

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222
Arthur Steinberg
Scott Davidson

Attorneys for General Motors LLC

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

-----X	
In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**GENERAL MOTORS LLC’S COUNTER-DESIGNATION
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD
ON APPEAL REGARDING THE APPEAL OF THE
BANKRUPTCY COURT’S APRIL 13, 2018 OPINION [ECF NO. 14271]**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), General Motors LLC (“**New GM**”) submits this counter-designation of additional items to be included in the record on appeal in connection with the appeal of the *Memorandum Opinion and Order Granting General Motors LLC’s Motion to Enforce the Sale Order with Respect to Pat Bombard*, dated April 13, 2018 [ECF No. 14271] (the “**April 2018 Opinion**”).

COUNTER-DESIGNATION OF RECORD

In addition to the items designated by Appellant in his statement, entered on May 7, 2018 [ECF No. 14297], New GM submits the following designation of additional items to be included in the record on appeal of the April 2018 Opinion (including any exhibit, annex, appendix or addendum thereto):

<u>Item No.</u>	<u>Date Filed</u>	<u>Description</u>	<u>Docket No.</u>
1.	2/27/2018	Motion by General Motors LLC to Enforce the Bankruptcy Court's Sale Order and Court-Approved Deferred Termination (Wind-Down) Agreement with Respect to Pat Bombard	14243
2.	3/16/2018	Motion to Dismiss filed by Pat J. Bombard	14255
3.	3/26/2018	Reply by General Motors LLC to Objection by Pat Bombard to Motion by General Motors LLC to Enforce the Bankruptcy Court's Sale Order and Court-Approved Deferred Termination (Wind-Down) Agreement with Respect to Pat Bombard	14253
4.	3/29/2018	Letter to Judge Glenn filed by Pat J. Bombard	14266
5.	3/30/2018	Transcript of hearing held on March 29, 2018	14274
6.	4/5/2018	Supplemental Memorandum in Further Support of Motion by General Motors LLC to Enforce the Bankruptcy Court's Sale Order and Court-Approved Deferred Termination (Wind-Down) Agreement with Respect to Pat Bombard	14268
7.	4/5/2018	Statement/Purpose: To presents facts, exhibits, and proof outlining Chevrolet franchise owner by Pat J. Bombard per the March 29, 2018 request of the court	14269
8.	4/13/2018	Memorandum Opinion and Order Granting General Motors LLC's Motion to Enforce Sale Order with Respect to Pat Bombard	14271
9.	5/16/2018	Transcript of hearing held on April 12, 2018	14305

Dated: New York, New York
May 18, 2018

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg
Scott Davidson
KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Attorneys for General Motors LLC