

HEARING DATE AND TIME: January 17, 2013 at 9:45 a.m. (Eastern Time)
OBJECTION DEADLINE: January 10, 2013 at 4:00 p.m. (Eastern Time)
REPLY DEADLINE: January 14, 2013 at 12:00 noon (Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	: :
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.	: :
	: :
Debtors.	: (Jointly Administered)
	: :
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**NOTICE OF HEARING ON MOTION OF
GENERAL MOTORS LLC PURSUANT TO
11 U.S.C. §§ 105 AND 363 TO ENFORCE THE SALE ORDER**

PLEASE TAKE NOTICE that upon the annexed Motion, dated December 3, 2012 (the “**Motion**”), of General Motors LLC (f/k/a General Motors Company) (“**New GM**”), for an order to enforce the *Order (i) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (ii) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (iii) Granting Related Relief*, entered by the Court on July 5, 2009 by (a) directing Ashraf Elgohary (“**Elgohary**”) to cease and desist from further prosecuting, or otherwise pursuing the claims asserted by him in an action (“**State Court Action**”) commenced in the Superior Court of New Jersey, Camden County, Case No. L 975-12, against New GM, and (b)

directing Elgohary to dismiss the State Court Action with prejudice forthwith, all as more fully set forth in the Motion, a hearing will be held 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 **January 17, 2013 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq. and Scott Davidson, Esq.), so as to be received no later than **January 10, 2013, at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that any reply shall be filed and served by **January 14, 2013 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, New GM may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
December 3, 2012

Respectfully submitted,

/s/ Scott Davidson
Arthur Steinberg
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