

**Objection Deadline: August 13, 2009 at 4:00 p.m.**  
**Hearing Date: August 18, 2009 at 9:45 a.m.**

KILPATRICK & ASSOCIATES, P.C.  
903 N. Opdyke Road, Suite C  
Auburn Hills, MI 48326  
RICHARDO I. KILPATRICK, ESQ.  
LEONORA K. BAUGHMAN, ESQ.  
(248) 377-0700

ATTORNEYS FOR WAYNE COUNTY TREASURER  
OAKLAND COUNTY TREASURER AND CITY OF DETROIT

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

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF OBJECTION OF THE WAYNE COUNTY  
TREASURER, THE OAKLAND COUNTY TREASURER AND THE CITY OF  
DETROIT TO THE MOTION OF DEBTORS FOR ENTRY OF AN ORDER  
PURSUANT TO 11 U.S.C. §§ 105 AND 363 (A) ESTABLISHING PROCEDURES FOR  
THE DISPOSITION OF *DE MINIMIS* ASSETS, AND (B) AUTHORIZING THE  
DEBTORS TO (i) PAY RELATED FEES, AND (ii) ASSUME, ASSUME AND  
ASSIGN, OR REJECT RELATED EXECUTORY CONTRACTS OR UNEXPIRED  
LEASES**

NOW COMES Creditors, the Wayne County Treasurer, the Oakland County  
Treasurer and the City of Detroit, by and through counsel, Kilpatrick & Associates, P.C.,  
and for their Withdrawal of the Objection to Motion of Debtors for Entry of an Order  
Pursuant to 11 U.S.C. §§ 105 and 363 (A) Establishing Procedures for the Disposition of *De  
Minimis* Assets, and (B) Authorizing the Debtors to (i) Pay Related Fees, and (ii) Assume,  
Assume and Assign, or Reject Related Executory Contracts or Unexpired Leases states as  
follows:

1. On August 10, 2009, the Wayne County Treasurer, the Oakland County Treasurer and the City of Detroit, filed an Objection to Motion of Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105 and 363 (A) Establishing Procedures for the Disposition of *De Minimis* Assets, and (B) Authorizing the Debtors to (i) Pay Related Fees, and (ii) Assume, Assume and Assign, or Reject Related Executory Contracts or Unexpired Leases [Docket No. 3733] (“Objection”).

2. The Debtors and the Wayne County Treasurer, the Oakland County Treasurer and the City of Detroit have resolved the Objection by agreement for the addition of language to be inserted into the proposed Order.

**CONCLUSION**

3. For the foregoing reasons, the Wayne County Treasurer, the Oakland County Treasurer and the City of Detroit withdraw their Objections.

Respectfully submitted,

KILPATRICK & ASSOCIATES, P.C.  
Attorneys for the Wayne County Treasurer,  
the Oakland County Treasurer and the City  
of Detroit

/s/ Richardo I. Kilpatrick  
RICHARDO I. KILPATRICK (P35275)  
LEONORA K. BAUGHMAN (P33534)  
903 N. Opdyke Road, Suite C  
Auburn Hills, MI 48326  
(248) 377-0700  
[ecf@kaalaw.com](mailto:ecf@kaalaw.com)

Dated: August 14, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice of Withdrawal of Objection of the Wayne County Treasurer, the Oakland County Treasurer and the City of Detroit to the Motion of Debtors' for Entry of an Order Pursuant to U.S.C. §§ 105, 363 (A) Establishing Procedures for the Disposition of *De Minimis* Assets, And (B) Authorizing the Debtors to (i) Pay Related Fees, and (ii) Assume, Assume and Assign, or Reject Related Executory Contracts of Unexpired Leases was duly served to all registered parties through the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York and to the following via e-mail (where applicable), and by first-class mail postage prepaid to:

Office of the United State Trustee  
Southern District of New York  
33 Whitehall Street  
New York, NY 10004

Mr. Harvey R. Miller  
Weil, Gotshal & Manges LLP,  
767 Fifth Ave  
New York, NY 10153

General Motors Corp  
300 Renaissance Center  
Detroit, MI 48265  
Attn: L. Buonomo

Cadwalader, Wickersham & Taft,  
LLP  
Presidential Task Force  
One World Financial Center  
New York, NY 10281  
Attn: J. Rapisardi

Vedder Price P.C.  
Counsel – Export Development Canada  
1633 Broadway, 47<sup>th</sup> floor  
New York, NY 10019  
Attn: M. Edelman

McMillan LLP  
Attn: Peter Willis  
Brookfield Place, Suite 4400  
181 Bay St  
Toronto Ontario Canada M5J  
2T3

Simpson Thacher & Bartlett LLP  
425 Lexington Ave  
New York, NY 10017  
Attn: Peter Pantaleo and David Mack

Morgan, Lewis & Bockius, LLP  
101 Park Ave.  
New York, NY 10178  
Attn: Richard Toder

International Union of Operating  
Engineers  
c/o Barbara S. Mehlsack, Esq.  
Gorlick, Kravitz & Listhaus, P.C.  
17 State Street, 4th Floor  
New York, NY 10004-1519

International Union,  
United Automobile, Aero  
8000 E. Jefferson Avenue  
Detroit, MI 48214-3963

Class Representatives of (1) Intl Union,  
UAW  
MEYER SUOZZI ENGLISH & KLEIN,  
P.C.  
1350 Broadway, Suite 501  
P.O. Box 822  
New York, NY 10018-0026

/s/ Larissa Robertson  
Larissa Robertson  
An Employee of Kilpatrick & Associates

August 14, 2009