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

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

**FEE EXAMINER’S STATEMENT OF NO OBJECTION  
TO THE FINAL APPLICATION OF ALAN CHAPELL**

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

The Fee Examiner of General Motors Corporation (n/k/a Motors Liquidation Company), appointed on December 23, 2009, submits this *Statement of No Objection* pursuant to the *Stipulation and Order With Respect to Appointment of a Fee Examiner* [Docket No. 4708] (the “**Fee Examiner Order**”) in connection with the *Final Application of Alan Chapell, Consumer Privacy Ombudsman, Appointed Pursuant to Section 332 of the Bankruptcy Code for Final Approval and Allowance of Compensation for Services Rendered During the Period from June 8, 2009 Through and Including October 4, 2009* [Docket No. 4456] (the “**Chapell Application**”).

The Fee Examiner respectfully represents:

## PRELIMINARY STATEMENT

1. The Court appointed the Fee Examiner to monitor the fees and expenses incurred by professionals in these chapter 11 cases and to provide periodic reports to the Court, separately or in conjunction with applications submitted for approval by the professionals. With this *Statement of No Objection*, the Fee Examiner concludes that the fees requested in the Chapell Application are not objectionable.

2. On June 10, 2009, Diana G. Adams, the United States Trustee for the Southern District of New York, appointed Alan Chapell as the Consumer Privacy Ombudsman (the “**Ombudsman**”) pursuant to the *Order Pursuant to 11 U.S.C. §§ 105, 363 and 365 and Fed.R.Bankr.P. 2002, 6004 and 6006, (I) Approving Procedures for Sale of Debtors’ Assets Pursuant to Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser; (II) Scheduling Bid Deadline and Sale Hearing Date, (III) Establishing Assumption and Assignment Procedures, and (IV) Fixing Notice Procedures and Approving Form of Notice* [Docket No. 274, ¶ 13, at 13].

3. On July 1, 2009, the Ombudsman filed his report under 11 U.S.C. § 332(b). The Ombudsman appeared at the hearing on June 30, 2009, continued to and including July 1, 2009, and on July 1, 2009, responded to the Court’s inquiries as they related to the facts, circumstances and conditions of the Debtors’ proposed sale of “personally identifiable information,” as defined under 11 U.S.C. § 363(b)(1)(B).

4. On November 16, 2009, the Chapell Application was filed seeking total compensation in the amount of \$72,900.00. As a result of the Court’s *Order Pursuant to 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “**Compensation Order**”) [Docket No. 3711],

the Ombudsman has previously been paid \$57,120.00 on the basis of the June and July Monthly Fee Statements of the Ombudsman. Chapell Application, Exhibits D and E.

5. The Fee Examiner has evaluated the Chapell Application and the *Notice of Appointment of Consumer Privacy Ombudsman* [Docket No. 565]. In addition, counsel to the Fee Examiner spoke personally with the Ombudsman to review specific matters relevant to an evaluation of the reasonableness of the fees requested in the Chapell Application—including the work done, the rates charged and the value to the estate.

6. The Fee Examiner has no objection to the Chapell Application. His services have concluded, and if and when Mr. Chapell or the Debtors schedule a hearing for final compensation, the Fee Examiner does not intend to make any appearance.

#### **CONCLUSION**

WHEREFORE, the Fee Examiner respectfully submits this *Statement of No Objection* to entry of the *Order Pursuant to § 330, Granting the Final Application of Alan Chapell, Consumer Privacy Ombudsman, Appointed Pursuant to Section 332 of the Bankruptcy Code, Allowing Final Compensation for Services Rendered During the Period from June 8, 2009 through and Including October 4, 2009*, Chapell Application, Exhibit G.

Dated: Madison, Wisconsin  
February 16, 2010.

GODFREY & KAHN, S.C.

By:           /s/ Katherine Stadler            
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