

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

Presentment Date and Time
March 25, 2010
at 9:45 A.M.

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In re :
Bankruptcy of Motors Liquidation Company :
(f/k/a General Motors Corporation) ("MLC") :
Debtor. :
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Chapter 11
Case No. 09 - 50026 (REG)

**MOTION PURSUANT TO 11 U.S.C. § 362(d) MODIFYING THE AUTOMATIC
STAY IMPOSED BY 11 U.S.C. § 362(a) AFTER MATERIAL DEFAULT**

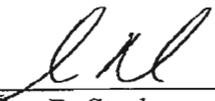
Stanley R. Stasko respectfully states:

- 1) that I am the Plaintiff (Pro Se Litigant) in the civil action Stasko vs. General Motors Corporation (See Exhibit A; United States District Court Eastern District of Michigan; Case # 2:09-CV-14827; Honorable Judge Julian Abele Cook).
- 2) that on December 11, 2009, the Plaintiff filed a civil action for deprivation of rights against General Motors Corporation under Title 42 USC Section 1983 (states "... every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suite in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory degree was violated or declaratory relief was unavailable.") (See Exhibit A; Case # 2:09-CV-14827; Complaint Item (7))

- 3) that on January 5, 2010, the Plaintiff requested a hearing in civil action Stasko vs. General Motors Corporation (United States District Court Eastern District of Michigan; Case # 2:09-CV-14827) stating that "...the defendant has not responded to the Complaint and Summons as of January 3, 2010..."; therefore, requesting "...the court to find in favor of the plaintiff and the court to determine the amounts to be awarded the plaintiff...". (See Exhibit B; Request for Hearing filed January 5, 2010; Case # 2:09-CV-14827)
- 4) that the Plaintiff received a letter dated January 29, 2010, from Weil, Gotshal & Manges LPP stating that "... on June 1, 2009, MLC (Motors Liquidation Company; f/k/a General Motors Corporation) filed a voluntary petition seeking bankruptcy protection under chapter 11 of title 11 of the United States Code ... in the United States Bankruptcy Court for the Southern District of New York. The chapter 11 case bears case no. 09-50026 (REG). Under section 362 of the Bankruptcy Code, all actions pending against MLC are automatically stayed." (See Exhibit C)
- 5) that the Plaintiff filed civil action Stasko vs. General Motors Corporation on December 11, 2009, (after June 1, 2009) for three reasons.
- 6) Reason #1 – Discovery Delays (See Exhibit A; Case # 2:09-CV-14827; Complaint Item (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), (21), (22), (23), and (24))
- 7) Reason #2 – Mental Disability; "Loss of Memory" (See Exhibit A; Case # 2:09-CV-14827; Complaint Item (25), (26), (27), (28), (29), (30), (31), (32), (33), (34), (35), (36), and (37))

- 8) Reason #3 – Fraudulent Concealment by General Motors Corporation (See Exhibit A; Case # 2:09-CV-14827; Complaint Item (38), (39), (40), (41), (42), (43), (44), (45), (46), (47), (48), (49), (50), (51), (52), (53), (54), and (55))
- 9) therefore; the Plaintiff in the civil action Stasko vs. General Motors Corporation, United States District Court Eastern District of Michigan, Case # 2:09-CV-14827 requests the court order the automatic stay imposed in Bankruptcy of Motors Liquidation Company (f/k/a General Motors Corporation) (“MLC”), United States Bankruptcy Court – Southern District of New York, Case # 09-50026 (REG) by section 362(a) of the Bankruptcy Code is vacated under section 362(d)(1) of the Bankruptcy Code as to the Plaintiff’s interests in the Property to allow the Plaintiff’s enforcement of its rights in, and remedies in and to, the Property associated with the civil action Stasko vs. General Motors Corporation, United States District Court Eastern District of Michigan, Case # 2:09-CV-14827.

Dated: February 16, 2010



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