

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re :  
General Motors Corporation, *et al.*, : Chapter 11  
Debtors. : Case No. 09-50026 (REG)  
: (Joint Administration Pending)  
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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Cleary Gottlieb Steen & Hamilton LLP, on behalf of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, and under *inter alia*, Rules 2002, 7005 and 9007 of the Federal Rules of Bankruptcy Procedures, section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given and served upon:

Cleary Gottlieb Steen & Hamilton LLP  
One Liberty Plaza  
New York, NY 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

Attention: James L. Bromley

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PLEASE TAKE FURTHER NOTICE that under section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal of

informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, e-mail or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed to be a waiver of the above-named party-in-interest's right (1) to have final orders in noncore matters entered only after de novo review by a District Court Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, setoffs, or recoupments to which the above-named party-in-interest is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the above-named party-in-interest expressly reserves.

Dated: June 1, 2009  
New York, New York

Respectfully submitted,

CLEARY GOTTLIEB STEEN & HAMILTON LLP

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