

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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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)  
: :  
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**AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON SEPTEMBER 14, 2009 at 9:00 a.m. AND 10:30 a.m.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling Green, New York, NY 10004-1408

**Matters to be heard at 9:00 a.m.**

**I. CONTESTED MATTERS:**

1. Hearing to Consider Certain Continuing Objections to the Order (i) Authorizing the Sale of Assets Pursuant to the Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser (the "**Purchaser**"); (ii) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (iii) Granting Related Relief [**Docket No. 2968**]

**Response Deadline:** Varies depending on date of receipt of notice of assumption and assignment of executory contract.

**Status:** Debtors will provide a status update to the Court. Limited Contract Objections still outstanding will be adjourned to a hearing in October.

2. Motion of ACE American Insurance Company and Affiliated Companies to Compel Debtors to Assume or Reject Insurance Policies and Related Agreements [**Docket No. 3272**]

**Response Deadline:** July 29, 2009

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s): None to date.

**Status:** Debtors will provide a status update to the Court. This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

3. Debtors' Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim Including Claims Under Section 503(b)(9) of the Bankruptcy Code and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof [**Docket No. 3940**]

Response Deadline: September 9, 2009 at 4:00 p.m.

Responses Filed:

- A. Objection of the Ad Hoc Committee of Asbestos Personal Injury Claimants to Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3), Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof [**Docket No. 3997**]

Replies Filed:

- B. Reply of Debtors to Objection of Ad Hoc Committee of Asbestos Personal Injury Claimants to Motion of Debtors for Order Pursuant to Section 502(B)(9) of the Bankruptcy Code And Bankruptcy Rule 3003(C)(3), Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(B)(9) of the Bankruptcy Code) and Procedures Relating thereto and Approving the Form and Manner of Notice Thereof [**Docket No. 4013**]

Additional Document(s): None to date.

**Status:** This matter is going forward.

## II. UNCONTESTED MATTERS:

4. Motion of Debtors for Entry of Order Pursuant to 11 U.S.C §§ 327 (a) and 330 Authorizing the Debtors to Amend the Terms of Their Engagement with Brownfield Partners, LLC [**Docket No. 3938**]

Response Deadline: September 9, 2009 at 4:00 p.m.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter is going forward on an uncontested basis.

5. Debtors' Sixth Omnibus Motion Pursuant to 11 U.S.C. § 365 to Reject Certain Executory Contracts and Unexpired Leases of Nonresidential Real Property [**Docket No. 3894**]

Response Deadline: September 4, 2009 at 4:00 p.m.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter is going forward on an uncontested basis.

6. Motion of Debtors for Order Pursuant to Section 365(d)(4) of the Bankruptcy Code Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property [**Docket No. 3922**]

Response Deadline: September 8, 2009 at 4:00 p.m.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s): None to date.

**Status:** This matter is going forward on an uncontested basis.

7. Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 1121(d) Extending Exclusive Periods in Which Debtors May File Chapter 11 Plan and Solicit Acceptances Thereof [**Docket No. 3961**]

Response Deadline: September 9, 2009 at 4:00 p.m.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s):

- A. Statement of the Official Committee of Unsecured Creditors in Support of the Debtors' Motion for an Order Pursuant to 11 U.S.C. § 1121(d) Extending Periods in Which Debtors may File Chapter 11 Plan and Solicit Acceptances Thereof [**Docket No. 4007**]

Status: This matter is going forward on an uncontested basis.

**Matters to be heard at 10:30 a.m.**

- 8. Verified Motion of Environmental Testing Corporation (ETC) for Payment of Administrative Expenses [**Docket No. 3140**]

Response Deadline: Not Specified

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s):

- A. Motion to Authorize Payment on Account of Administrative Expense. [**Docket No. 3141**]
- B. Memorandum of Law in Support of Verified Motion for Payment of Administrative Expenses [**Docket No. 3765**] (This Memorandum was withdrawn by counsel for ETC)
- C. Notice of Withdrawal of Memorandum of Law in Support of Verified Motion for Payment of Administrative Expenses [**Docket No. 3777**]

Status: This matter has been resolved by the parties. The Debtors will be presenting a Joint Stipulation to the Court.

**III. ADJOURNED MATTERS:**

- 9. Motion for Relief from Stay by Volba Taxi Inc., Sangria Taxi LLC, Lacoste Taxi Inc., Kroshka Taxi Inc., Two Hump Taxi LLC, Praga Taxi Inc., Black Label Taxi LLC, Torpedo Taxi Inc., Hublot Taxi Inc., Student Taxi Inc., Prada Taxi Inc., Kormilitsa Taxi Inc., Piguet Taxi Inc., Pumo

Taxi Inc., Bratishka Taxi Inc., Persik Taxi Inc., Yagodka Taxi Inc., Malinka Taxi Inc., Murzik Taxi Inc., Jack Daniels Taxi LLC, Tequila Taxi LLC, Calvados Taxi LLC, Cognac Taxi LLC, Grappa Taxi LLC, Patron Taxi LLC, Bazar Taxi Inc., Downtown Taxi Management, LLC, Tunnel Taxi Management, LLC, Victory Taxi Garage Inc., Mamed Dzhaniev, Vladimir Basin, Evgeny A. Friedman (Evgeny Friedman and the plaintiffs in the action entitled, Friedman v. General Motors Corp., 08 Civ.2458 (SAS) [**Docket No. 2759**]

Response Deadline: August 13, 2009 at 4:00 p.m.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s): None to date

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

10. Motion of Sang Chul Lee and Dukson Lee for Order Pursuant to Section 362(d) of the Bankruptcy Code, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 Modifying the Automatic Stay to Allow Continuation of Pre-Petition Litigation [**Docket No. 3023**]

Response Deadline: July 31, 2009 at 4:00 p.m.

Responses Filed:

- A. Debtors' Opposition to the Motion of Sang Chul Lee and Dukson Lee for Order Pursuant to Section 362(d) of the Bankruptcy Code, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 Modifying The Automatic Stay to Allow Continuation of Pre-Petition Litigation [**Docket No. 3485**]

Replies Filed: None to date.

Additional Document(s):

- B. Notice of Appeal filed by Michael S. Kimm on behalf of Dukson Lee, Sang Chul Lee [**Docket No. 3060**]
- C. Notice of Adjournment of Hearing filed by David R. Berz [**Docket No. 4000**]

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

11. Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 3212**]

Response Deadline: Extended to July 30, 2009 at 12:00 noon.

Responses Filed:

- A. Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 3534**]

Replies Filed:

- B. Reply to Objection of Wells Fargo Bank Northwest, N.A., to Motion by Debtors for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 3585**]

Additional Document(s):

- C. Exhibit A (Schedules 1 and 2) re: Declaration of Tyson M. Lomazow in Support of Objection of Wells Fargo Bank Northwest, N.A. [**Docket No. 3538**]
- D. Exhibit A (Schedules 3 and 4) re: Declaration of Tyson M. Lomazow in Support of Objection of Wells Fargo Bank Northwest, N.A. [**Docket No. 3539**]
- E. Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 3619**]
- F. Stipulation to Adjourn Motion for Entry of Order Authorizing Rejection of Certain Personal Property Agreements and/or Abandonment of Collateral to Secured Creditors [**Docket No. 3805**]

Status: This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

12. Application of Federal Republic of Germany for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination

of Individuals Designated by the Debtors and Believed to Have Knowledge of the Relevant Matters [**Docket No. 3520**]

Response Deadline: Not Specified.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s):

- A. Notice of Presentment or Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Compelling the Production of Documents by, and a Deposition of, the Debtors [**Docket No. 3519**]

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

- 13. Application for an Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Authorizing and Directing (A) the Production of Documents and (B) the Oral Examination of Individuals Designated by the Debtors and Believed to have Knowledge of the Relevant Matters filed by Samir Gebrael on behalf of The Brittinghams [**Docket No. 3665**]

Response Deadline: Not Specified.

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s):

- A. Notice of Presentment of Order Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure Compelling the Production of Documents by, and a Deposition of, the Debtors [**Docket No. 3664**]

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

- 14. Motion of the Debtors for Entry of Order Authorizing Rejection of Agreement for Engine Maintenance Services for Gulfstream V Aircraft [**Docket No. 3690**]

Response Deadline: August 13, 2009 at 4:00 p.m.; **Extended to September 21, 2009 at 12:00 p.m.**

Responses Filed: None to date.

Replies Filed: None to date.

Additional Document(s):

- A. Motion for Order Approving Assumption of Agreement for Engine Maintenance Services for Gulfstream 350 Aircraft [Docket No. 3702]

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

15. **Motion for Entry of Order Approving Assumption of Agreement for Engine Maintenance Services for Gulfstream 350 Aircraft [Docket No. 3702]**

**Response Deadline:** August 13, 2009 at 4:00 p.m.; Extended to September 21, 2009 at 12:00 p.m.

**Responses Filed:** None to date.

**Replies Filed:** None to date.

**Additional Document(s):** None to date.

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

16. Motion for Relief from the Automatic Stay, or in the Alternative, for an Order Pursuant to Federal Rules of Bankruptcy Procedure 2004 Compelling an Examination and Production of Documents [Docket No. 3880]

**Response Deadline:** September 9, 2009 at 4:00 p.m.

**Responses Filed:** None to date.

**Replies Filed:** None to date.

**Additional Document(s):** None to date.

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.



17. **Motion of the Bank of New York Mellon Trust Company, N.A., as Resigning Indenture Trustee, for Entry of an Order Appointing manufactures and Traders Company as Successor Indenture Trustee [Docket No. 3759]**

**Response Deadline:** August 21, 2009 at 11:00 a.m.

**Responses Filed:** None to date.

**Replies Filed:** None to date.

**Additional Document(s):** None to date.

**Status:** This matter will be adjourned to the Debtors' next Omnibus Hearing scheduled for October 6, 2009 at 9:45 a.m.

#### **IV. WITHDRAWN MATTERS:**

18. Motion for Relief from Automatic Stay filed by Jacqueline H. Edwards [Docket No. 2946]

**Response Deadline:** None to date.

**Responses Filed:** None to date.

**Replies Filed:** None to date.

**Additional Document(s):**

- A. Motion to Withdraw Motion for Relief from Automatic Stay [Docket No. 3839]

**Status:** This matter has been withdrawn.

19. Motion of ESIS, Inc. to Compel Debtors to Assume or Reject Claims Administration Services Agreements [Docket No. 3273]

**Response Deadline:** July 29, 2009

**Responses Filed:** None to date.

**Replies Filed:** None to date.

**Additional Document(s):**

- A. Notice to Withdrawal of Motion by ESIS, Inc. for an Order Requiring the Debtors to Assume or Reject Claims Administration Services Agreements [**Docket No. 4006**]

**Status:** This matter is has been withdrawn.

- 20. Debtors' Motion to Strike Albert L. Burdick's Designation and Amended Designations of Record and Issues on Appeal [**Docket No. 3919**]

**Response Deadline:** September 9, 2009 at 4:00 p.m.

**Responses Filed:** None to date.

**Replies Filed:** None to date.

**Additional Document(s):**

- A. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick [**Docket No. 3317**]
- B. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick. [**Docket No. 3677**]
- C. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick [**Docket No. 3679**]
- D. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick [**Docket No. 3681**]
- E. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick [**Docket No. 3881**]
- F. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick. [**Docket No. 3882**]
- G. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick. [**Docket No. 3892**]
- H. Designation of Contents (appellant) and Statement of Issues filed by Albert L. Burdick [**Docket No. 3893**]
- I. Statement Withdrawing Appeal filed by Albert L. Burdick [**Docket No. 3985**]
- J. Notice of Withdrawal of Debtors' Motion to Strike Albert L. Burdick's Designation and Amended Designations of the Record and Issues on Appeal [**Docket No. 3992**]

**Status:** This matter has been withdrawn.

Dated: September 11, 2009  
New York, New York

/s/ Joseph H. Smolinsky

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