

**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  
: **Chapter 11 Case No.**  
: **09-50026 (REG)**  
: **(Jointly Administered)**  
: **Debtors.**  
:   
:   
-----X

**NOTICE OF DEBTORS' 105<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS**  
**(Claims with Insufficient Documentation)**

**PLEASE TAKE NOTICE** that on September 23, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the “**Debtors**”), filed their 105th omnibus objection to expunge certain claims (the “**105th Omnibus Objection to Claims**”), and that a hearing (the “**Hearing**”) to consider the 105th 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 105TH 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 105th 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](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 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 105th 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 105th 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 23, 2010

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

WEIL, GOTSHAL & MANGES LLP  
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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

**DEBTORS' 105<sup>TH</sup> 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 105th omnibus objection to certain claims (the “**105th 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 105th 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 from the claims register the Claims with Insufficient Documentation. Further, the Debtors

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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.

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 person or entity to file a proof of claim in the Realm/Encore Debtors’ cases (except

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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.

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.)<sup>4</sup>

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*

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<sup>4</sup> 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 105th 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 23, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller  
Stephen Karotkin  
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WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
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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
ANNA J BENNINGTON 552 WHISPER LN XENIA, OH 45385	15609	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
AUSTIN, JOANN 101 BILLINGS DR EDINBORO, PA 16412	2906	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
BABB, ILENE F 3327 N 57TH ST MILWAUKEE, WI 53216	13923	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
BATCHELOR, FLORA B 672 REN WALK STONE MOUNTAIN, GA 30087	2927	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
BELL, RHUETTA 201 W BIG BEAVER RD STE 600 TROY, MI 48084	19111	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
BENTFIELD, THERESA J 395 W BROWN ST APT 303 BEAVERTON, MI 48612	1706	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BETTY S POWELL 311 HOLLENCAMP AVE DAYTON, OH 45427	13935	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BLUM, ROBERT L 6414 BACHMAN LN GOODRICH, MI 48438	2198	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BOLYARD, JOHN 8855 COLLINS AVE APT 2C SURFSIDE, FL 33154	16140	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
BRENNAN, NOHORA 12205 GOSHEN RD LOT 215 SALEM, OH 44460	18224	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
BRIMMAGE, ELBERT G PO BOX 622 WASHINGTON, NC 27889	2768	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
BULLOCK, SUSAN M 41352 NORTHWIND DR U#19 B#3 CANTON, MI 48188	22086	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CALCATERRA, ANGELO C 16964 DRIFTWOOD DR MACOMB, MI 48042	15589	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CHARLES WRIGHT 2344 LAWNSDALE AVE COLUMBUS, OH 43207	15304	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CHESLA, SANDRA G 6135 GLOUCESTER DR CANTON, MI 48187	2903	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			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
CHRISTIE SCISSUM 1107 RANDALL ST. GADSDEN, AL 35901	4921	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CHRISTINA A USSAT 11887 S WOLF CREEK PIKE BROOKVILLE, OH 45309	14298	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CORNELL SLAUGHTER 1403 COLLIER ST JACKSON, MS 39213	15989	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CRKVENAC, THOMAS J 5 LONGSPUR DR WILMINGTON, DE 19808	17707	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
CUSTER, DIANA M 126 JOE WHEELER ST ANGOLA, IN 46703	16588	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			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
DANCY, MARY J 1436 ROE HUNT RD  LAUREL SPRINGS, NC 28644	13299	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
DANIEL E ALLEN 3012 BULAH AVE  KETTERING, OH 45429	14297	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
DARRELL ANDERSON 3232 LIV MOOR DR  COLUMBUS, OH 43227	14291	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
DARYL KOLAR RD3 BOX 364  RUFFS DALE, PA 15679	13675	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
DE LOREAN, SALLY PO BOX 3  FAR HILLS, NJ 07931	22121	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
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
EARNEST SUMMERS 2253 FREEDOM AVE MIMS, FL 32754	15594	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ELLIOTT, JOY M 18 PLYMOUTH LANE MANCHESTER, CT 06040	2909	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
ESPINOZA, ERNESTINA E PO BOX 100901 SAN ANTONIO, TX 78201	15603	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
FLOYD JR, MAX J 316 W CRESTVIEW DR MOORESVILLE, IN 46158	4580	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
GLEASON, CHERYL 427 W CHICAGO RD COLDWATER, MI 49036	17281	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			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
GLORIA PEART 64 BELMONT PARK OLD HARBOUR POST OFFICE ST CATHERINE JAMAICA  JAMAICA	21694	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GOODMAN, MICHAEL H 3719 S CHICAGO AVE APT 6  SOUTH MILWAUKEE, WI 53172	2489	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
GRAC, MARIANNE G 1838 WESTFIELD RD  CHARLESTON, SC 29407	14743	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
HARTGERINK, DENISE M 11067 SUNFIELD RD  SUNFIELD, MI 48890	13743	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
HERBERT, LINDA 715 ANDOVER ST SE  GRAND RAPIDS, MI 49548	4631	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".

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
HIAR, ALICE A N5445 N RIVERVIEW RD HESSEL, MI 49745	13059	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
HILL, ELMER H 7038 TOMOTLEY RD MARYVILLE, TN 37801	14279	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
HUDDLESTON, SUSAN R 2616 GRANT ST HOLLYWOOD, FL 33020	22094	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
HYLAND, DOLORES M 7204 E GRAND RIVER AVE LOT 131 C/O VICKI WELLER PORTLAND, MI 48875	4923	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
JAMES GROSS 862 LATHAM ST DAYTON, OH 45408	14305	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
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
JARROD E BAYLESS 757 ERNROE DRIVE DAYTON, OH 45408	17279	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JEANETTE R ROSE 133 BLACKBERRY RD DAYTON, OH 45431	14730	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JEWEL HALL PO BOX 44482 RIO RANCHO, NM 87174	14283	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JOHN J LEWIS 11236 BISHOP LN TOMAHAWK, WI 54487	17718	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JONES, DOROTHY V 29007 FOXBORO ST WILLOWICK, OH 44095	2821	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			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
JONES, RUDOLPH A 5166 POMEGRANATE AVE SACRAMENTO, CA 95823	15233	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
JUDITH A PHILLIPS PO BOX 671 CANFIELD, OH 44406	22080	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KAHLE, SHARON A 130 RAINTRAIL RD SEDONA, AZ 86351	22592	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KEMP, DOUGLAS R 400 CASTLEBERRY RD CLAYTON, NC 27527	19720	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KERRIDGE, DAVID E 23113 BALL TRAIL ATLANTA, MI 49709	4845	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
KITCHEN, WILLARD A 3833 E WINDSONG DR PHOENIX, AZ 85048	13914	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KOHLMEIER, JUDY 7521 FALKENHEIN LN BALDWIN, IL 62217	14599	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KOLAR, DARYL LEE 125 KOLAR LANE RUFFSDALE, PA 15679	13674	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
KONZER, MARIE 2751 SANTIA DR TROY, MI 48085	19127	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
LELTON MARTIN 1878 COUNTY ROAD 284 COURTLAND, AL 35618	331	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".

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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
LEONA G CLARK 7906 BERCHMAN DR HUBER HEIGHTS, OH 45424	14311	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
LETO, FRED 25 RUE NOSTRADAMUS ST REMY DE PROVENCE FRANCE 13210 , FRANCE	14747	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
LEWIS, NATHANIEL J 3455 TAMARACK TRL MOUNT MORRIS, MI 48458	19701	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
LOHRER, GAYLORD E 3477 W JONES LAKE RD GRAYLING, MI 49738	13060	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
LOUIS STANLEY 16175 JAMAICA AVE LAKEVILLE, MN 55044	18203	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
LOVE, EUGENE PO BOX 1185 FLINT, MI 48501	14445	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
MADISON, DOLORES F 1001 ERIE ST PORT HURON, MI 48060	17185	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
MALSON, GENEVIEVE M 30103 IROQUOIS DR WARREN, MI 48088	18921	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
MANSELL, JOSEPH L 2306 RIDGECREST CIR HIAWASSEE, GA 30546	2784	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
MARTEL, FLORENCE ANN 27776 EDGE PARK DR NORTH OLMSTED, OH 44070	22116	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
MARTIN, WANDA C PO BOX 957 DREXEL, NC 28619	2090	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
MEYER, GENE L 145 MAJESTY LN FAYETTEVILLE, GA 30215	19059	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
MODERT, CLYDE D 3000 CLARCONA RD LOT 102 APOPKA, FL 32703	14815	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
NATHANIEL LEWIS 3455 TAMARACK TRL MOUNT MORRIS, MI 48458	19702	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
NUNLEY, ALVIN H 5200 TUCSON DR DAYTON, OH 45418	15800	Moters Liquidation Company		Insufficient Documentation	Pgs. 1-5
			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
PATRICIA ARNOLD 2368 GREENWOOD RD  LAPEER, MI 48446	1908	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PAYNE, THOMAS E 3090 RHODA ST  FLINT, MI 48507	14745	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PEART, GLORIA DOREEN 64 BELMONT PARK OLD HARBOUR POST OFFICE ST CATHERINE JAMAICA  JAMAICA	21695	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PEREZ, EDWARD P 1432 YOUNG LN  LOCKHART, TX 78644	16137	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PICKERING, RONNY C 426 MERRICK ST  ADRIAN, MI 49221	2072	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
PIKE, BLAIR E 23251 SHEPHERD LN MACOMB, MI 48042	21485	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
POWELL, ROBERT L 4614 CLAUDIA DR WATERFORD, MI 48328	2896	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
PRATER, RANDY E 37740 BARTH ST ROMULUS, MI 48174	13040	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROBERT ADAMS 8868 OAK MEADOW DR UNIT 32 SAGINAW, MI 48609	16854	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ROBERT BILLE 436 WHITEHAVEN RD GRAND ISLAND, NY 14072	15982	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
SALLY WATKINS 2410 BAXTER RD APT 4 KOKOMO, IN 46902	4859	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SAMUEL SHIPLEY 6039 WEAVER RD BERLIN CENTER, OH 44401	2047	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SAUTER, DANIEL J 6403 DEERFIELD RD PALMYRA, MI 49268	17598	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SHIPLEY, SAMUEL C 6039 WEAVER RD BERLIN CENTER, OH 44401	2046	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			Unliquidated		
SPRAGUE, DENNIS 1632 TERRY DR SAINT HELEN, MI 48656	2901	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
			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
STANLEY, LOUIS W 16175 JAMAICA AVE LAKEVILLE, MN 55044	18202	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
STOLTMAN, JODY G 2230 S 66TH ST WEST ALLIS, WI 53219	17142	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
STONE-TANNER, OLEMA 4178 OLD TROY PIKE DAYTON, OH 45404	13679	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SULLIVAN, WILLIAM N 1255 CAMINO DEL RANCHO HEMET, CA 92543	4889	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
SYLVESTER MULLINS 11779 TALBOTT ST LOUIS, MO 63138	17595	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
TAVIOLE D BROWN 337 W HUDSON AVE DAYTON, OH 45406	13206	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
TRIETSCH, BOBBIE JEAN 617 GRIBBLE SPRINGS RD SANGER, TX 76266	4985	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
VAN BUREN, LOUVENIA R 18530 GLENWOOD BLVD LATHRUP VILLAGE, MI 48076	4189	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
VIVIAN OWSLEY 8644 S.W. REESE ST. LOT 150 ARCADIA, FL 34269	19731	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
Unliquidated					
WAUGH, MARY L 2114 17TH STREET LN W BRADENTON, FL 34205	13157	Motors Liquidation Company		Insufficient Documentation	Pgs. 1-5
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
WHITE, CYNTHIA S 2301 SANTA ROSA AVE AVON PARK, FL 33825	15638	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WILLIAMS, JUDY A PO BOX 36 ALGER, MI 48610	17574	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WILLIE MCINTYRE 120 NEWBURG PL JACKSON, MS 39206	14281	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
WRIGHT, CHARLES E 2344 LAWNSDALE AVE COLUMBUS, OH 43207	14739	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5
ZAMORA, CORINA 11127 BARCLAY PT SAN ANTONIO, TX 78254	14720	Moters Liquidation Company	Unliquidated	Insufficient Documentation	Pgs. 1-5

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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
<i>CLAIMS TO BE DISALLOWED AND EXPUNGED</i>	100		\$0.00 (S)		
			\$0.00 (A)		
			\$0.00 (P)		
			\$0.00 (U)		
			\$0.00 (T)		

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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' 105<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS**  
**(Claims with Insufficient Documentation)**

Upon the 105th omnibus objection to expunge certain claims, dated September 23, 2010 (the “**105th 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 105th Omnibus Objection to Claims; and due and proper notice of the 105th 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

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the 105th Omnibus Objection to Claims.

105th 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 105th 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 105th 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 105th 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 105th 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 105th 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 105th 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

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United States Bankruptcy Judge