

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

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

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

NOTICE OF DEBTORS' EIGHTY-FIFTH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

PLEASE TAKE NOTICE that on September 17, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "**Debtors**"), filed their eighty-fifth omnibus objection to expunge certain claims (the "**Eighty-Fifth Omnibus Objection to Claims**"), and that a hearing (the "**Hearing**") to consider the Eighty-Fifth 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

October 26, 2010 at 9:45 a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE EIGHTY-FIFTH 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 Eighty-Fifth 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-399 (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 CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 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., Robert Schmidt, 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: Tracy Hope Davis, 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 **October 19, 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 Eighty-Fifth 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 Eighty-Fifth 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
September 17, 2010

/s/ Joseph H. Smolinsky
Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

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

DEBTORS' EIGHTY-FIFTH 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 eighty-fifth omnibus objection to certain claims (the “**Eighty-Fifth 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.¹

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 Eighty-Fifth 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 3007, and the Bar Date Order, the Debtors seek entry of an order disallowing and expunging

¹ 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. 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.

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**”)² 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**”)³ 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 person or entity to file a proof of claim in the Realm/Encore Debtors’ cases (except

² 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.).

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

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 Ord. at 2.)⁴

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*

⁴ Notices of the Bar Date Order contained express references to this requirement.

and Expunged' do not include sufficient documentation to ascertain the nature or validity of these claims. A reasonable opportunity was provided to each claimant to rectify the deficiencies. Thus, the Debtors request that the Court disallow and expunge in their entirety the Claims with Insufficient Documentation.

Notice

11. Notice of this Eighty-Fifth Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Fourth 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 August 24, 2010 [Docket No. 6750]. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

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
September 17, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

CLAIMS TO BE DISALLOWED AND EXPUNGED

| Name and Address of Claimant | Claim # | Debtor | Claim Amount and Priority (1) | Grounds For Objection | Objection Page Reference |
|--|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| ALBERT MAISTO AND MARY JEAN MAISTO 1810 OUTLOOK DR VERONA, PA 15147 | 10664 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$540.23 (U) | | |
| | | | \$540.23 (T) | | |
| AMERICAN INFOSOURCE LP AS AGENT FOR T MOBILE/T-MOBILE USA INC PO BOX 248848 OKLAHOMA CITY, OK 73124 UNITED STATES OF AMERICA | 5541 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$14,658.26 (U) | | |
| | | | \$14,658.26 (T) | | |
| ARNOLD HUTTNER TTEE FBO ARNOLD HUTTNER U/A/D 08-04-2005 5424 AYLESBORO AVE. PITTSBURGH, PA 15217 | 2481 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$21,000.00 (U) | | |
| | | | \$21,000.00 (T) | | |
| BETTY J COLE TTEE 2505 NW A ST RICHMOND, IN 47374 UNITED STATES OF AMERICA | 10248 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| BEY, EDWARD F 6070 FETTRO RD HILLSBORO, OH 45133 | 19121 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|----------------------------------|--|-------------------------------|--------------------------|
| BLACK, CANDY S LOT 139 94 JAMISON ROAD NORTHWEST WSHNGTN CT HS, OH 43160 | 19363 | Motors Liquidation Company | \$0.00 (S) \$42,000.00 (A) \$0.00 (P) \$0.00 (U) \$42,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| BLACK, ROBERT C LOT 202 94 JAMISON ROAD NORTHWEST WSHNGTN CT HS, OH 43160 | 19362 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$44,000.00 (P) \$0.00 (U) \$44,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| BREDENS LAWN MAINTENANCE BREDENS LAWN PO BOX 75286 SALEM, MI 48175 | 61975 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,863.00 (U) \$1,863.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| BRYANT, ERNEST L 1709 SOUTH 9TH STREET MONROE, LA 71202 | 3726 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$20,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| CALVIN JACKSON APT 416 9233 INDEPENDENCE BOULEVARD CLEVELAND, OH 44130 | 11254 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| CAMPBELL, ROBERTA W 31 TREMBLE AVE APT 301 CAMPBELL, OH 44405 | 16387 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| CARRANZA, SANTIAGO E 1518 AMANDA ST APT 106 SAN ANTONIO, TX 78210 | 12387 | Motors Liquidation Company | \$51,100.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$400.00 (U) | | |
| | | | \$51,500.00 (T) | | |
| CELESTINO J MARSOCCI & SUSAN MARSOCCI JT TEN 80 WOOD COVE DRIVE COVENTRY, RI 02816 | 9253 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$3,933.72 (P) | | |
| | | | \$0.00 (U) | | |
| | | | \$3,933.72 (T) | | |
| CENTERPOINT ASSOCIATES LLC C/O EARLE I ERMAN ESQ ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN PC 400 GALLERIA OFFICENTRE STE 444 SOUTHFIELD, MI 48034 | 22624 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (S) | | |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$4,003.20 (U) | | |
| CHALRES G RECKARD 801 SUNSHINE RUN ARNOLD PARK, IA 51331 | 18991 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$4,003.20 (U) | | |
| | | | \$4,003.20 (T) | | |
| CHRISTIAN WIDMANN CHEMIN DE LA GRANGETTE 5D LAUSANNE 1010 SWITZERLAND , SWITZERLAND | 65116 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$49.80 (U) | | |
| | | | \$49.80 (T) | | |

(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 |
|---|---------|----------------------------------|--|-------------------------------|--------------------------|
| CLARISSA BARMORE 56 RESERVATION ST BUFFALO, NY 14207 | 10669 | Motors Liquidation Company | \$15,155.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$15,155.00 (T) Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| CLAYTON ENGLE 3540 CAUSEWAY DR NE LOWELL, MI 49331 | 2477 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| COOK, BLAIR O 6401 PARK RD LEAVITTSBURG, OH 44430 | 2486 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| CUELLAR, NANCY 104 ELM ST CIBOLO, TX 78108 | 2467 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| DAVIS JR, HAROLD E APT 123 1165 COLONY DRIVE WESTERVILLE, OH 43081 | 1814 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |

(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 |
|--|---------|----------------------------------|--|-------------------------------|--------------------------|
| DENOON, GEORGE R (DECEASED) JUDITH DENOON 1112 S VALLEY RD OLATHE, KS 66061 | 15601 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| DONALD OWENS 753 N COUNTY ROAD 25A TROY, OH 45373 | 1782 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| DONALD STARK 1707 IRENE AVE NE WARREN, OH 44483 | 14841 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$30.00 (U) \$30.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| DOROTHY BENNETT 3019 CENTER ST FLORA, MS 39071 UNITED STATES OF AMERICA | 22189 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| EDWARD BEY 6070 FETTRO RD HILLSBORO, OH 45133 | 19120 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| 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 |
|--|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| EDWARD F & JULIANN M DANIELS 11 E 32ND ST ATLANTIC, IA 50022 | 4967 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$31,363.00 (U) | | |
| | | | \$31,363.00 (T) | | |
| | | | Unliquidated | | |
| ELLEN WOLFF BROND 11 HOLMSKOV 6430 NORDBORG DENMARK , DENMARK | 44768 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$16,996.00 (U) | | |
| | | | \$16,996.00 (T) | | |
| | | | Unliquidated | | |
| ENGLE, CLAYTON D 3540 CAUSEWAY DR NE LOWELL, MI 49331 | 2478 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| ETHEN, MARK E 2821 RUGER AVE JANESVILLE, WI 53545 | 10564 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| FLESSAS, DINOS 22617 WATERBURY ST WOODLAND HILLS, CA 91364 | 15819 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|--|--|-------------------------------|--------------------------|
| FRAZIER, CARLA A 422 MAPLE ST CHARLOTTE, MI 48813 | 10518 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| FRED B MCANDREW 1240 E COLDWATER RD FLINT, MI 48505 | 69805 | Environmental Corporate Remediation Company, Inc. | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$510,000.00 (U) \$510,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| FRITZ VORBECK MOERSENBROICHER WEG 31 DÜSSELDORF 40470, GERMANY , GERMANY | 15231 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,430.00 (U) \$15,430.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| GLEN R COLE TTEE 2505 NW A ST RICHMOND, IN 47374 UNITED STATES OF AMERICA | 10247 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| GOKEY, RICHARD A 39 SCOTT DR MALONE, NY 12953 | 17929 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|---|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| HAROLD B LEONARD HC 60 BOX 185 CHECOTAH, OK 74426 | 20965 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$7,500.00 (U) | | |
| | | | \$7,500.00 (T) | | |
| Unliquidated | | | | | |
| HAROLD ORNER 130 ERVIN AVE LINWOOD, PA 19061 | 2299 | Moters Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | | | |
| Unliquidated | | | | | |
| HARRY J HOWARD 73 OLD TOWN PARK RD. NEW MILFORD, CT 06776 | 1898 | Moters Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | | | |
| Unliquidated | | | | | |
| HELEN D LEONARD HC 60 BOX 185 CHECOTAH, OK 74426 | 20966 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$2,500.00 (U) | | |
| | | | \$2,500.00 (T) | | |
| Unliquidated | | | | | |
| HERBERT E MCCORMICK & LINDA S MCCORMICK JT TEN 17228 COYOTE DR SPRINGVILLE, CA 93265 | 32865 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$25,000.00 (U) | | |
| | | | \$25,000.00 (T) | | |
| Unliquidated | | | | | |
| HERMAN, ADAM J 10860 KILMANAGH RD SEBEWAING, MI 48759 | 1871 | Moters Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | | | |
| 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 |
|--|---------|----------------------------------|--|-------------------------------|--------------------------|
| HICKS, STEPHEN C 11419 LAKE SHORE DR CHARLEVOIX, MI 49720 | 1788 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| HOWARD, ULES 313 EDWARD AVE LEHIGH ACRES, FL 33936 | 12973 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| IKARD, CALVIN 504 GREEN COVE RD SE HUNTSVILLE, AL 35803 | 4472 | Motors Liquidation Company | \$40,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$40,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| JACKSON, CALVIN A APT 416 9233 INDEPENDENCE BOULEVARD CLEVELAND, OH 44130 | 11253 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| JAMES A BOLTZ AND JACQUELINE A DECKER JTWROS 754 WHITESAIL DRIVE SCHAUMBURG, IL 60194 | 11740 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |

(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 |
|--|---------|----------------------------------|--|-------------------------------|--------------------------|
| JAMES LORIA 4452 REID RD SWARTZ CREEK, MI 48473 | 11258 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| JAMES R WIGGINTON TOD W NIELSEN V NIELSEN, C WIGGINTON SUBJECT TO STA RULES PO BOX 397 NORDMAN, ID 83848 | 10196 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$33,230.34 (U) \$33,230.34 (T) | Insufficient Documentation | Pgs. 1-5 |
| JARAMILLO MAYELA 5537 PENTAIL CIR TAMPA, FL 33625 | 11378 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| JOHN HALBERSTADT PHD 80 GARFIELD ST CAMBRIDGE, MA 02138 | 7437 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$20,000.00 (U) \$20,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| JOINER, MATILDA PO BOX 603 RED OAK, GA 30272 | 7300 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$17,000.00 (U) \$17,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| JUDITH DENOON 1112 S VALLEY RD OLATHE, KS 66061 | 15600 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| KENNEDY, JAMES K 7971 N NC HIGHWAY 150 LEXINGTON, NC 27295 | 23368 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| KENT Q KREH 260 CARLYLE LAKE DR CREVE COEUR, MO 63141 | 10516 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| KORYCKI, VICTOR L CHRISTINE K KORYCKI 7405 IRONGATE RD CANTON, MI 48187 | 11409 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| LORIA, JAMES C 4452 REID RD SWARTZ CREEK, MI 48473 | 11257 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| MABEL POIRIER 2404 AMANDA LN SEVIERVILLE, TN 37876 | 10505 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|--|-------------------------------|-------------------------------|--------------------------|
| MAE STARK 1707 IRENE AVE NE WARREN, OH 44483 | 14842 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$40.00 (U) | | |
| | | | \$40.00 (T) | | |
| MARIA MERCADO 449 ROADRUNNER DR PATTERSON, CA 95363 | 11864 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$20,000,000.00 (U) | | |
| | | | \$20,000,000.00 (T) | | |
| MARJORIE F LOVEJOY 781 DORSET AVE YPSILANTI, MI 48198 | 70114 | Environmental Corporate Remediation Company, Inc. | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$25,000.00 (U) | | |
| | | | \$25,000.00 (T) | | |
| MARK ETHEN 2821 RUGER AVE JANESVILLE, WI 53545 | 10563 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$5,000.00 (U) | | |
| | | | \$5,000.00 (T) | | |
| MARY R RECKARD 801 SUNSHINE RUN ARNOLDS PARK, IA 51331 | 18992 | Moters Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$5,846.46 (U) | | |
| | | | \$5,846.46 (T) | | |
| MAUS, WILLIAM J 649 CEDAR DRIVE CORTLAND, OH 44410 | 11059 | Moters Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | | | |
| | | | 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 |
|--|---------|----------------------------------|--|-------------------------------|--------------------------|
| MC DONALD, ROBERT J 7415 SCIOTO PKWY POWELL, OH 43065 | 11161 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| MEI-YUN HSU YEH 878 TOWNE CENTER DR POMONA, CA 91767 | 4841 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$210,989.80 (U) \$210,989.80 (T) | Insufficient Documentation | Pgs. 1-5 |
| MICHALINE OSAR 5730 ONAWAY OVAL PARMA, OH 44130 | 11061 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| MOORE, WILLIAM E 2830 BECK ST SE WARREN, OH 44484 | 16578 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| MRS VERA SCHNEIDER, TOD JASON SCHNEIDER, JONATHON SCHNEIDER & LIANE DISTEFANO SUBJECT STA RULES 61-19 76TH ST MIDDLE VLG, NY 11379 | 14661 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |

(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 |
|---|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| ORNER, HAROLD R 130 ERVIN AVE LINWOOD, PA 19061 | 2298 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| PARIS KATHY FISHER DBA PARIS CONSULTING 1112 N GALE RD DAVISON, MI 48423 | 2002 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| PAUL UTZ 2017 HOMESITE DR DAYTON, OH 45414 | 16853 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| PISZCZEK, KAREN LYNN 1738 LAKEWOOD CIR LAPEER, MI 48446 | 10780 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| Unliquidated | | | | | |
| POIRIER, MABEL A 2404 AMANDA LN SEVIERVILLE, TN 37876 | 10506 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| 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 |
|--|---------|----------------------------------|--|-------------------------------|--------------------------|
| POIRIER, RAYMOND N 2404 AMANDA LN SEVIERVILLE, TN 37876 | 10507 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| POWE, JOSEPH W 322 S 30TH ST SAGINAW, MI 48601 | 14286 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| PRICE, JONI 3697 SHOCK RD BEAVERTON, MI 48612 | 1970 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| RITA MONELLI 5100 S CONVENT LANE #309 PHILADEPHIA, PA 19114 | 10668 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$30,000.00 (U) \$30,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| ROBERT A AMATO 2580 S OCEAN BLVD PALM BEACH, FL 33480 | 11040 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |

(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 |
|--|---------|----------------------------|--|----------------------------|--------------------------|
| ROSIE DANTZLER 6345 WILLENA DRIVE MT MORRIS, MI 48458 | 10362 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| SANDRA MARYLES SCHULTZ C/O MARYLES 2955 NORTH SHORE CHICAGO, IL 60645 | 16011 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| SIDNEY/LEONA RESNICK 410 RIDGE AVE KENNETT SQUARE, PA 19348 | 15364 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$9,859.00 (P) \$0.00 (U) \$9,859.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| SIMS II, SAM 2330 BOWSER AVE APT 112 FORT WAYNE, IN 46803 | 10666 | Motors Liquidation Company | \$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| SIMS, KATHERINE 669 6TH ST SW WARREN, OH 44485 | 2487 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|----------------------------|--|----------------------------|--------------------------|
| STACHURA, GREGORY P 67 BARBARA PL CHEEKTOWAGA, NY 14225 | 12020 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| SYLVIA RILEY 760 BROWN ST AKRON, OH 44311 | 14403 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| TAIKOWSKI, CYNTHIA 191 WOODLAWN AVE PITTSFIELD, MA 01201 | 4852 | Motors Liquidation Company | \$1,000.00 (S) \$0.00 (A) \$6,000.00 (P) \$0.00 (U) \$7,000.00 (T) | Insufficient Documentation | Pgs. 1-5 |
| THEODORE WEST 1370 LARCHMONT RD CLEVELAND, OH 44110 | 10190 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| THOMAS, ROBERT K 2812 CONOWOODS DR SPRINGFIELD, OH 45503 | 14309 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|--|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| TRUSTEES OF THE SCREEN ACTORS GUILD- PRODUCER PENSION & HEALTH PLANS 3601 WEST OLIVE AVENUE BURBANK, CA 91510 | 1039 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| VICTORIA FOX ATTN DERRICK GOOD THURMAN LAW FIRM PO BOX 800 HILLSBORO, MO 63050 | 20972 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$12,000,000.00 (U) | | |
| | | | \$12,000,000.00 (T) | | |
| WALKER, RODNEY B 3326 SOUTHFIELD CT SAGINAW, MI 48601 | 11153 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | Unliquidated | | |
| WALLACE J MATTSON 2196 CARACAS CT FT MEYERS, FL 33907 | 63342 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$6,969.00 (U) | | |
| | | | \$6,969.00 (T) | | |
| WEBSTER, ALICE R 544 S 22ND ST SAGINAW, MI 48601 | 1705 | Motors Liquidation Company | | Insufficient Documentation | Pgs. 1-5 |
| | | | 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 |
|---|---------|----------------------------------|-------------------------------|-------------------------------|--------------------------|
| WILLIAM A BILLMAN TOD ET AL 20945 OTERO AVE HASTINGS, MN 55033 | 49609 | Motors Liquidation Company | \$25,000.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$0.00 (U) | | |
| | | | \$25,000.00 (T) | | |
| WILLIAM A PEARSON 447 W LIBERTY ST HUBBARD, OH 44425 | 13693 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$10,000.00 (U) | | |
| | | | \$10,000.00 (T) | | |
| WILLIAM CARPENTER JR 13124 N WEBSTER RD CLIO, MI 48420 | 1785 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (S) | | |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$9,250.00 (U) | | |
| WILLIAM NORBERG 290 WESTGATE ROAD N MT PROSPECT, IL 60056 | 9526 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$9,250.00 (U) | | |
| | | | \$9,250.00 (T) | | |
| WILLIAM R WRIGHT 2318 N FLORA AVE PEORIA, IL 61604 | 16052 | Motors Liquidation Company | \$0.00 (S) | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$10,000.00 (U) | | |
| | | | \$10,000.00 (T) | | |
| ZIMMERMAN, RICHARD D PO BOX 171 NEWTON FALLS, OH 44444 | 12791 | Motors Liquidation Company | Unliquidated | Insufficient Documentation | Pgs. 1-5 |
| | | | \$0.00 (S) | | |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$10,000.00 (U) | | |
| | | | Unliquidated | | |
| | | | \$0.00 (S) | | |
| | | | \$0.00 (A) | | |
| | | | \$0.00 (P) | | |
| | | | \$10,000.00 (U) | | |

(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 |
|---|---------|--------|-------------------------------|-----------------------|--------------------------|
| <i>CLAIMS TO BE DISALLOWED AND EXPUNGED</i> | 100 | | \$132,255.00 (S) | | |
| | | | \$42,000.00 (A) | | |
| | | | \$63,792.72 (P) | | |
| | | | \$33,114,659.09 (U) | | |
| | | | \$33,352,706.81 (T) | | |

(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.

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' EIGHTY-FIFTH OMNIBUS OBJECTION TO CLAIMS
(Claims with Insufficient Documentation)

Upon the eighty-fifth omnibus objection to expunge certain claims, dated September 17, 2010 (the “**Eighty-Fifth Omnibus Objection to Claims**”),¹ 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 Eighty-Fifth Omnibus Objection to Claims; and due and proper notice of the Eighty-Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Eighty-Fifth Omnibus Objection to Claims.

Court having found and determined that the relief sought in the Eighty-Fifth Omnibus 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 Eighty-Fifth 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 Eighty-Fifth 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”** (the “**Order Exhibit**”) 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, if applicable, the Eighty-Fifth Omnibus Objection to Claims is adjourned with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Adjourned*” (the “**Adjourned Claims**”) to the date indicated on the Order Exhibit, subject to further adjournments (such actual hearing date, the “**Adjourned Hearing Date**”), and the Debtors’ response deadline with respect to the Adjourned Claims shall be 12:00 noon (Eastern Time) on the date that is three (3) business days before the Adjourned Hearing Date; and it is further

ORDERED that, if applicable, the Eighty-Fifth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Objection Withdrawn*”; and it is further

ORDERED that, if applicable, the Eighty-Fifth Omnibus Objection to Claims is withdrawn with respect to the claims listed on the Order Exhibit annexed hereto under the heading “*Claim Withdrawn*” as those claims have been withdrawn by the corresponding claimant; 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 Eighty-Fifth 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