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

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: **Chapter 11 Case No.**
In re : **09-50026 (REG)**
: **(Jointly Administered)**
: **MOTORS LIQUIDATION COMPANY, et al.,**
: **f/k/a General Motors Corp., et al.**
: **Debtors.**
:
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**DEBTORS' RESPONSE TO MOTION FOR AUTHORIZING DEBTORS TO
HONOR PREPETITION OBLIGATIONS TO CUSTOMERS**

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

Motors Liquidation Company (f/k/a General Motors Corporation) and certain of its subsidiaries, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "**Debtors**"), submit this response to the Motion for Authorizing Debtors to Honor Prepetition Obligations to Customers [Docket No. 4714] (the "**Motion**"). The Motion was filed by Sherif Rafik Kodsy, pro se ("**Movant**").

1. It is unclear to the Debtors what relief the Motion is seeking and the Motion is not set for hearing. On January 14, 2010, counsel for the Debtors conferred with Movant regarding the Motion. Movant stated that he was not seeking to modify the

automatic stay provided for in section 362 of the Bankruptcy Code and that he seeks to reserve his rights to pursue a claim against the Debtors.

2. The Debtors reserve all of their rights and defense to any and all claims Movant has asserted or may assert against them.

Dated: January 19, 2010

New York, New York

/s/ Stephen Karotkin

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