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

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: **Chapter 11 Case No.**
: **09-50026 (REG)**
: **(Jointly Administered)**
: **Debtors.**
: **(Jointly Administered)**
: **(Jointly Administered)**
: **(Jointly Administered)**
: **(Jointly Administered)**
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**REPLY OF DEBTORS TO MOTION OF ADVANCED
ENVIRONMENTAL TECHNOLOGY CORPORATION
REQUESTING AN ENLARGEMENT OF THE TIME IN WHICH TO
FILE A PROOF OF CLAIM PURSUANT TO FED. R. BANKR. P. 9006(b)(1)(2)**

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. On September 16, 2009 this Court entered the Order Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Bankruptcy Code Section 503(b)(9)) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof [Docket

No. 4079], establishing November 30, 2009 (the “**General Bar Date**”) as the general bar date for filing proofs of claim against the Debtors.

2. On December 1, 2009, AETC’s proof of claim number 67808 (the “**AETC Proof of Claim**”) was deemed filed.

3. On December 11, 2009, Wolff & Samson PC, counsel for Advanced Environmental Technology Corporation (“**AETC**”), filed the (i) Motion Requesting An Enlargement of the Time in Which to File a Proof of Claim Pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1)(2) [Docket No. 4654] (the “**Motion**”), (ii) Declaration of Diana L. Buongiorno, Esq. [Docket No. 4655], and (iii) Declaration of Diana L. Buongiorno, Esq. (amending Exhibit “A”) [Docket No. 4664].

The Debtors Have No Objection to a Finding of Excusable Neglect

4. The Debtors have reviewed the specific facts and circumstances surrounding the filing of the AETC Proof of Claim. Although the General Bar Date was fixed by order of this Court, based on the specific facts and circumstances surrounding the filing of the AETC Proof of Claim, the Debtors have no objection to a finding of excusable neglect under the standards set forth in *Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. P’ship, et al.*, 507 U.S. 380, 382 (1993); Fed. R. Bankr. P. 9006(b)(1). The Debtors’ position is limited to the facts and circumstances set forth in the Motion, and the Debtors reserve all rights with respect to other late-filed claims.

5. The Debtors have not reviewed the substance of the AETC Proof of Claim and reserve all rights to object to the AETC Proof of claim on any other grounds.

WHEREFORE the Debtors respectfully request that, to the extent the Court finds AETC has demonstrated excusable neglect or otherwise grants the Motion, the order provide that the rights of the Debtors to object to the AETC Proof of Claim on any other grounds is expressly reserved.

Dated: New York, New York
January 14, 2010

/s/ Joseph H. Smolinsky
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