

Hearing Date: June 25, 2009 9:45 a.m.  
Objection Deadline: June 19, 2009 4:00 p.m.

Sander L. Esserman (Admitted *Pro Hac Vice*)  
Robert T. Brousseau (Admission *Pro Hac Vice* pending)  
Peter D'Apice  
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COUNSEL FOR AD HOC COMMITTEE OF  
ASBESTOS PERSONAL INJURY CLAIMANTS

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
)  
In re ) Chapter 11  
)  
GENERAL MOTORS CORP., *et al.*, )  
) Case No. 09-50026 (REG)  
)  
Debtors. ) Jointly Administered  
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**NOTICE OF HEARING ON MOTION OF THE AD HOC COMMITTEE OF  
ASBESTOS PERSONAL INJURY CLAIMANTS FOR AN ORDER  
(I) APPOINTING A LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS  
PERSONAL INJURY CLAIMANTS AND  
(II) DIRECTING THE UNITED STATES TRUSTEE TO APPOINT AN  
OFFICIAL COMMITTEE ASBESTOS PERSONAL INJURY CLAIMANTS**

On June 7, 2009, the Ad Hoc Committee of Asbestos Personal Injury  
Claimants<sup>1</sup> filed its Motion for an Order (I) Appointing a Legal  
Representative for Future Asbestos Personal Injury Claimants and (II)

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<sup>1</sup> The Ad Hoc Committee of Asbestos Personal Injury Claimants is comprised of William J. Lewis a mesothelioma claimant with a settled but unpaid claim, represented by SimmonsCooper LLC; Maureen Tavaglione, Personal Representative of the Estate of Robert J. Tavaglione, represented by Waters & Kraus; Terry Roth, a lung cancer claimant, represented by Brayton Purcell LLP; Jene Moore, Sr., a mesothelioma claimant represented by Early Ludwick & Sweeney L.L.C.; Edward Levitch, represented by Paul & Hanley LLP; and asbestos personal injury claimants represented by Cooney and Conway; The Lanier Law Firm PLLC and Weitz & Luxemberg, P.C. Steven Kazan, Kazan, McClain, Lyons, Greenwood & Harley, PLC, serves as an *ex officio member*.

Directing the United States Trustee to Appoint an Official Committee of Asbestos Personal Injury Claimants (the “Motion”).

The Motion seeks entry of an order appointing a legal representative for the purpose of protecting the rights of persons who may assert demands against General Motors for asbestos-related personal injury claims and directing the United States Trustee to appoint an Official Committee of Asbestos Personal Injury Claimants in these jointly administered cases.

A hearing on the Motion will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Room 628 of the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 1004, on **June 25, 2009 at 9:45 a.m. (Eastern Time)** or as soon thereafter as counsel may be heard.

Objections to the Motion must be made in writing, filed with the Court, and served upon the following so as to be actually received not later than **4:00 p.m. Eastern Time on Friday, June 19, 2009** ( the “**Objection Deadline**”): (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); Honigman Miller Schwartz and Cohn LLP, , attorneys for the Debtors, 660 Woodward Avenue, 2290 First National Building, Detroit, Michigan 48226 (Attn: Robert B. Weiss, Esq., Donald F. Baty, Jr., Esq, and Tricia A. Sherick, Esq.); (ii) the Debtors, c/o General

Motors Corporation, 300 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iii) Cadwalader, Wickersham & Taft LLP, attorneys for the Purchaser, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (iv) the U.S. Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Matthew Feldman, Esq.); (v) Vedder Price, PC, attorneys for EDC, 1633 Broadway, 47<sup>th</sup> Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vi) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Kenneth H. Eckstein, Esq. and Thomas Moers Mayer, Esq.); (vii) the UAW, 8000 East Jefferson Avenue, Detroit, Michigan 48214 (Attn: Daniel W. Sherrick, Esq.); (viii) Cleary Gottlieb Steen & Hamilton LLP, attorneys for the UAW, One Liberty Plaza, New York, New York 10006 (Attn: James L. Bromley, Esq.); (ix) Cohen, Weiss and Simon LLP, attorneys for the UAW, 330 W. 42<sup>nd</sup> Street, New York, New York 10036 (Attn: Babette Ceccotti, Esq.); (x) the Office of the United States Trustee for the Southern District of New York (Attn: Diana G. Adams, Esq.), 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004; (xi) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Matthew L. Schwartz, Esq.); and (xii) counsel for the movant, Stutzman Bromberg

Esserman and Plifka, A Professional Corporation, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq.).

Registered users of the Bankruptcy Court's case filing system must electronically file their objections and responses. All other parties in interest must file their objections and responses on a floppy disk or flash drive, preferably in Portable Document Format ("PDF"), Microsoft Word or any other Windows-based word processing format with a hard copy delivered directly to the chamber of the Hon. Robert E. Gerber, in accordance with General Order M-182 – Electronic Means for Filing, Signing, and Verification of Documents, dated June 26, 1997.

Dated: June 10, 2009

Respectfully submitted,

*/s/ Peter C. D'Apice*

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