 4331**]

Response Deadline: November 6, 2009 at 4:00 p.m.

Response Filed:

- A. Limited Objection of GE Capital Corporation and U.S. Bank, as Owner Trustee on its Behalf, to Debtors' Motion to Assume and Assign Certain Unexpired Leases of Equipment and Related Executory Contracts [**Docket No. 4386**]

Reply Filed: None to date.

Additional Document(s): None to date.

Status: This matter will be adjourned to a future hearing date mutually agreed upon by the parties.

Dated: November 20, 2009
New York, New York

/s/ Joseph H. Smolinsky _____

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

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