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Counsel for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
	: :
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	: :
	: (Jointly Administered)
Debtors.	: :
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NOTICE OF (A) FILING OF (I) MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE COURT’S JULY 5, 2009 SALE ORDER AND INJUNCTION (MONETARY RELIEF ACTIONS, OTHER THAN IGNITION SWITCH ACTIONS), AND (II) MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THIS COURT’S JULY 5, 2009 SALE ORDER AND INJUNCTION AGAINST PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUIT, AND (B) CONFERENCE TO BE HELD IN CONNECTION WITH SUCH MOTIONS

PLEASE TAKE NOTICE that on August 1, 2014, General Motors LLC (“**New GM**”) filed with the United States Bankruptcy Court for the Southern District of New York the following motions: (i) the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions,*

Other Than Ignition Switch Actions) (“**Monetary Relief Motion to Enforce**”), and (2) *Motion Of General Motors LLC Pursuant To 11 U.S.C. §§ 105 And 363 To Enforce This Court’s July 5, 2009 Sale Order And Injunction Against Plaintiffs In Pre-Closing Accident Lawsuits* (“**Pre-Closing Accidents Motion to Enforce**,” and with the Monetary Relief Motion to Enforce, the “**Motions**”).

PLEASE TAKE FURTHER NOTICE that briefing schedules and hearing dates have not yet been established for the Motions. Instead, the Bankruptcy Court has scheduled a conference to discuss the logistics surrounding the Motions, including whether proceedings regarding same should be coordinated with the proceedings governing New GM’s previously filed Ignition Switch Motion to Enforce. The conference will take place before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **August 18, 2014 at 9:45 a.m.**

Dated: New York, New York
August 4, 2014

/s/ Arthur Steinberg
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