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COUNSEL FOR BELO CORP.

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

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**In re**

**GENERAL MOTORS CORP., et al.,**

**Debtors**

**Chapter 11 Case No.**

**09-50026 (REG)**

**(Jointly Administered)**

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**BELO CORP.’S LIMITED OBJECTION TO NOTICE OF (I) DEBTORS’ INTENT TO  
ASSUME AND ASSIGN CERTAIN EXECUTORY CONTRACTS, UNEXPIRED  
LEASES OF PERSONAL PROPERTY, AND UNEXPIRED LEASES OF  
NONRESIDENTIAL REAL PROPERTY AND (II) CURE AMOUNTS RELATED  
THERE TO**

Belo Corp. (“Belo”), by and through its undersigned counsel, as and for its limited objection to the Notice of (i) Debtors’ Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (ii) Cure Amounts Related Thereto (the “Notice”), respectfully states as follows:

1. On or about June 10, 2009, Belo received the Notice along with instructions for logging into the Debtors’ website purportedly containing information regarding what the Debtors believe are the appropriate cure amounts for assumable executory contracts to which Belo is a

party (the "Belo Contracts"). Upon logging into the website, Belo discovered that the Debtors listed no information regarding the Belo contracts which they contend may be assumed as executory contracts, no indication as to whether the Belo Contracts will or will not be assumed, and no dollar figure as to the proposed cure amounts.

2. Prior to June 1, 2009 (the "Petition Date"), Belo and its affiliate entities provided advertising services to the Debtors and/or various of its debtor affiliates through third party vendors. A substantial number of ad buys had been placed as of the Petition Date and for which Belo did not receive payment. According to Belo's records, the Debtors owe Belo up to \$2,497,931.00 in unpaid advertising expenses.

3. Belo submits this limited objection to the Notice to preserve its rights and because there has been no information provided to Belo to determine what amounts the Debtors assert are proper cure amounts. Moreover, there is no information available on the website to identify which contracts the Debtors believe may be assumed pursuant to the Notice and in accordance with the Bankruptcy Code.

WHEREFORE, Belo requests that this Court sustain this limited objection to the Notice so that Belo's rights in connection with any purported assumption of the Belo Contracts are preserved and for such further relief to which it may show itself justly entitled.

Dated: July 7, 2009

Respectfully submitted,

**LOWENSTEIN SANDLER, PC**

By: /s/ Michael S. Etkin  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**CERTIFICATION OF SERVICE**

JANE M. WOJSLAWOWICZ, of full age, being duly sworn on her oath according to law, deposes and says:

1. I am a legal secretary employed by the law firm of Lowenstein Sandler PC, counsel to Belo Corp. in the above captioned matter.

2. On Tuesday, July 7, 2009, this firm caused a true and correct copy of the following documents to be electronically filed with the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York:

a. Belo Corp.'s Limited Objection to Notice of (i) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (ii) cure Amounts Related Thereto.

3. On July 7, 2009, I caused a true and correct copy of the aforementioned document to be served upon the attached service list annexed hereto via e-mail and United States Postal Service, postage prepaid.

4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 7, 2009

/s/ Jane M. Wojslawowicz  
Jane M. Wojslawowicz

In re General Motors Corp., et al.  
Case No. 09-50026 (REG)

**SERVICE LIST**

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