

**PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS  
HERETO TO DETERMINE WHETHER THIS OBJECTION  
AFFECTS YOUR CLAIM(S)**

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Attorneys for Debtors  
and Debtors in Possession

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

-----X  
: **Chapter 11 Case No.**  
: **09-50026 (REG)**  
: **(Jointly Administered)**  
: **Debtors.**  
: **(Jointly Administered)**  
: **(Jointly Administered)**  
: **(Jointly Administered)**  
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**NOTICE OF DEBTORS' THIRTY-FOURTH OMNIBUS OBJECTION TO CLAIMS**  
**(Claims with Insufficient Documentation)**

**PLEASE TAKE NOTICE** that on July 2, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the “**Debtors**”), filed their thirty-fourth omnibus objection to expunge certain claims (the “**Thirty-Fourth Omnibus Objection to Claims**”), and that a hearing (the “**Hearing**”) to consider the Thirty-Fourth Omnibus Objection to Claims 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 **August 6,**

**2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE THIRTY-FOURTH OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT “A” ANNEXED THERETO.**

**PLEASE TAKE FURTHER NOTICE** that any responses to the Thirty-Fourth Omnibus Objection to Claims 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, 400 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, D.C. 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.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **July 30, 2010 at 4:00 p.m. (Eastern Time)** (the "**Response Deadline**").

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Thirty-Fourth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Thirty-Fourth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
July 2, 2010

/s/ Joseph H. Smolinsky \_\_\_\_\_  
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Debtors in Possession

**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

**DEBTORS' THIRTY-FOURTH OMNIBUS OBJECTION TO CLAIMS**  
**(Claims with Insufficient Documentation)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.  
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE  
EXHIBIT ANNEXED TO THIS OBJECTION.**

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

Motors Liquidation Company (f/k/a General Motors Corporation) (“MLC”) and  
its affiliated debtors, as debtors in possession (collectively, the “Debtors”), respectfully  
represent:

## Relief Requested

1. The Debtors file this thirty-fourth omnibus objection to certain claims (the “**Thirty-Fourth Omnibus Objection to Claims**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], and this Court’s order approving the procedures relating to the filing of proofs of claim (the “**Bar Date Order**”) [Docket No. 4079], seeking entry of an order disallowing and expunging the claims listed on **Exhibit “A”** annexed hereto.<sup>1</sup>

2. The Debtors have examined the proofs of claim identified on Exhibit “A” and have made every effort to ascertain the validity of such claims. In fact, prior to the filing of this Thirty-Fourth Omnibus Objection to Claims, the Debtors sent a letter to each of the claimants listed on Exhibit “A” requesting information that would permit the Debtors to understand the basis and nature of their respective proofs of claim. To date, the Debtors have not received any response.

3. After careful review, the Debtors have determined that the proofs of claim listed under the heading “*Claims to be Disallowed and Expunged*” (collectively, the “**Claims with Insufficient Documentation**”) fail to provide sufficient documentation to ascertain the validity of such claims. Pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule

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<sup>1</sup> Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, [www.motorsliquidation.com](http://www.motorsliquidation.com). A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

3007, and the Bar Date Order, the Debtors seek entry of an order disallowing and expunging from the claims register the Claims with Insufficient Documentation. Further, the Debtors reserve all of their rights to object on any other basis to any Claims with Insufficient Documentation as to which the Court does not grant the relief requested herein.

### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

### **Background**

5. On June 1, 2009, four of the Debtors (the “**Initial Debtors**”)<sup>2</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the “**Realm/Encore Debtors**”)<sup>3</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.

6. On September 16, 2009, this Court entered an order [Docket No. 4079] establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors’ cases, including governmental units. On December 2, 2009, this Court entered an order [Docket No. 4586] establishing February 1, 2010 as the deadline for each

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<sup>2</sup> The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

<sup>3</sup> The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

person or entity to file a proof of claim in the Realm/Encore Debtors' cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim).

7. Furthermore, on October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

**The Relief Requested Should Be Approved by the Court**

8. A proof of claim *must* “set forth the facts necessary to support the claim” for it to receive the prima facie validity accorded under the Bankruptcy Rules. *In re Chain*, 255 B.R. 278, 280 (Bankr. D. Conn. 2000) (internal quotation omitted); *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988); *see Ashford v. Consol. Pioneer Mortgage*, 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995), *aff'd*, 91 F.3d 151 (9th Cir. 1996); *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

9. The Claims with Insufficient Documentation fall far short of the standard unambiguously required in the Bar Date Order. Indeed, the Bar Date Order, requires, among other things, that a proof of claim must “set forth with specificity the legal and factual basis for the alleged [c]laim [and] include supporting documentation or an explanation as to why such documentation is not available. (Bar Date Order at 2.)<sup>4</sup>

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<sup>4</sup> Notices of the Bar Date Order contained express references to this requirement.



10. The Debtors have examined the proofs of claim identified on Exhibit "A" and have determined that the proofs of claim listed under the heading "*Claims to be Disallowed and Expunged*" do not include sufficient documentation to ascertain the nature or validity of these claims. Thus, the Debtors request that the Court disallow and expunge in their entirety the Claims with Insufficient Documentation.

**Notice**

11. Notice of this Thirty-Fourth Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Third Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated April 29, 2010 [Docket No. 5670].

12. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York  
July 2, 2010

/s/ Joseph H. Smolinsky

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Attorneys for Debtors  
and Debtors in Possession

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

**ORDER GRANTING DEBTORS' THIRTY-FOURTH OMNIBUS OBJECTION TO CLAIMS**  
**(Claims with Insufficient Documentation)**

Upon the thirty-fourth omnibus objection to expunge certain claims, dated July 2, 2010 (the “**Thirty-Fourth Omnibus Objection to Claims**”),<sup>1</sup> of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order disallowing and expunging the Claims with Insufficient Documentation on the grounds that such claims fail to provide sufficient documentation to ascertain the validity of the claim, all as more fully described in the Thirty-Fourth Omnibus Objection to Claims; and due and proper notice of the Thirty-Fourth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Thirty-Fourth Omnibus

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Thirty-Fourth Omnibus Objection to Claims.

Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Thirty-Fourth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Thirty-Fourth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit “A”** annexed hereto under the heading “*Claims to be Disallowed and Expunged*” are disallowed and expunged from the claims registry; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Thirty-Fourth Omnibus Objection to Claims under the heading “*Claims to be Disallowed and Expunged*” that is not disallowed or expunged pursuant to this Order; and it is further

ORDERED that to the extent a disallowed and expunged claim is a workers’ compensation claim with respect to an employee residing or employed in any state other than the states of Alabama, Georgia, New Jersey, and Oklahoma, the disallowance of such claim shall not affect the claimant’s rights to continue receiving benefits from General Motors, LLC (f/k/a NGMCO, Inc.), the purchaser of substantially all the assets of General Motors Corporation; and it is further

ORDERED that to the extent a disallowed and expunged claim is for principal under a public debt security issued by the Debtors, the disallowance of such claim shall not affect the right of the claimant to participate in recoveries as a holder of securities under any

proof of claim filed by an indenture trustee in respect of the subject issuance; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2010

\_\_\_\_\_  
United States Bankruptcy Judge

CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
ADALBERT RINGLSTETTER 796 REEF POINT CIR NAPLES, FL 34108	3619	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
ALLSTATE INSURANCE COMPANY CLAIM 2426942112 PALM ATTN DAVID LAUGHLIN PO BOX 29500 ROANOKE, VA 24018	750	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$7,872.26 (U) \$7,872.26 (T)	Insufficient Documentation	Pgs. 1-4	
ALMA FLORMAN 200 EAST 57TH ST APT 17N NEW YORK, NY 10022	3027	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
ANDERSON, LONNIE 19456 CALDWELL ST DETROIT, MI 48234	3928	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
ANDREW DUDLEY 7740 BLACKBURN CT REYNOLDSBURG, OH 43068	3615	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
ANN B STILLMAN 65 REVERE PARK NASHVILLE, TN 37205	5007	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
ANN E CRENSHAW 6710 CRANWOOD DR FLINT, MI 48505	4611	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4	
			\$0.00 (A)			
			\$0.00 (P)			
			\$611.00 (U)			
			\$611.00 (T)			
ARNETT, TIMOTHY 10330 MAIN ST LEO, IN 46765	2278	Motors Liquidation Company	\$4,200.00 (S)	Insufficient Documentation	Pgs. 1-4	
			\$0.00 (A)			
			\$0.00 (P)			
			\$0.00 (U)			
			\$4,200.00 (T)			
BANKS, WESLEY P 613 BRIARWOOD TRL JOSHUA, TX 76058	4635	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			
BARNES, VIOLA F 2104 HALFORD ST ANDERSON, IN 46016	3354	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			
BENNY KONOSKI 14053 ELMS RD MONTROSE, MI 48457	2732	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			
BETTY M STRATTON 37 DAUNTON DR ROCHESTER, NY 14624	2706	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BETTY ROSS 20830 BETHLAWN BLVD FERNDALE, MI 48220	3838	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
BETTY STRATTON 37 DAUNTON DR ROCHESTER, NY 14624	2705	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
BODDIE-NOELL ENTERPRISES, INC 1021 NOELL LN ROCKY MOUNT, NC 27804	2767	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
BOSLEY, RALPH W 5316 SKYE DR NEW MIDDLETOWN, OH 44442	3869	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
BRAGG, DOLORES A 2407 W ENGEL RD WEST BRANCH, MI 48661	2557	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
BRENDA BLAIR PO BOX 310594 FLINT, MI 48531	4995	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					

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(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
BRENDA C BLAIR PO BOX 310594 FLINT, MI 48531	4996	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
CAMILLA VOSMEIER 2322 OAK PARK DRIVE RICHMOND, IN 47374	2408	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
CAROL BROWN 224 BOOTH AVE LARIMORE, ND 58251	394	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$503.98 (U) \$503.98 (T)	Insufficient Documentation	Pgs. 1-4	
CAROLYN BATTISTE INDIVIDUALLY AND AS ADMINISTRATOR OF THE ESTATE OF KAREEM PETERS ATTN THOMAS P WILLINGHAM, ALVIS & WILLINGHAM LLP 1400 URBAN CENTER DR SUITE 475 BIRMINGHAM, AL 35242	1535	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,000,000.00 (U) \$2,000,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
CAROLYN WALL 2796 HOPE ST HUDSONVILLE, MI 49426	3797	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
CHARLES R MARTIN 1579 HOLLY HILL DR BETHEL PARK, PA 15102	2747	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.



CLAIMS TO BE DISALLOWED AND EXPUNGED					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DANIEL STEPPKE 3268 W 50TH ST CLEVELAND, OH 44102	4183	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
DELEK AUTO CARE INC. 2876 S BUNDY DR LOS ANGELES, CA 90064	3436	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
DOLORES BRAGG 2407 W ENGEL RD WEST BRANCH, MI 48661	2558	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
DOROTHY S HAYWOOD 1508 PINEHURST DR HIGH POINT, NC 27262	4324	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
DOX, FRANK D 20 CLIFTON DR BOARDMAN, OH 44512	3031	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
DUDLEY, ANDREW R 7740 BLACKBURN CT REYNOLDSBURG, OH 43068	3614	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					

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(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (I)	Grounds For Objection	Objection Page Reference	
DUDLEY, ARIELLE P 7740 BLACKBURN CT REYNOLDSBURG, OH 43068	3613	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			
ESTATE OF DARLENE SAUER C/O ATTORNEY RUSSELL T GOLLA PO BOX 228 STEVENS POINT, WI 54481	677	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,000,000.00 (U) \$2,000,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
ESTELLA CHAPA IND AS REP OF THE ESTATE OF CESAR CHAPA DECEASED AND ANF OF CARIS CHAPA C/O WATTS GUERRA CRAFT LLP 2402 DUNLAVY ST, SUITE 300 HOUSTON, TX 77006	130	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$2,500,000.00 (U) \$2,500,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
EWING W EGNER JR. 20497 BOURASSA AVE BROWNSTOWN TWP, MI 48183	3837	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			
FLOYD K ABRAHAMSON & VERA L ABRAHAMSON 1250 WINSOR DR #111 BROOKINGS, SD 57006	3937	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
			Unliquidated			
FREDERICK G MILES 44 DARTHMOUTH ST BUFFALO, NY 14215	963	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$12,000.00 (U) \$12,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
			Unliquidated			

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (I)	Grounds For Objection	Objection Page Reference	
GAMBLE, BARBARA J 435 IRWIN AVE PONTIAC, MI 48341	4871	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4	
			\$0.00 (A)			
			\$0.00 (P)			
			\$1,500,000.00 (U)			
			\$1,500,000.00 (T)			
Unliquidated						
GARY COLBURN 639 NOTRE DAME AVE YOUNGSTOWN, OH 44515	4520	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
GEORGE DAVID SHERICK 2030 CHESTER BLVD #15B RICHMOND, IN 47324	3910	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
GEORGE F SEYK LIANE H SEYK 1451 LITTLE MOOSE LN NORTHBROOK, IL 60062	4192	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
GRAHAM, JAMES H 240 LISA CT BOILING SPRINGS, SC 29316	3953	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
GRIMMWAY FARMS 6900 MOUNTAIN VIEW RD BAKERSFIELD, CA 93307	3600	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pgs. 1-4	
			\$0.00 (A)			
			\$0.00 (P)			
			\$6,000.00 (U)			
			\$6,000.00 (T)			

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
HAYES K LEMMOND & ETHEL N LEMMOND JTWROS 1602 PENN ROAD SW HARTSELLE, AL 35640	2879	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
HAYS, MICHAEL R 5164 JIMTOWN RD E PALESTINE, OH 44413	3875	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
IVY, JUANITA 18075 MAINE ST DETROIT, MI 48234	5056	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
J COLVIN & A COLVIN CO-TTEE COLVIN REVOCABLE TRUST U/T/A DTD 07/07/1985 2722 CIRCLE DR NEWPORT BEACH, CA 92663	4850	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$25,000.00 (U) \$25,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
Unliquidated						
JAMES KELLMANN 18353 S FRONTIER RD PEEPLER VALLEY, AZ 86332	3627	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
JANE POZNAK 10 SMITH MANOR DRIVE UNIT 406 WEST ORANGE, NJ 07052	2470	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pgs. 1-4	

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CLAIMS TO BE DISALLOWED AND EXPUNGED					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
JARVIE, FLORENCE E 749 PUTNAM AVE LAWRENCEVILLE, NJ 08648	4771	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
JEAN T ROSSI 2030 CHESTER BLVD RICHMOND, IN 47374	2406	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
JEFF & ELIZABETH LECROY WATTS GUERRA CRAFT LLP 2402 DUNLAVY ST SUITE 300 HOUSTON, TX 77006	122	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,000,000.00 (U) \$3,000,000.00 (T)	Insufficient Documentation	Pgs. 1-4
JOHN P OLSON ATTN MICHAEL C SHEPARD THE SHEPARD LAW FIRM PC 10 HIGH ST BOSTON, MA 02110	1600	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$250,000.00 (U) \$250,000.00 (T)	Insufficient Documentation	Pgs. 1-4
KENNETH SCHUTTE 2796 HOPE ST HUDSONVILLE, MI 49426	3798	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					

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CLAIMS TO BE DISALLOWED AND EXPUNGED					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
KONOSKI, BENNY E 14053 ELMS RD MONTROSE, MI 48457	2731	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
LARRY J MINAR 9249 BAUMGART RD EVANSVILLE, IN 47725 UNITED STATES OF AMERICA	4465	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
LINDA SZEJNA C/O ATTORNEY RUSSELL T GOLLA PO BOX 228 STEVENS POINT, WI 54481	655	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$16,000,000.00 (U) \$16,000,000.00 (T)	Insufficient Documentation	Pgs. 1-4
Unliquidated					
MARY E DOWLER 201 E VINE ST LIBERTY, IN 47353	2409	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
MARY F HULL 1220 DEPOT 406 GLENVIEW, IL 60025	2889	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pgs. 1-4
Unliquidated					
MCCOLLUM, ANNA E 2417 YOUNGSTOWN LOCKPORT RD RANSOMVILLE, NY 14131	3606	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
MICHAEL HAYS 5164 JIMTOWN RD E PALESTINE, OH 44413	3874	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
MILLER, WALTER H 8840 CR 622A BUSHNELL, FL 33513	4895	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
MONTERRAT TREJO VELASQUEZ ATTN JERRY GUERRA LAW OFFICES OF JERRY GUERRA P C 555 N CARANCAHUA SUITE 200 CORPUS CHRISTI, TX 78478	1051	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,500,000.00 (U) \$3,500,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
MORAN, VERA WILLIAMS RR 1 BOX 121A HAMBLETON, WV 26269	4345	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$240,000.00 (P) \$0.00 (U) \$240,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
MSB FBO ROBERT POZNAK & JANE POZNAK JT TEN 10 SMITH MANOR BLVD UNIT 406 WEST ORANGE, NJ 07052	2469	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,000.00 (U) \$15,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
NANCY R MORRISON 126 WELLESLEY DR NEWPORT NEWS, VA 23606	3833	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
NORMAN & SONDRAY KAY JT-TEN 7301 COVENTRY AVE. APT 502 MELROSE PARK, PA 19027	3912	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
NOWAK, CLEMENTINE C 2129 HIGHWAY 33 HAMILTON, NJ 08690	2885	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
PATRICIA E FANNING 628 BRYANT AVE TEANECK, NJ 07666	4879	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$225.00 (U) \$225.00 (T)	Insufficient Documentation	Pgs. 1-4	Unliquidated
PATRICIA HAWKINS 1710 ARTHUR DR NW WARREN, OH 44485	3873	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
PAUL GIBBY 344 NO 1115TH ST APT 3E POCATELLO, ID 83201	2940	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
RAGSDALE RAYMOND LEE RAGSDALE, RAYMOND LEE 4528 SOUTH SHERIDAN SUITE 103 TULSA, OK 74145	3890	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T)	Insufficient Documentation	Pgs. 1-4	Unliquidated

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
RALPH BOSLEY 5316 SKYE DR NEW MIDDLETOWN, OH 44442	3870	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
REDRICK, GLENDA D 1007 ORLO DR NW WARREN, OH 44485	3879	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
RICHARD C FIRSCHING 941 OLD HICKORY RD PITTSBURGH, PA 15243	2749	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
RICHTER RUTH E 4741 STATE ROAD 54 W SPRINGVILLE, IN 47462	4883	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
RINGLSTETTER, ADALBERT B 796 REEF POINT CIR NAPLES, FL 34108	3618	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	Unliquidated
ROBERT W SAWYER CO- MARGARET A SAWYER CO- 1857 WILDWOOD RD TOLEDO, OH 43614	3903	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,005.00 (U) \$5,005.00 (T)	Insufficient Documentation	Pgs. 1-4	

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
ROGER NEWELL 5952 PHELPS CT OTTER LAKE, MI 48464	1906	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
RON F ROQUE AND PATRICIA ROQUE CO TRUSTESS FOR RON ROQUE TRUST 5509 PATTIE LN LOUISVILLE, KY 40219	4986	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
ROSS, BETTY L 20830 BETHLAWN BLVD FERNDALE, MI 48220	3839	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
ROY, JOHN R 110 WINDERMERE RD LOCKPORT, NY 14094	4716	Motors Liquidation Company	\$468.69 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$468.69 (T)	Insufficient Documentation	Pgs. 1-4	
RUDOLPH COHEN AND GENIA B TISHMAN JTWROS 3109 OLD POST DR BALTIMORE, MD 21208	1770	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
SCHNEIDER DAVID SCHNEIDER, DAVID ELIAS SCHNEIDER 49 W PROSPECT ST E BRUNSWICK, NJ 08816	2347	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,000,000.00 (U) \$1,000,000.00 (T)	Insufficient Documentation	Pgs. 1-4	

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CLAIMS TO BE DISALLOWED AND EXPUNGED					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
SCHUTTE, KENNETH J 2796 HOPE ST HUDSONVILLE, MI 49426	3799	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
SLEDZ, MARIA 3529 WILLIAMSON RD SAGINAW, MI 48601	3930	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
SLEDZ, MIKOLAJ 3529 WILLIAMSON RD SAGINAW, MI 48601	3929	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
STEPHEN CLAY, SR. 203 FULTON ST. BROOKHAVEN, MS 39601	4174	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
STEPHEN P KAPLAN 1214 BOBWHITE COURT PUNTA GORDA, FL 33950	5300	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
STEPPKE, DANIEL H 3268 W 50TH ST CLEVELAND, OH 44102	4184	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					

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CLAIMS TO BE DISALLOWED AND EXPUNGED					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
THERESA MARTIN 1579 HOLLY HILL DR BETHEL PARK, PA 15102	2748	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
THOMAS P WEBB 21 HIGHLAND PLACE MAPLEWOOD, NJ 07040	3939	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
TOWNSEND, JAMIE E 3621 BROWNELL BOULEVARD FLINT, MI 48504	4617	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
WALTER H GUTMAN 1200 KING ST APT 455 RYE BROOK, NY 10573	4136	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
WESSINGER JAMES B MD PC 4277 OKEMOS RD STE 100 OKEMOS, MI 48864	2926	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4
Unliquidated					
WIGGINS, JOHN E 101 STOCKDALE ST FLINT, MI 48503	1811	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pgs. 1-4

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CLAIMS TO BE DISALLOWED AND EXPUNGED						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	
WILLIAM A KRAUS CHRISTINA E KRAUS 1585 HOLLY HILL DR BETHEL PARK, PA 15102	2762	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
WILLIAM MCKEE 44 SOUTH ST THREE RIVERS, MA 01080	3841	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
WILSON JR, HERBERT 525 LAZY WILLOW LN LAWRENCEVILLE, GA 30044	2721	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-4	
Unliquidated						
WYLLA RAMSEY ATTN: E TODD TRACY THE TRACY FIRM 5473 BLAIR RD, SUITE 200 DALLAS, TX 75231	16	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,000,000.00 (U) \$5,000,000.00 (T)	Insufficient Documentation	Pgs. 1-4	
<b>Claims to be Disallowed and Expunged Totals</b>	<b>99</b>		<b>\$4,668.69 (S)</b> <b>\$0.00 (A)</b> <b>\$240,000.00 (P)</b> <b>\$36,912,217.24 (U)</b> <b>\$37,156,885.93 (T)</b>			

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