

HEARING DATE AND TIME (NOTE NEW DATE): November 18, 2010 at 9:45 a.m. (Eastern Time)  
OBJECTION DEADLINE (NOTE NEW DATE): November 11, 2010 at 4:00 p.m. (Eastern Time)

Steve Jakubowski  
THE COLEMAN LAW FIRM  
77 West Wacker Dr., Suite 4800  
Chicago, Illinois 60601  
Telephone: (312) 606-8641  
Facsimile: (312) 444-1028  
[sjakubowski@colemanlawfirm.com](mailto:sjakubowski@colemanlawfirm.com)

Attorney for Kevin Junso, Nikki Junso,  
Matt Junso, Cole Junso, and the Estate of  
Tyler Junso

**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

**AMENDED NOTICE OF HEARING ON MOTION OF THE JUNOS TO BE  
DEEMED TO HAVE FILED AN INFORMAL PROOF OF CLAIM  
OR, ALTERNATIVELY, FOR LEAVE TO LATE FILE A PROOF OF CLAIM**

On October 12, 2010, Kevin Junso, Nikki Junso, Matt Junso, Cole Junso, and the estate of Tyler Junso (collectively, the “**Junsos**”), filed a motion (the “**Motion**” at **Dkt. No. 7294**) for an order under Bankruptcy Code sections 105(a) and 501(a), and Bankruptcy Rules 3002 and 9006(b), to be deemed to have filed an informal proof of claim or, alternatively, for leave to late file a proof of claim. A notice of a hearing to 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 18, 2010 at 9:45 a.m.** was served upon you which included a copy of the entire Motion. **THIS NOTICE AMENDS THE NOTICE OF OCTOBER 12, 2010 (the “Original Notice”) AT DOCKET NO. 7295.**

**PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THIS AMENDED NOTICE, THE TIME PERIOD FOR FILING ANY RESPONSES OF OBJECTIONS TO THE MOTION HAS BEEN EXTENDED TO NOVEMBER 11, 2010 AT 4:00 P.M.** (the “**Amended Objection Deadline**”), and any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be (I) (a) filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word

processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and (II) served on the following parties in interest: (1) 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.); (2) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (3) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (4) 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.); (5) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (6) 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.); (7) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (8) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (9) 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.); (10) 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 (11) 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.).

**PLEASE TAKE FURTHER NOTICE** that if no objections are timely filed and served with respect to the Motion, the Junsos may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the **form of the proposed order annexed to the Motion as Exhibit 4**, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: October 13, 2010

KEVIN JUNSO, NIKKI JUNSO, MATT JUNSO, COLE  
JUNSO, AND THE ESTATE OF TYLER JUNSO

By: /s/ Steve Jakubowski  
One of Their Attorneys

Steve Jakubowski (admitted *pro hac vice*)  
THE COLEMAN LAW FIRM  
77 West Wacker Drive, Suite 4800  
Chicago, IL 60601  
Tel: (312) 606-8641  
Fax: (312) 444-1028  
[sjakubowski@colemanlawfirm.com](mailto:sjakubowski@colemanlawfirm.com)