

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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SUPPLEMENTAL DECLARATION AND DISCLOSURE STATEMENT OF  
ROSALEE M. MCNAMARA,  
ON BEHALF OF LATHROP & GAGE LLP

STATE OF MISSOURI )  
) ss:  
COUNTY OF JACKSON )

ROSALEE MCNAMARA being duly sworn, upon his oath, deposes and says:

1. I am a PARTNER of LATHROP & GAGE LLP located at 2345 Grand Blvd., Suite 2200, Kansas City, MO 64108 (the “**Firm**”).

2. On July 9, 2009, Rosalee M. McNamara executed a Declaration and Disclosure Statement (the “**Declaration**”) in support of 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**”) retention of Lathrop & Gage LLP as ordinary course professionals to provide legal services with respect to manufacturing, labor and employment, environmental, and workers compensation matters and submitted that Declaration and a completed Retention Questionnaire (the “**Questionnaire**”) to the Debtors’ bankruptcy counsel, to be filed with the Court in accordance with the procedures

set forth in the order entered July 1, 2009 authorizing the Debtors to employ professionals utilized in the ordinary course of business [Docket No. 2900]. The Debtors subsequently filed the Declaration and Questionnaire with the Court on July 17, 2009 [Docket No. 3224].

3. Subsequent to the filing of the original declaration, Browning-Ferris Industries of Ohio, Inc., requested that Lathrop & Gage LLP file a proof of claim on its behalf in Debtors' bankruptcy case regarding Debtors' alleged contractual and environmental liability at the Ford Road Superfund Site, a matter unrelated to matters in which Lathrop & Gage LLP is acting or has acted as an ordinary course professional on behalf of Debtors. Prior to filing the proof of claim, Lathrop & Gage LLP discussed the proposed filing with bankruptcy counsel for Debtors, who indicated that he had no objection to Lathrop & Gage LLP's representation of Browning-Ferris Industries of Ohio, Inc. with respect to the claim as long as it does not conflict with matters in which Lathrop & Gage LLP represents or has represented the Debtors as an ordinary course professional.

4. Therefore, by this supplemental declaration the Firm supplements the previous Declaration to include this additional disclosure.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

Dec. 18, 2009.

By:

