

BEARING DATE AND TIME: March 1, 2011 at 9:45 a.m. (Eastern Time)  
RESPONSE DEADLINE: February 22, 2011 at 4:00 p.m. (Eastern Time)

On the Behalf of Mrs. Doris E. McConnick  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re  
MOTORS LIQUIDATION COMPANY, *et al.*,:  
f!k!a General Motors Corp., *et al*  
Debtors.

Chapter II Case No.  
09-50026 (REG)  
  
(Jointly Administered)

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OBJECTION TO DEBTORS' 187<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS  
(Qualified Defined Benefits Pension Benefits Claims of Former Salaried and Hourly Employees)

THIS OBJECTION SEEKS TO DISALLOW THE DEBTORS' 187<sup>TH</sup> OMNIBUS OBJECTION TO CLAIM 4030.

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Mrs. Doris E. McConnick as claimant, respectfully

represent:

## RELIEF REOUESTED

1. The claimant requests this Court's order denying the Debtors 187th OMNIBUS OBJECTION TO CLAIMS, seeking an order disallowing and expunging certain Qualified Defined Benefits Pension Benefits claims of former salaried employees.

### Back!round

2. The Debtors' first offered and Early Retirement in the 1970's. As an inducement to retire early, the Debtors' offered full pension benefits and full medical coverage for life for those electing early retirement. Mr. Eugene D. McCormick, a salaried employee of the Debtors' accepted that agreement and retired early. The agreement covered his spouse and any dependants. The inducement of the full medical coverage for life has never been offered since then and the Debtors' have tried three times since that that offering to terminate or reduce the full medical coverage agreement. Each time, the Debtors' have lost in court. That medical coverage would include any costs, including any asbestos related medical coverage. As future medical costs are unpredictable, the Debtors' choose to list the costs as unliquidated and/or unidentified with a value of \$0.00. Claimant would argue that the original contractual agreement for future medical coverage is could be determined by actuarial tables such as those provided in the "NOTICE OF HEARINIGS ON MOTION FOR ENTRY OF AN ORDER ESTABLISHINIG CLAIMS RESERVES IN CONNECTION WITH DISTRIBUTIONS TO BE MADE UNDER THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN WITH RESPECT TO , AMOPUNG OTHER THINGS, CERTAIN UNLIQUIDATED CLAIMS", filed by the firm WEIL, GOTSHAL & MANGES, LLP.

### Relief Reauested Should Be Allowed by the Court

3. It is believed that the denial of the Debtors' 187<sup>th</sup> OMNIBUS OBJECTION TO CLAIMS as it regards Mrs. Doris E. McCormick's file #4030 should be denied due to the reliance on the original contract for Early Retirement with the inducement of full medical coverage for life.

### Notice

4. Notice of this Objection has been provided on February 15<sup>th</sup>, 2011 as follows:

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