

**HEARING DATE AND TIME: June 15, 2010 at 9:45 a.m. (Eastern Time)**  
**RESPONSE DEADLINE: June 8, 2010 at 4:00 p.m. (Eastern Time)**  
**REPLY DEADLINE: June 10, 2010 at 12:00 p.m. (Eastern Time)**

Robert T. Gibson  
*Pro Hac Vice*  
THE GIBSON LAW FIRM  
319 West Front Street  
Media, PA 19063  
Tel: 215-729-7000  
Fax: 215-695-2200

Attorney for Creditors Gibson Law Firm/George and Karen Kairis  
(Objectors in *Soders v. General Motors Corp.* class action)

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

-----X  
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)  
: :  
-----X

**NOTICE OF OBJECTION TO CLAIM OF**  
**'Settlement Agreement in Soders v. General Motors Corp. and RodaNast, P.C.'**  
**(Proof of Claim No. 44887)**  
**SUBMITTED FOR ADR RESOLUTION PURSUANT TO GENERAL ORDER M-390**  
**AND PETITION TO INTERVENE**

**PLEASE TAKE NOTICE** that on March 24, 2010, Creditors, The Gibson Law Firm and George and Karen Kairis (attorney for objectors and objectors in *Soders v. General Motors Corp.* class action), filed an Objection to Claim of 'Settlement Agreement in Soders v. General Motors Corp. and RodaNast, P.C.' (Proof of Claim No. 44887) Submitted for ADR Resolution Pursuant to General Order M-390 and Petition to Intervene (Docket No. 5369), and that a hearing to consider said Objection and Petition to Intervene will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States

Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **June 15, 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 Objection and Petition to Intervene 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](http://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](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, 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.); (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 Natalie Kuehler, Esq.); and (x) Robert Gibson, Esquire, The Gibson Law Firm, 319 West Front Street, Media, Pennsylvania 19063, so as to be received no later than **June 8, 2010 at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

**PLEASE TAKE FURTHER NOTICE** that the relief requested may be granted without a hearing if no objection is timely filed and served.

Respectfully submitted,

/s/ Robert T. Gibson  
Robert T. Gibson  
*Pro Hac Vice*  
THE GIBSON LAW FIRM  
319 West Front Street  
Media, PA 19063  
Tel: 215-729-7000  
Fax: 215-695-2200

Attorney for Creditors The Gibson Law  
Firm/George and Karen Kairis  
(Objectors in *Soders v. General Motors Corp.* class  
action)

Date: May 6, 2010

Robert T. Gibson  
*Pro Hac Vice*  
THE GIBSON LAW FIRM  
319 West Front Street  
Media, PA 19063  
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f/k/a General Motors Corp., *et al.*, : :  
Debtors. : (Jointly Administered)  
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**CERTIFICATE OF SERVICE**

ROBERT T. GIBSON, ESQUIRE, hereby certifies that a true and correct copy of the foregoing document was served upon the following persons via first-class mail:

Weil, Gotshal & Manges LLP  
(Attn: Harvey R. Miller, Esq.,  
Stephen Karotkin, Esq.,  
Joseph H. Smolinsky, Esq., and  
Pablo Falabella, Esq.)  
767 Fifth Avenue  
New York, New York 10153

General Motors, LLC  
(Attn: Lawrence S. Buonomo, Esq.)  
300 Renaissance Center  
Detroit, Michigan 48265

United States Department of the Treasury  
(Attn: Joseph Samarias, Esq.)  
1500 Pennsylvania Avenue NW, Room 2312

Motors Liquidation Company  
(Attn: Ted Stenger)  
500 Renaissance Center, Suite 1400  
Detroit, Michigan 48243

Cadwalader, Wickersham & Taft LLP  
(Attn: John J. Rapisardi, Esq.)  
One World Financial Center  
New York, New York 10281

Vedder Price, P.C.  
(Attn: Michael J. Edelman, Esq. and  
Michael L. Schein, Esq.)  
1633 Broadway, 47th Floor  
New York, New York 10019

Washington, DC 20220  
Kramer Levin Naftalis & Frankel LLP  
(Attn: Thomas Moers Mayer, Esq.,  
Amy Caton, Esq.,  
Lauren Macksoud, Esq., and  
Jennifer Sharret, Esq.)  
1177 Avenue of the Americas  
New York, New York 10036

U.S. Attorney's Office, S.D.N.Y.  
(Attn: David S. Jones, Esq. and  
Natalie Kuehler, Esq.)  
86 Chambers Street, Third Floor,  
New York, New York 10007

Carpenter, Lipps & Leland LLP  
(Attn: Jeffrey Lipps, Esq.)  
280 Plaza, Suite 1300  
280 North High Street  
Columbus, OH 43215

Office of the United States Trustee  
for the Southern District of New York  
(Attn: Diana G. Adams, Esq.)  
33 Whitehall Street, 21st Floor  
New York, New York 10004

RodaNast, P.C.  
(Attn: Joseph Roda, Esq. and  
Michelle Burkholder, Esq.)  
801 Estelle Drive  
Lancaster, PA 17601

Hartman, Underhill & Brubaker LLP  
(Attn: Christopher Underhill, Esq.)  
221 East Chestnut Street  
Lancaster, PA 17602

Respectfully submitted,

/s/ Robert T. Gibson  
Robert T. Gibson  
*Pro Hac Vice*  
THE GIBSON LAW FIRM  
319 West Front Street  
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Tel: 215-729-7000  
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