

**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' 109th OMNIBUS OBJECTION TO CLAIMS
(Incorrectly Classified Claims)**

PLEASE TAKE NOTICE that on October 7, 2010, Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (the "**Debtors**"), filed their 109th omnibus objection to reclassify certain claims (the "**109th Omnibus Objection to Claims**"), and that a hearing (the "**Hearing**") to consider the 109th 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 **November 9, 2010 at 9:45**

a.m. (Eastern Time), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE 109th 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 109th 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 **November 2, 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 109th 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 109th 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
October 7, 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
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Attorneys for Debtors and
Debtors in Possession

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

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In re : Chapter 11 Case No.
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MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* :
: :
Debtors. : (Jointly Administered)
: :
-----X

DEBTORS' 109th OMNIBUS OBJECTION TO CLAIMS
(Incorrectly Classified Claims)

**THIS OBJECTION SEEKS TO RECLASSIFY 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 109th omnibus objection to certain claims (the “**109th 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**”), 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 reclassifying the claims listed on **Exhibit “A”** annexed hereto so that they properly conform to the priority and classification schemes set forth in the Bankruptcy Code.¹

2. The Debtors have examined the proofs of claim identified on Exhibit “A” hereto and have determined that the proofs of claim listed under the heading “*Claims to be Reclassified*” (collectively, the “**Incorrectly Classified Claims**”) are claims that are not entitled to secured status because they are not secured by a lien on property in which the estate has an interest or subject to a right of setoff under section 553 of the Bankruptcy Code, nor are they entitled to administrative and/or priority status under any of the subsections of section 503 or section 507(a) of the Bankruptcy Code.

3. Each of the Incorrectly Classified Claims alleges that the Debtors are liable for costs related to environmental contamination; however, the contamination at issue in each of the Incorrectly Classified Claims allegedly occurred before the Debtors commenced voluntary cases under chapter 11 of the Bankruptcy Code. Therefore, the Incorrectly Classified

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.

Claims are solely unsecured claims. The Debtors have filed their chapter 11 plan of liquidation (the “**Plan**”). The Debtors have not yet had an opportunity to review the substantive and complex merits of the subject claims beyond reviewing the priority of the claims if they were to be allowed. It is critical prior to the Plan being confirmed that the Debtors understand the full extent of priority and secured claims so that sufficient cash reserves can be established. Therefore, the Debtors are taking the unusual step of seeking to reclassify the Incorrectly Classified Claims prior to the assessment of the proper amount of any underlying liability. Accordingly, the Debtors reserve all of their rights to object on any other basis to any Incorrectly Classified Claims.

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,

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.

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 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 filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009), *aff’d*, No. 09 Civ. 2229 (DC), 2010 WL 234827 (S.D.N.Y. Jan. 22, 2010); *In re Adelpia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660, at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). 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. Section 506(a) of the Bankruptcy Code defines a “secured claim,” in relevant part, as an “allowed claim of a creditor secured by a lien on property in which the estate has an interest, or that is subject to setoff under section 553 . . . to the extent of the value of such creditor’s interest in the estate’s interest in such property” *Id.* § 506(a).

10. Section 507 of the Bankruptcy Code outlines the specific types of claims that are entitled to priority over other general unsecured claims asserted against a debtor.

11. Section 503 of the Bankruptcy Code establishes an administrative expense priority for certain enumerated categories of estate expenses.

12. The Debtors have reviewed and determined that each Incorrectly Classified Claim improperly asserts that it is a secured, administrative, and/or priority claim. The Incorrectly Classified Claims (i) are not secured by a lien on property in which the estate has an interest or subject to setoff under section 553 of the Bankruptcy Code, (ii) are not entitled to administrative expense status under any of the subsections of section 503 of the Bankruptcy Code, and/or (iii) are not entitled to priority status under any of the subsections of section 507(a) of the Bankruptcy Code. Accordingly, the Debtors request that the Court enter an order reclassifying the secured, administrative, and/or priority portions of each Incorrectly Classified Claim as indicated on Exhibit “A.”

Notice

13. Notice of this 109th 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.

14. 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
October 7, 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
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.
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MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)
f/k/a General Motors Corp., *et al.* : :
: :
Debtors. : (Jointly Administered)
: :
-----X

ORDER GRANTING DEBTORS' 109th OMNIBUS OBJECTION TO CLAIMS
(Incorrectly Classified Claims)

Upon the 109th omnibus objection to reclassify certain claims, dated October 7, 2010 (the “**109th 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 reclassifying the Incorrectly Classified Claims on the grounds that each Incorrectly Classified Claim was incorrectly classified by the claimant, all as more fully described in the 109th Omnibus Objection to Claims; and due and proper notice of the 109th 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 109th Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors,

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the 109th Omnibus Objection to Claims.

and all parties in interest and that the legal and factual bases set forth in the 109th 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 109th Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each “Claim Amount and Priority” listed on **Exhibit “A”** (the “**Order Exhibit**”) annexed hereto is hereby reclassified as indicated on Exhibit “A” under the column “Modified Priority Status/Reduced Amount;” and it is further

ORDERED that, if applicable, the 109th 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 109th 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 109th 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, with respect to this 109th Omnibus Objection to Claims, the Debtors reserve all their rights to object on any other basis to any Incorrectly Classified Claim; 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 109th Omnibus Objection to Claims under the heading "*Claims to be Reclassified*" that is not listed on the Order Exhibit; 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

Exhibit A***CLAIMS TO BE RECLASSIFIED***

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ PO BOX 1980 MORRISTOWN, NJ 07962	69931	Environmental Corporate Remediation Company, Inc.	\$6,099.74	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$6,099.74	(Unsecured Claim)		
			\$6,099.74	(Total Claim)	\$6,099.74	(Total Claim)		

Official Claim Date: 2/1/2010

C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ PO BOX 1980 MORRISTOWN, NJ 07962	69932	Remediation And Liability Management Company, Inc.	\$6,099.74	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$6,099.74	(Unsecured Claim)		
			\$6,099.74	(Total Claim)	\$6,099.74	(Total Claim)		

Official Claim Date: 2/1/2010

(1) 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.

Exhibit A

CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
BASF CORPORATION C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ PO BOX 1980 MORRISTOWN, NJ 07962	69935	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 2/1/2010

BASF CORPORATION C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ PO BOX 1980 MORRISTOWN, NJ 07962	69934	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 2/1/2010

(1) 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.

Exhibit A

CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
BASF CORPORATION ATTN: DAVID P SCHNEIDER ESQ BRESSLER AMERY & ROSS PC PO BOX 1980 MORRISTOWN, NJ 07962	59198	Motors Liquidation Company	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/27/2009								
COLONIAL PIPELINE COMPANY OFFICE OF GENERAL COUNSEL 1185 SANCTUARY PARKWAY ALPHARETTA, GA 30009	69896	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
Official Claim Date: 2/1/2010								
COLONIAL PIPELINE COMPANY OFFICE OF GENERAL COUNSEL 1185 SANCTUARY PARKWAY ALPHARETTA, GA 30004	69929	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
Official Claim Date: 2/1/2010								

(1) 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.

Exhibit A***CLAIMS TO BE RECLASSIFIED***

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
COLONIAL PIPELINE COMPANY	66208	Motors Liquidation Company	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
GENERAL COUNSEL'S OFFICE 1185 SANCTUARY PARKWAY, SUITE 100 ALPHARETTA, GA 30009			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors Liquidation Company	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
Official Claim Date: 11/27/2009			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
EDGEWATER SITE ADMINISTRATIVE GROUP	58620	MLCS Distribution Corporation	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ATTN PAUL G MCCUSKER C/O MCCUSKER ANSELMI ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NY 07932			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 11/27/2009

EDGEWATER SITE ADMINISTRATIVE GROUP	58622	MLCS, LLC	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932 UNITED STATES OF AMERICA			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 11/27/2009

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
EDGEWATER SITE ADMINISTRATIVE GROUP	58623	MLC of Harlem, Inc.	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
PAUL G MCCUSKER ESQ			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
MCCUSKER ANSELM ROSEN & CARVELLI			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932 UNITED STATES OF AMERICA			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		

Official Claim Date: 11/27/2009

EDGEWATER SITE ADMINISTRATIVE GROUP	69943	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
C/O MCCUSKER ANSELM ROSEN & CARVELLI PC			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
ATTN PAUL G MCCUSKER ESQ			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		

Official Claim Date: 2/1/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
EDGEWATER SITE ADMINISTRATIVE GROUP C/O MCCUSKER ANSELM ROSEN & CARVELLI PC ATTN PAUL G MCCUSKER ESQ 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	69944	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
Official Claim Date: 2/1/2010								
EXXON MOBIL CORPORATION ATTN PAUL G MCCUSKER ESQ MCCUSKER ANSELM ROSEN & CARVELLI 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59857	Motors Liquidation Company	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
Official Claim Date: 11/27/2009								

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
EXXON MOBIL CORPORATION ANDREW E ANSELMI ESQ MCCUSKER ANSELMI ROSEN & CARVELLI PC 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59634	MLC of Harlem, Inc.	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						
EXXON MOBIL CORPORATION ANDREW E ANSELMI ESQ MCCUSKER ANSELMI ROSEN & CARVELLI P C 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59635	MLCS Distribution Corporation	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						
EXXON MOBIL CORPORATION ANDREW E ANSELMI ESQ MCCUSKER ANSELMI ROSEN AND CARVELLI PC 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NY 07932	59636	MLCS, LLC	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
EXXON MOBIL CORPORATION C/O PAUL G MCCUSKER ESQ MCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59854	MLC of Harlem, Inc.	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						
EXXON MOBIL CORPORATION C/O PAUL G MCCUSKER ESQ MCCUSKER ANSELM ROSEN & CARVELLI 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59855	MLCS Distribution Corporation	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						
EXXON MOBIL CORPORATION ATTN PAUL G MCCUSKER ESQ MCCUSKER ANSELM ROSEN & CARVELLI 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59856	MLCS, LLC	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
EXXON MOBIL CORPORATION C/O MCCUSKER ANSELMI ROSEN & CARVELLI PC ATTN PAUL G MCCUSKER ESQ 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	69949	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 2/1/2010

EXXON MOBIL CORPORATION C/O MCCUSKER ANSELMI ROSEN & CARVELLI PC ATTN PAUL G MCCUSKER ESQ 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	69950	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 2/1/2010

(1) 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.

Exhibit A***CLAIMS TO BE RECLASSIFIED***

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
EXXON MOBIL CORPORATION ANDREW E ANSELMI ESQ MCCUSKER ANSELMI ROSEN AND CARVELLI PC 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59637	Motors Liquidation Company	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 11/27/2009

GENERAL DYNAMICS LAND SYSTEMS INC MCCARTER & ENGLISH LLP ATTN ROBERT J HOELSCHER PARTNER 1735 MARKET STREET SUITE 700 PHILADELPHIA, PA 19103 UNITED STATES OF AMERICA	44294	Motors Liquidation Company	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 11/24/2009

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
GENERAL DYNAMICS LAND SYSTEMS INC C/O MCCARTER & ENGLISH LLP ATTN ROBERT J HOELSCHER PARTNER 1735 MARKET ST SUITE 700 PHILADELPHIA, PA 19103	69920	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 1/29/2010

GENERAL DYNAMICS LAND SYSTEMS INC C/O MCCARTER & ENGLISH LLP ATTN ROBERT J HOELSCHER PARTNER 1735 MARKET STREET SUITE 700 PHILADELPHIA, PA 19103	69921	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 1/29/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
NORTHROP GRUMMAN CORPORATION C/O BRIAN J HUFNAGEL ESQ, AARON GERSHONOWITZ ESQ FORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, COHN & TERRANA LLP 333 EARLE OVINGTON BLVD, STE 1010 UNIONDALE, NY 11553	65760	MLCS, LLC	\$20,000,000.00 (Secured Claim) \$0.00 (Administrative Expense Claim) \$0.00 (Priority Claim) \$0.00 (Unsecured Claim) \$20,000,000.00 (Total Claim)	\$0.00 (Secured Claim) \$0.00 (Administrative Expense Claim) \$0.00 (Priority Claim) \$20,000,000.00 (Unsecured Claim) \$20,000,000.00 (Total Claim)	Incorrectly Classified Claim	Pgs. 1-5

Official Claim Date: 11/24/2009

NORTHROP GRUMMAN CORPORATION C/O BRIAN J HUFNAGEL ESQ, AARON GERSHONOWITZ ESQ FORCHELLI, CURTO, DEEGAN, SCHWARTZ, MUNCO, COHN & PURANA LLP 333 EARLE OVINGTON BLVD, STE 1010 UNIONDALE, NY 11553	65761	MLCS Distribution Corporation	\$20,000,000.00 (Secured Claim) \$0.00 (Administrative Expense Claim) \$0.00 (Priority Claim) \$0.00 (Unsecured Claim) \$20,000,000.00 (Total Claim)	\$0.00 (Secured Claim) \$0.00 (Administrative Expense Claim) \$0.00 (Priority Claim) \$20,000,000.00 (Unsecured Claim) \$20,000,000.00 (Total Claim)	Incorrectly Classified Claim	Pgs. 1-5
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Official Claim Date: 11/24/2009

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
NORTHROP GRUMMAN CORPORATION	65805	MLC of Harlem, Inc.	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
C/O BRIAN J HUFNAGEL ESQ & AARON GERSCHONOWITZ ESQ			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
FORCHELLI CURTO DEEGAN SCHWARTZ MINEO			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
COHN & TERRANA LLP			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
333 EARLE ORINGTON BLVD SUITE 1010 UMONDALE, NY 11553			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		

Official Claim Date: 11/24/2009

NORTHROP GRUMMAN CORPORATION	69882	Environmental Corporate Remediation Company, Inc.	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
BRIAN J HUFNAGEL ESQ & AARON GERSHONOWITZ ESQ			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
FORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, COHN & TERRANA, LLP			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
333 EARLE OVINGTON BLVD, STE 1010 UNIONDALE, NY 11553			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		

Official Claim Date: 1/28/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
NORTHROP GRUMMAN CORPORATION BRIAN J HUFNAGEL ESQ & AARON GERSHONOWITZ ESQ FORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, COHN & TERRANA, LLP 333 EARLE OVINGTON BLVD, STE 1010 UNIONDALE, NY 11553	69883	Remediation And Liability Management Company, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

NORTHROP GRUMMAN CORPORATION C/O BRIAN J HUFNAGEL ESQ, AARON GERSHONOWITZ ESQ PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, COHN & TERRANA LLP 333 EARLE OVINGTON BLVD SUITE 1010 UNIONDALE, NY 11553	65762	Motors Liquidation Company	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 11/24/2009

(1) 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.

Exhibit A***CLAIMS TO BE RECLASSIFIED***

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
C/O BEVERIDGE & DIAMOND PC ATTN MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022	69940	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 2/1/2010

C/O BEVERIDGE & DIAMOND PC ATTN MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022	69941	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 2/1/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
PETROLEUM TANK CLEANERS, INC	59071	Motors Liquidation Company	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
BEVERIDGE & DIAMOND, PC ATT MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		

Official Claim Date: 11/27/2009

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
PETROLEUM TANK CLEANERS, INC	59072	MLC of Harlem, Inc.	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
BEVERIDGE & DIAMOND, PC ATT MICHAEL MUPHY, ESQ 477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						
PETROLEUM TANK CLEANERS, INC	59073	MLCS, LLC	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
BEVERIDGE & DIAMOND, PC ATT MICHAEL MURPHY, ESQ 477 MADISON AVENUE, 15TH FLOOR NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						
PETROLEUM TANK CLEANERS, INC	59074	MLCS Distribution Corporation	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
C/O BEVERIDGE & DIAMOND PC ATTN MICHAEL MURPHY ESQ 477 MADISON AVE 15TH FLOOR NEW YORK, NY 10022			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		
Official Claim Date: 11/27/2009						

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
QUANTA RESOURCES CORP	67107	Motors Liquidation Company	\$4,800,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$4,800,000.00 (Unsecured Claim)		
			\$4,800,000.00 (Total Claim)	\$4,800,000.00 (Total Claim)		

Official Claim Date: 11/30/2009

(1) 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.

Exhibit A

CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA RESOURCES CORP ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	67104	MLCS, LLC	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
QUANTA RESOURCES CORP ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	67105	MLCS Distribution Corporation	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
QUANTA RESOURCES CORP C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	67106	MLC of Harlem, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

(1) 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.

Exhibit A

CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA RESOURCES CORP	67108	MLC of Harlem, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ARENT FOX LLP			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
QUANTA RESOURCES CORP	67109	MLCS Distribution Corporation	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ARENT FOX LLP			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
QUANTA RESOURCES CORP	67110	MLCS, LLC	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ARENT FOX LLP			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
Official Claim Date: 11/30/2009			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
QUANTA RESOURCES CORP	67111	Motors Liquidation Company	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
ALLEN G REITER, ESQ			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
JAMES M SULLIVAN ESQ			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
ARENT FOX LLP			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
1675 BROADWAY						
NEW YORK, NY 10019			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		

Official Claim Date: 11/30/2009

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA RESOURCES CORPORATION C/O ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	69899	Remediation And Liability Management Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

QUANTA RESOURCES CORPORATION C/O ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	69900	Environmental Corporate Remediation Company, Inc.	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA RESOURCES CORPORATION C/O ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	69901	Environmental Corporate Remediation Company, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

QUANTA RESOURCES CORPORATION ALLEN G REITER, ESQ, AND JAMES SULLIVAN, ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	69902	Remediation And Liability Management Company, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA SITE GROUP	67100	MLCS Distribution Corporation	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ALLEN G REITER, ESQ JAMES M SULLIVAN, ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/30/2009								
QUANTA SITE GROUP	67101	MLC of Harlem, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/30/2009								
QUANTA SITE GROUP	67102	MLCS, LLC	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/30/2009								

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA SITE GROUP C/O ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	69897	Environmental Corporate Remediation Company, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

QUANTA SITE GROUP C/O ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	69898	Remediation And Liability Management Company, Inc.	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		

Official Claim Date: 1/28/2010

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
QUANTA SITE GROUP	67103	Motors Liquidation Company	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/30/2009								
ROCKWELL AUTOMATION INC	59007	Motors Liquidation Company	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ATTN IRVIN M FREILICH ROBERTSON FREILICH BRUNO & COHEN LLC 1 GATEWAY CENTER 17TH FL NEWARK, NJ 07102			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/27/2009								
SC JOHNSON & SON INC ET AL	60563	Motors Liquidation Company	\$147,114.19	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
C/O LINDA E BENFIELD AS HUNT'S SITE TRUSTEE FOLEY & LARDNER LLP 777 E WISCONSIN AVENUE MILWAUKEE, WI 53202			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$147,114.19	(Unsecured Claim)		
			\$147,114.19	(Total Claim)	\$147,114.19	(Total Claim)		
Official Claim Date: 11/27/2009								

(1) 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 RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Modified Priority Status/Reduced Amount		Grounds For Objection	Objection Page Reference
SYRACUSE CHINA COMPANY	59968	Motors Liquidation Company	\$12,498,818.63	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
C/O DUSTIN P ORDWAY ESQ ORDWAY LAW FIRM 300 OTTAWA AVENUE NW SUITE 801 GRAND RAPIDS, MI 49503			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$12,498,818.63	(Unsecured Claim)		
			\$12,498,818.63	(Total Claim)	\$12,498,818.63	(Total Claim)		
Official Claim Date: 11/27/2009								
THE STANLEY WORKS	51141	Motors Liquidation Company	\$4,800,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ATTN IRVIN M FREILICH ROBERTSON FREILICH BRUNO & COHEN LLC 1 GATEWAY CENTER 17TH FL NEWARK, NJ 07102			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$4,800,000.00	(Unsecured Claim)		
			\$4,800,000.00	(Total Claim)	\$4,800,000.00	(Total Claim)		
Official Claim Date: 11/25/2009								
THE STANLEY WORKS	59008	Motors Liquidation Company	\$20,000,000.00	(Secured Claim)	\$0.00	(Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00	(Administrative Expense Claim)	\$0.00	(Administrative Expense Claim)		
ATTN IRVIN M FREILICH ROBERTSON FREILICH BRUNO & COHEN LLC 1 GATEWAY CENTER 17TH FL NEWARK, NJ 07102			\$0.00	(Priority Claim)	\$0.00	(Priority Claim)		
			\$0.00	(Unsecured Claim)	\$20,000,000.00	(Unsecured Claim)		
			\$20,000,000.00	(Total Claim)	\$20,000,000.00	(Total Claim)		
Official Claim Date: 11/27/2009								

(1) 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.

Exhibit A***CLAIMS TO BE RECLASSIFIED***

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
UNITED TECHNOLOGIES CORPORATION	45641	Motors Liquidation Company	\$20,000,000.00 (Secured Claim)	\$0.00 (Secured Claim)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)		
MICHAEL R ENRIGHT ROBINSON & COLE LLP 280 TRUMBULL STREET HARTFORD, CT 06103 UNITED STATES OF AMERICA			\$0.00 (Priority Claim)	\$0.00 (Priority Claim)		
			\$0.00 (Unsecured Claim)	\$20,000,000.00 (Unsecured Claim)		
			\$20,000,000.00 (Total Claim)	\$20,000,000.00 (Total Claim)		

Official Claim Date: 11/25/2009

CLAIMS TO BE RECLASSIFIED**63**

\$691,058,132.30 (Secured Claim)	\$0.00 (Secured Claim)
\$0.00 (Administrative Expense Claim)	\$0.00 (Administrative Expense Claim)
\$0.00 (Priority Claim)	\$0.00 (Priority Claim)
\$0.00 (Unsecured Claim)	\$691,058,132.30 (Unsecured Claim)
\$691,058,132.30 (Total Claim)	\$691,058,132.30 (Total Claim)

(1) 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.