

ROBINSON BROG LEINWAND  
GREENE, GENOVESE & GLUCK, P.C.  
1345 Avenue of the Americas  
New York, New York 10105  
(212) 603-6300  
Russell P. McRory  
Fred B. Ringel  
A. Mitchell Greene  
Robert R. Leinwand

**Sale Approval Hearing Date: June 30, 2009 at 9:45 a.m**  
**Sale Motion Objection Deadline: June 19, 2009 5:00 p.m.**

MYERS & FULLER P.A.  
2822 Remington Green Circle  
Tallahassee, Florida 32308  
(850) 878-6404  
Richard Sox (admission pro hac vice pending)  
Shawn Mercer (admission pro hac vice pending)  
Robert Byerts (admission pro hac vice pending)

Attorneys for Greater New York Automobile Dealers

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

-----X  
**In re:** : **CHAPTER 11**  
:   
**GENERAL MOTORS CORP., et al.,** : **Case No. 09-50026 (REG)**  
:   
: **(Jointly Administered)**  
**Debtors.** :   
-----X

**MOTION FOR ADMISSION OF  
SHAWN D. MERCER TO PRACTICE, *PRO HAC VICE***

I, Russell P. McRory, a member in good standing of the bar of the State of New York and admitted to practice in the United States District Court for the Southern District of New York, hereby moves for the admission, *pro hac vice*, of **SHAWN D. MERCER**, a member in good standing of the bar of the State of North Carolina and admitted to practice in the United States District Courts for the United States Supreme Court, Fourth Circuit Court of Appeals for the United States District Court, Eastern, Middle and Western Districts of North Carolina and the Eastern District of Michigan, among others,

*pro hac vice*, to represent the Greater New York Automobile Dealers Association in the above-captioned chapter 11 case.

Mailing Address: Shawn D. Mercer  
Myers & Fuller P.A.  
9104 Falls of Neuse Road, Ste 200  
Raleigh NC 27615

Street Address: Myers & Fuller P.A.  
9104 Falls of Neuse Road, Ste 200  
Raleigh NC 27615

Telephone: (919) 847.8632

E-mail: smercer@dealerlawyers.com

The fee of \$25 has been paid with the filing of this motion.

Dated: June, 19, 2009  
New York, New York

ROBINSON BROG LEINWAND  
GREENE  
GENOVESE & GLUCK P.C.  
By: /s/ Russell P. McRory  
Russell P. McRory, Esq.  
Fred B. Ringel, Esq.  
A. Mitchell Greene, Esq.  
Robert R. Leinwand, Esq.  
1345 Avenue of the Americas  
New York, New York 10105  
Telephone: (212) 603-6300  
Facsimile: (212) 956-2164

and  
MYERS & FULLER P.A.  
Richard Sox, Esq.  
Shawn Mercer, Esq.  
Robert Byerts, Esq.  
2822 Remington Green Circle  
Tallahassee, Florida 32308

*Attorneys for Greater New York  
Automobile Dealers Association*

# **EXHIBIT A**

ROBINSON BROG LEINWAND  
GREENE, GENOVESE & GLUCK, P.C.  
1345 Avenue of the Americas  
New York, New York 10105  
(212) 603-6300  
Russell P. McRory  
Fred B. Ringel  
A. Mitchell Greene  
Robert R. Leinwand

**Sale Approval Hearing Date: June 30, 2009 at 9:45 a.m**  
**Sale Motion Objection Deadline: June 19, 2009 5:00 p.m.**

MYERS & FULLER P.A.  
2822 Remington Green Circle  
Tallahassee, Florida 32308  
(850) 878-6404  
Richard Sox (admission pro hac vice pending)  
Shawn Mercer (admission pro hac vice pending)  
Robert Byerts (admission pro hac vice pending)

Attorneys for Greater New York Automobile Dealers

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

-----X  
**In re:** : **CHAPTER 11**  
:   
**GENERAL MOTORS CORP., et al.,** : **Case No. 09-50026 (REG)**  
:   
: **(Jointly Administered)**  
**Debtors.** :   
-----X

**ORDER ADMITTING SHAWN D. MERCER  
FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

On motion of Russell P. McRory to admit **SHAWN D. MERCER**, a member in good standing of the bar of the State of North Carolina, *pro hac vice*, to represent the Greater New York Automobile Dealers Association in the above-captioned chapter 11 case, and the filing fee having been paid,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

2. **SHAWN D. MERCER** is admitted to practice, *pro hac vice*, in the above-captioned chapter 11 case, in the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York  
June \_\_\_\_, 2009

---

UNITED STATES BANKRUPTCY JUDGE