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August 6, 2010

BY E-MAIL AND ECF

Hon. Robert E. Gerber  
United States Bankruptcy Court  
One Bowling Green  
Room 627  
New York, NY 10004

Re: *In re: Motors Liquidation Company, et. al* (No. 09-50026) /  
Motion of the Official Committee of Unsecured Creditors  
For an Order Pursuant to Bankruptcy Rule 2004 [Docket No. 6383]

Dear Judge Gerber:

This firm represents the Manville Personal Injury Settlement Trust (the "Manville Trust") and the Claims Resolution Management Corporation ("CRMC") in connection with the Objection that the Manville Trust and CRMC filed to the above-referenced Motion.<sup>1</sup> The Motion is scheduled for hearing on August 9, 2010, at 9:45 a.m.

The Manville Trust and CRMC's Objection indicated that Bates White, an advisor to the Official Committee of Unsecured Creditors (the "Committee"), had submitted an application for the licensing and distribution of certain Manville Trust data. *See* Objection, at ¶¶31-33. As described in the Objection, the Manville Trust's policies

<sup>1</sup> The Motion is Docket No. 6383. The Objection of the Manville Trust and CRMC is Docket No. 6484. Certain factual background relevant to the Objection is set forth in the Declaration of David T. Austern, which is Docket No. 6485.

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require that it obtain the concurrence of certain constituencies<sup>2</sup> before approving any such application. At the time the Committee filed its Reply to the Objection on August 5, 2010, the Manville Trust had not received a response from either constituency.

We write to advise the Court that the Manville Trust and CRMC have learned that one of the constituencies does not consent to the licensing and distribution of Manville Trust data to Bates White. Accordingly, the Manville Trust and CRMC today advised Bates White that its application has been denied.

The Manville Trust and CRMC continue to object to the Motion.

Respectfully submitted,

*/s/ Emily A. Stubbs*

Emily A. Stubbs

cc: Interested Counsel (by e-mail)  
All Parties Receiving Electronic Notice (via ECF)

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<sup>2</sup> The constituencies are the Selected Counsel for the Beneficiaries and the Legal Representative of Future Claimants.