G. Alan Wallace (P69333) Fraser Trebilcock Davis & Dunlap, P.C. 124 West Allegan Street, Suite 1000 Lansing, Michigan 48933 Telephone: (517) 377-0822 Fax: (517) 482-0887 Email: gwallace@fraserlawfirm.com

Attorneys for City of Lansing

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11

GENERAL MOTORS CORP., et al.,

Debtors.

Case No. 09-50026-reg (Jointly Administered)

Hon. Robert E. Gerber

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that City of Lansing, a party-in-interest in the abovereferenced case, hereby appears in the above-referenced case by its counsel, G. Alan Wallace of Fraser Trebilcock Davis & Dunlap, P.C., such counsel hereby enter their appearance in the abovereferenced case under §1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b); and hereby requests, under Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure and §1109(b) of the Bankruptcy Court, that copies of all notice and pleadings given or filed in this case be given and served upon the following persons at the address, telephone, and facsimile number indicated:

> G. Alan Wallace Fraser Trebilcock Davis & Dunlap, P.C. 124 West Allegan Street, Suite 1000 Lansing, Michigan 48933 Telephone: (517) 377-0822 Fax: (517) 482-0887 Email: gwallace@fraserlawfirm.com

Please take further notice that, under §1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the above-referenced cases and proceedings therein.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or construed to be a waiver of the above-named party-in-interest's rights (1) to have final orders in non-core matters entered only after <u>de novo</u> review by a District Court Judge, (2) to trial by jury in any proceedings to triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, setoffs, or recoupments to which the above-referenced party-in-interest is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the above-referenced party-in-interest expressly reserves.

Respectfully Submitted,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.

Dated: June 10, 2009

By: /s/ G. Alan Wallace G. Alan Wallace (P69333) Fraser Trebilcock Davis & Dunlap, P.C. 124 West Allegan Street, Suite 1000 Lansing, Michigan 48933 Telephone: (517) 377-0822 Fax: (517) 482-0887 Email: gwallace@fraserlawfirm.com