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Attorneys for the Motors Liquidation Company GUC Trust Administrator

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al.,

09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors.

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AMENDED NOTICE OF AGENDA OF CERTAIN MATTERS SCHEDULED FOR HEARING ON JULY 1, 2015 AT 9:45 A.M.

(Jointly Administered)

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 523, One Bowling

Green, New York, NY 10004-1408

## I. <u>CONTESTED MATTERS:</u>

1. Motion of Wilmington Trust Company, as GUC Trust Administrator and Trustee, for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock and (B) to Make Corresponding Amendments to The GUC Trust Agreement [Docket No. 13186]

Response Deadline: June 24, 2015

Objections/responses Filed:

A. Response with Objection by Atul C. Shah to the Notice of Motion of Wilmington Trust Company, as GUC Trust Administrator and Trustee, for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate

- New GM Common Stock, and (B) to Make Corresponding Amendments to the GUC Trust Agreement (C) Sharing of the Monetary Wealth with Creditor Atul C. Shah (D) Sharing of the Knowledge by Atul C. Shah, MD with the Distinguished Entities [Docket Entry No. 13244]
- B. The Ignition Switch Plaintiffs' and Certain Non-Ignition Switch Plaintiffs' Request for a Stay of Distributions of GUC Trust Assets and Response to Motion of Wilmington Trust Company, as GUC Trust Administrator and Trustee, for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock and (B) to Make Corresponding Amendments to The GUC Trust Agreement [Docket Entry No. 13246]
- C. Joinder of Ignition Switch Pre-Closing Accident Plaintiffs to the Ignition Switch Plaintiffs' and Certain Non-Ignition Switch Plaintiffs' Request for a Stay of Distributions of GUC Trust Assets and Response to Motion of Wilmington Trust Company, as GUC Trust Administrator and Trustee, for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock and (B) to Make Corresponding Amendments to the GUC Trust Agreement and Request for Stay of Distributions of GUC Trust Assets [Docket Entry No. 13248]
- D. Omnibus Reply of Wilmington Trust Company, As GUC Trust Administrator and Trustee, to Responses Received in Respect of the GUC Trust Administrators Motion for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock and (B) to Make Corresponding Amendments to the GUC Trust Agreement [Docket Entry No. 13256]
- E. The Participating Unitholders' Joinder to the Omnibus Reply of Wilmington Trust Company, as GUC Trust Administrator and Trustee, to Responses Received in Respect of the GUC Trust Administrator's Motion for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock and (B) to Make Corresponding Amendments to the GUC Trust Agreement [Docket Entry No. 13258]
- F. Response to the Omnibus Reply of Wilmington Trust Company, As GUC Trust Administrator and Trustee, to Responses Received in Respect of the GUC Trust Administrator's Motion for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock and (B) to Make Corresponding Amendments to the GUC Trust Agreement (C) Requesting Relief Sought for Creditor Atul C. Shah (D) Requesting that this Historic Civil Case By Atul C. Shah has Excellent Merits [Docket Entry No. 13265]

## Related Documents:

A. Notice of Filing of Revised Proposed Order in Respect of Motion of Wilmington Trust Company, as GUC Trust Administrator and Trustee, for an Order Granting Authority (A) to Exercise New GM Warrants and Liquidate New GM Common Stock, and (B) to Make Corresponding Amendments to the GUC Trust Agreement [Docket Entry No. 13266]

<u>Status:</u> This matter has been resolved with respect to the objections/responses identified as items B and C above. The Objectors have agreed to withdraw their objection to the GUC Trust's Motion, and their requests for affirmative relief shall be adjourned to July 30, 2015 at 9:45 a.m. This matter is going forward with respect to the objection/response identified as item A above.

Dated: New York, New York

June 30, 2015

Respectfully submitted,

/s/ Matthew J. Williams

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