

HEARING DATE AND TIME: April 29, 2010 at 9:45 a.m. (Eastern Time)
OBJECTION DEADLINE: April 22, 2010 at 4:00 p.m. (Eastern Time)
REPLY DEADLINE: April 26, 2010 at 12:00 noon (Eastern Time)

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

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In re Chapter 11
MOTORS LIQUIDATION COMPANY, *et al.*, Case No. 09-50026 (REG)
(f/k/a General Motors Corp., *et al.*)
Debtors. (Jointly Administered)
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**NOTICE OF ADJOURNED HEARING ON MOTION OF ZINN COMPANY, INC. FOR
ORDER COMPELLING DEBTORS AND THEIR SUCCESSOR TO COMPLY WITH
PAYMENT OBLIGATION UNDER WIND-DOWN AGREEMENT**

PLEASE TAKE NOTICE that the hearing scheduled before the Honorable Robert E. Gerber, United States Bankruptcy Judge, for April 8, 2010 at 9:45 a.m. on the motion of Zinn Company, Inc. ("**Zinn**") for an order compelling debtors and their successor to comply with payment obligations under the wind down-agreement [Docket No. 5104] (the "**Motion**") has been adjourned to **April 29, 2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242 on the undersigned counsel for Zinn and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500

Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq. and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); and (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Matthew L. Schwartz, Esq.); (x) the members of the Official Committee of Unsecured Creditors Holding Asbestos Related Claims; (xi) if appointed, the legal representative for holders of future asbestos personal injury claims; (xii) all entities that requested notice in these chapter 11 cases under Bankruptcy Rule 2002, so as to be received no later than **April 22, 2010, at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
April 1, 2010

s/ *Kathlyn Schwartz*

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