



**2010 at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE THIRTY-FIRST OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT “A” ANNEXED THERETO.**

**PLEASE TAKE FURTHER NOTICE** that any responses to the Thirty-First Omnibus Objection to Claims 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](http://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](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP,

attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Amy Caton, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **July 30, 2010 at 4:00 p.m. (Eastern Time)** (the "**Response Deadline**").

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Thirty-First Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Thirty-First Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
July 2, 2010

/s/ Joseph H. Smolinsky \_\_\_\_\_  
Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

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Attorneys for Debtors and  
Debtors in Possession

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

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

**DEBTORS' THIRTY-FIRST OMNIBUS OBJECTION TO CLAIMS**  
**(Incorrectly Classified Claims)**

**THIS OBJECTION SEEKS TO RECLASSIFY CERTAIN FILED PROOFS OF CLAIM.  
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE  
EXHIBIT ANNEXED TO THIS OBJECTION.**

TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) (“MLC”) and  
its affiliated debtors, as debtors in possession (collectively, the “Debtors”), respectfully  
represent:

## Relief Requested

1. The Debtors file this thirty-first omnibus objection to certain claims (the “**Thirty-First Omnibus Objection to Claims**”) pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order reclassifying the claims listed on **Exhibit “A”** annexed hereto so that they are in accordance with the Bankruptcy Code.<sup>1</sup>

2. The Debtors have examined the proofs of claim identified on Exhibit “A” hereto and have determined that the proofs of claim listed under the heading “*Claims to be Reclassified*” (collectively, the “**Incorrectly Classified Claims**”) are claims that are not entitled to secured status because they are not secured by a lien on property in which the estate has an interest or subject to setoff under section 553 of the Bankruptcy Code, nor are they entitled to administrative and/or priority status under any of the subsections of section 507(a) of the Bankruptcy Code.

## Jurisdiction

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

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<sup>1</sup> Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, [www.motorsliquidation.com](http://www.motorsliquidation.com). A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

## Background

4. On June 1, 2009, four of the Debtors (the “**Initial Debtors**”)<sup>2</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the “**Realm/Encore Debtors**”)<sup>3</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the Realm/Encore Debtors filed their schedules of assets and liabilities and statements of financial affairs.

5. On September 16, 2009, this Court entered an order [Docket No. 4079] establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors’ cases, including governmental units. On December 2, 2009, this Court entered an order [Docket No. 4586] establishing February 1, 2010 as the deadline for each person or entity to file a proof of claim in the Realm/Encore Debtors’ cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim).

6. Furthermore, on October 6, 2009, this Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

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<sup>2</sup> The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

<sup>3</sup> The Realm/Encore Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

### **The Relief Requested Should Be Approved by the Court**

7. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009), *aff’d*, No. 09 Civ. 2229 (DC), 2010 WL 234827 (S.D.N.Y. Jan. 22, 2010); *In re Adelpia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660, at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

8. Section 506(a) of the Bankruptcy Code defines a “secured claim,” in relevant part, as an “allowed claim of a creditor secured by a lien on property in which the estate has an interest, or that is subject to setoff under section 553 . . . to the extent of the value of such creditor’s interest in the estate’s interest in such property . . . .” *Id.* § 506(a).

9. The Debtors have reviewed and determined that each Incorrectly Classified Claim improperly asserts that it is a secured, administrative, and/or priority claim as indicated in the “*Note*” below each Incorrectly Classified Claim listed on Exhibit “A.” The Incorrectly Classified Claims (i) are not secured by a lien on property in which the estate has an interest or subject to setoff under section 553 of the Bankruptcy Code, (ii) are not on account of obligations owed on goods received by a Debtor within 20 days before such Debtor commenced its chapter 11 case, and/or (iii) are not entitled to priority status under any of the subsections of section 507(a) of the Bankruptcy Code. Accordingly, the Debtors request that the Court enter an

order reclassifying the secured, administrative, and/or priority portions of each Incorrectly Classified Claim as indicated on Exhibit "A."

**Notice**

10. Notice of this Thirty-First Omnibus Objection to Claims has been provided to each claimant listed on Exhibit "A" and parties in interest in accordance with the Third Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated April 29, 2010 [Docket No. 5670].

11. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York  
July 2, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP  
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Attorneys for Debtors  
and Debtors in Possession

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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

**ORDER GRANTING DEBTORS' THIRTY-FIRST OMNIBUS OBJECTION TO CLAIMS**  
**(Incorrectly Classified Claims)**

Upon the thirty-first omnibus objection to reclassify certain claims, dated July 2, 2010 (the “**Thirty-First Omnibus Objection to Claims**”),<sup>1</sup> of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) [Docket No. 4180], seeking entry of an order reclassifying the Incorrectly Classified Claims on the grounds that each Incorrectly Classified Claim was incorrectly classified by the claimant, all as more fully described in the Thirty-First Omnibus Objection to Claims; and due and proper notice of the Thirty-First Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Thirty-First Omnibus Objection to Claims is in the best interests of the

<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Thirty-First Omnibus Objection to Claims.

Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Thirty-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Thirty-First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each “Claim Amount and Priority” listed on **Exhibit “A”** annexed hereto is hereby reclassified as indicated on Exhibit “A” under the column “Modified Priority Status/Reduced Amount;” and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim listed on Exhibit “A” annexed to the Thirty-First Omnibus Objection to Claims under the heading “*Claims to be Reclassified*” that is not reclassified; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2010

\_\_\_\_\_  
United States Bankruptcy Judge

## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
AIRWYKE, BELINDA 56 NORTH CRAWFORD	61669	Motors Liquidation Company	\$7,500.00 (S) \$7,500.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
MILLERSBURG, OH 44654			\$0.00 (P)	\$0.00 (P)		
Official Claim Date: 11/27/2009			\$0.00 (U)	\$15,000.00 (U)		
			\$15,000.00 (T)	\$15,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

ALEX CARCAMO 118 E. ROBINSON ST.	65702	Motors Liquidation Company	\$9,878.90 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
JACKSON, MI 49203 UNITED STATES OF AMERICA			\$4,939.90 (P)	\$0.00 (P)		
Official Claim Date: 11/30/2009			\$0.00 (U)	\$14,818.80 (U)		
			\$14,818.80 (T)	\$14,818.80 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

BELL ANTHONY BELL, ANTHONY PO BOX 111	3416	Motors Liquidation Company	\$1,580.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
EASTON, TX 75641			\$4,005.00 (P)	\$0.00 (P)		
Official Claim Date: 10/5/2009			\$0.00 (U)	\$5,585.00 (U)		
			\$5,585.00 (T)	\$5,585.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

BELL, LAUREN 15633 WEST 11 W ELEVEN MILE ROAD APT 211	60473	Motors Liquidation Company	\$5,000.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
SOUTHFIELD, MI 48076			\$5,000.00 (P)	\$0.00 (P)		
Official Claim Date: 11/27/2009			\$5,000.00 (U)	\$15,000.00 (U)		
			\$15,000.00 (T)	\$15,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
CARTER, CIERRA 4600 TIPSY CIR APT 4203 LOUISVILLE, KY 40216	12136	Motors Liquidation Company	\$4,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 10/19/2009			\$4,000.00 (P)	\$0.00 (P)		
			\$4,000.00 (U)	\$12,000.00 (U)		
			\$12,000.00 (T)	\$12,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

CURTIS PARRISH 6994 BROADWAY 1-A MERRILLVILLE, IN 46410 UNITED STATES OF AMERICA	44082	Motors Liquidation Company	\$2,700.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$3,500.00 (A)	\$0.00 (A)		
Official Claim Date: 11/24/2009			\$0.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$6,200.00 (U)		
			\$6,200.00 (T)	\$6,200.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

CYNTHIA AND ERIC HINTON CYNTHIA HINTON 826 COMMERCE BLVD RIVERDALE, GA 30296	21001	Motors Liquidation Company	\$800.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 10/27/2009			\$800.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$1,600.00 (U)		
			\$1,600.00 (T)	\$1,600.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

DANIEL, KEVIN EUGENE 2107 JAKE ALEX BLVD SOUTH SALISBURY, NC 28146	6463	Motors Liquidation Company	\$2,300.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 10/8/2009			\$2,300.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$4,600.00 (U)		
			\$4,600.00 (T)	\$4,600.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE RECLASSIFIED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference	
DOEGE, SHARON 1004 EVANS ST  NEENAH, WI 54956  Official Claim Date: 10/19/2009	12311	Motors Liquidation Company	\$591.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$591.00 (A)	\$0.00 (A)			
			\$0.00 (P)	\$0.00 (P)			
			\$591.00 (U)	\$1,773.00 (U)			
			\$1,773.00 (T)	\$1,773.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							
DUNCAN, BENJAMIN 207 S 4TH ST  EASLEY, SC 29640  Official Claim Date: 10/19/2009	25503	Motors Liquidation Company	\$2,945.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$3,055.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$6,000.00 (U)			
			\$6,000.00 (T)	\$6,000.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							
DYER ANNIE DYER, ANNIE 300 MILLER ST APT 225  MINDEN, LA 71055  Official Claim Date: 10/14/2009	9884	Motors Liquidation Company	\$1,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$2,000.00 (P)	\$0.00 (P)			
			\$1,000.00 (U)	\$4,000.00 (U)			
			\$4,000.00 (T)	\$4,000.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							
FARREL, THOMAS 1100 ZEBULON LN  SALISBURY, NC 28146  Official Claim Date: 10/21/2009	14257	Motors Liquidation Company	\$3,385.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$3,385.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$6,770.00 (U)			
			\$6,770.00 (T)	\$6,770.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
FLOSI, JOE 14302 IL ROUTE 176	11486	Motors Liquidation Company	\$3,100.00 (S) \$0.00 (A)	\$0.00 (S) \$0.00 (A)	Incorrectly Classified Claim	Pgs. 1-5
WOODSTOCK, IL 60098			\$3,100.00 (P)	\$0.00 (P)		
Official Claim Date: 10/16/2009			\$3,100.00 (U) \$9,300.00 (T)	\$9,300.00 (U) \$9,300.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

FOREMOST INSURANCE COMPANY C/O UNITED SUBRO ASSOCIATES 19634 VENTURA BLVD SUITE 218 FILE #989529 TARZANA, CA 91356 UNITED STATES OF AMERICA	22290	Motors Liquidation Company	\$5,197.95 (S) \$5,197.95 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,395.90 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/9/2009			\$10,395.90 (T)	\$10,395.90 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

FRED LOYA INSURANCE CLAIM # 596-94647 8603 INGRAM RD SAN ANTONIO, TX 78245	1566	Motors Liquidation Company	\$7,074.07 (S) \$0.00 (A) \$7,074.07 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$14,148.14 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 9/28/2009			\$14,148.14 (T)	\$14,148.14 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GALE L SLATES 5344 CORAL AVE CAPE CORAL, FL 33904	20193	Motors Liquidation Company	\$40,000.00 (S) \$0.00 (A) \$40,000.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$80,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 11/6/2009			\$80,000.00 (T)	\$80,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
GALES, TERRY 49 RUSHINGWATER DR  PORTAGE, IN 46368	63417	Motors Liquidation Company	\$2,201.73 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 11/30/2009			\$2,201.73 (P)	\$0.00 (P)		
			\$0.00 (U)	\$4,403.46 (U)		
			\$4,403.46 (T)	\$4,403.46 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GAMBLE, ARNOLD GEICO SBIK 1 GEICO BLVD  FREDERICKSBURG, VA 22412	47935	Motors Liquidation Company	\$8,978.06 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 11/25/2009			\$8,978.06 (P)	\$0.00 (P)		
			\$0.00 (U)	\$17,956.12 (U)		
			\$17,956.12 (T)	\$17,956.12 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GREEN ANTONIO 8912 HILLVIEW  ST. LOUIS, MO 63136 UNITED STATES OF AMERICA	68920	Motors Liquidation Company	\$5,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$5,000.00 (A)	\$0.00 (A)		
Official Claim Date: 11/30/2009			\$0.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$10,000.00 (U)		
			\$10,000.00 (T)	\$10,000.00 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

GUY, RAYE PO BOX 390  UNION, WV 24983	8125	Motors Liquidation Company	\$26,887.83 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 10/12/2009			\$26,887.83 (P)	\$0.00 (P)		
			\$0.00 (U)	\$53,775.66 (U)		
			\$53,775.66 (T)	\$53,775.66 (T)		

Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

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## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
HAIRSTON, MARLON 915A ROYAL DR	25359	Motors Liquidation Company	\$3,810.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
MARTINSVILLE, VA 24112			\$3,810.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$7,620.00 (U)		
Official Claim Date: 11/13/2009			\$7,620.00 (T)	\$7,620.00 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						
HAMLET BILLIE HAMLET, BILLIE 6017 WONDER DR	10843	Motors Liquidation Company	\$2,500.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
FORTH WORTH, TX 76133			\$8,069.40 (P)	\$0.00 (P)		
			\$90.00 (U)	\$10,659.40 (U)		
Official Claim Date: 10/15/2009			\$10,659.40 (T)	\$10,659.40 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						
HARRIS, ELLA 215 LAKELAND DR	3439	Motors Liquidation Company	\$3,500.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
BRANDON, MS 39042			\$3,500.00 (P)	\$0.00 (P)		
			\$3,500.00 (U)	\$10,500.00 (U)		
Official Claim Date: 10/5/2009			\$10,500.00 (T)	\$10,500.00 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						
HEARD, KENNETH 1434 KENILWORTH DR SW	26763	Motors Liquidation Company	\$3,130.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
ATLANTA, GA 30310			\$3,130.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$6,260.00 (U)		
Official Claim Date: 11/16/2009			\$6,260.00 (T)	\$6,260.00 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						

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## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
HEFNER, JOSEPH 1908 W THOMAN ST  SPRINGFIELD, MO 65803  Official Claim Date: 10/8/2009	6538	Moters Liquidation Company	\$2,105.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$2,105.00 (P)	\$0.00 (P)		
			\$2,105.00 (U)	\$6,315.00 (U)		
			\$6,315.00 (T)	\$6,315.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
HERNANDEZ, LAURI 206 FOLK ST  POTTERVILLE, MI 48876  Official Claim Date: 11/17/2009	29590	Moters Liquidation Company	\$4,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$4,000.00 (P)	\$0.00 (P)		
			\$4,000.00 (U)	\$12,000.00 (U)		
			\$12,000.00 (T)	\$12,000.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
HOLLOWAY, JAMELL D 8257953 C/O INGENIX ATTN: RICHARD RIKHUS 12125 TECHNOLOGY DR EDEN PRAIRIE, MN 55344  Official Claim Date: 10/19/2009	12689	Moters Liquidation Company	\$4,128.17 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$4,128.17 (P)	\$0.00 (P)		
			\$0.00 (U)	\$8,256.34 (U)		
			\$8,256.34 (T)	\$8,256.34 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
HOWE PATRICIA 3320 AIRPORT ROAD 19  NAMP, ID 83687  Official Claim Date: 11/12/2009	22830	Moters Liquidation Company	\$997.39 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$997.39 (P)	\$0.00 (P)		
			\$0.00 (U)	\$1,994.78 (U)		
			\$1,994.78 (T)	\$1,994.78 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						

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## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
IDRISSOU, TRAORE & ELOMMI AGBETO 500 N VALLEY DR UNIT 204 DES MOINES, IA 50312	61259	Motors Liquidation Company	\$11,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 11/27/2009			\$11,000.00 (P)	\$0.00 (P)		
			\$100,000.00 (U)	\$122,000.00 (U)		
			\$122,000.00 (T)	\$122,000.00 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						
IRISH, DIANNE 34939 3RD AVE LOT 65 LEESBURG, FL 34788	15439	Motors Liquidation Company	\$2,500.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 10/24/2009			\$1,500.00 (P)	\$0.00 (P)		
			\$2,500.00 (U)	\$6,500.00 (U)		
			\$6,500.00 (T)	\$6,500.00 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						
JACKIE ADENIYI 9701 S. WINSTON CHICAGO, IL 60643 UNITED STATES OF AMERICA	44386	Motors Liquidation Company	\$794.28 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 11/24/2009			\$264.76 (P)	\$0.00 (P)		
			\$0.00 (U)	\$1,059.04 (U)		
			\$1,059.04 (T)	\$1,059.04 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						
JOHN ALLEN 6424 MAPLEBROOK LN FLINT, MI 48507	65242	Motors Liquidation Company	\$90,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
Official Claim Date: 11/30/2009			\$266,178.88 (P)	\$0.00 (P)		
			\$0.00 (U)	\$356,178.88 (U)		
			\$356,178.88 (T)	\$356,178.88 (T)		
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>						

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## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
KRISTI BERRYHILL 268 W. 7800 N.  SMITHFIELD, UT 84335 UNITED STATES OF AMERICA	37610	Motors Liquidation Company	\$2,500.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$2,500.00 (A)	\$0.00 (A)		
			\$0.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$5,000.00 (U)		
Official Claim Date: 11/23/2009			\$5,000.00 (T)	\$5,000.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
LAMONT GIBSON 1044 HOMESTEAD RD  SOUTH EUCLID, OH 44121 UNITED STATES OF AMERICA	18890	Motors Liquidation Company	\$1,900.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$1,900.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$3,800.00 (U)		
Official Claim Date: 11/2/2009			\$3,800.00 (T)	\$3,800.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
MARK SWEDLOW PO BOX 241  GLENORA, CA 91740 UNITED STATES OF AMERICA	61550	Motors Liquidation Company	\$2,300.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$2,300.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$4,600.00 (U)		
Official Claim Date: 11/27/2009			\$4,600.00 (T)	\$4,600.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
MENILLA MAYRA MENILLA, MAYRA 12049 LOWEMONT ST  NORWALK, CA 90650	12661	Motors Liquidation Company	\$3,500.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$3,500.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$7,000.00 (U)		
Official Claim Date: 10/19/2009			\$7,000.00 (T)	\$7,000.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						

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CLAIMS TO BE RECLASSIFIED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference	
MICHAEL BUCKMAN 825 SOUTHWEST TULIP BOULEVARD  FORT ST. LUCY, FL 34953 UNITED STATES OF AMERICA	38832	Motors Liquidation Company	\$1,889.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$1,889.00 (P)	\$0.00 (P)			
			\$1,889.00 (U)	\$5,667.00 (U)			
Official Claim Date: 11/23/2009			\$5,667.00 (T)	\$5,667.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							
MOORE, ASHLEY 1919 S NEBRASKA ST  MARION, IN 46953	22275	Motors Liquidation Company	\$10,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$13,200.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$23,200.00 (U)			
Official Claim Date: 11/9/2009			\$23,200.00 (T)	\$23,200.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							
MORGAN, CHARLES 3212 HARVEY RD  BARTLESVILLE, OK 74006	3137	Motors Liquidation Company	\$16,182.39 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$16,182.39 (P)	\$0.00 (P)			
			\$16,182.39 (U)	\$48,547.17 (U)			
Official Claim Date: 10/5/2009			\$48,547.17 (T)	\$48,547.17 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							
MORGAN, CONNIE 1840 N ERIE ST APT 2  TOLEDO, OH 43611	44380	Motors Liquidation Company	\$5,373.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
			\$5,373.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$10,746.00 (U)			
Official Claim Date: 11/24/2009			\$10,746.00 (T)	\$10,746.00 (T)			
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.							

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## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
NISM 2008 NO PHYSICAL FILES ARE CREATED WEBB, BILLY 8836 EVANSTON WAY RAYTOWN, MO 64138	14490	Moters Liquidation Company	\$1,575.17 (S) \$0.00 (A) \$1,575.17 (P) \$1,575.17 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,725.51 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/22/2009			\$4,725.51 (T)	\$4,725.51 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
SAUNDRA ROBERTS 15505 LINDSAY ST DETROIT, MI 48227	1336	Moters Liquidation Company	\$10,000.00 (S) \$0.00 (A) \$15,000.00 (P) \$15,000.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$40,000.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 9/4/2009			\$40,000.00 (T)	\$40,000.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
SHORES, ROBERT 3001 LLEWELLYN AVE APT 2 NORFOLK, VA 23504	5625	Moters Liquidation Company	\$2,135.11 (S) \$0.00 (A) \$2,135.11 (P) \$1,129.78 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,400.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/7/2009			\$5,400.00 (T)	\$5,400.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
SMILEY, GRANDCHILD SMILEY, GRANDCHILD ARIZYAN ELCO ADMINISTRATIVE SERVICES COMPANY BOX 4800 WAYNE, NJ 07474	10725	Moters Liquidation Company	\$400.00 (S) \$4,000.00 (A) \$0.00 (P) \$0.00 (U)	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$4,400.00 (U)	Incorrectly Classified Claim	Pgs. 1-5
Official Claim Date: 10/15/2009			\$4,400.00 (T)	\$4,400.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO BE RECLASSIFIED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference	
SMITH, CHEIW 135 MAIN ST  RICHMONDVILLE, NY 12149	33527	Moters Liquidation Company	\$2,500.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
Official Claim Date: 11/21/2009			\$5,500.00 (P)	\$0.00 (P)			
			\$5,500.00 (U)	\$13,500.00 (U)			
			\$13,500.00 (T)	\$13,500.00 (T)			
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>							
SMITH, TAMARA 1633 WASHINGTON AVE APT E  FORT WORTH, TX 76104	21061	Moters Liquidation Company	\$25,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
Official Claim Date: 10/28/2009			\$25,000.00 (P)	\$0.00 (P)			
			\$25,000.00 (U)	\$75,000.00 (U)			
			\$75,000.00 (T)	\$75,000.00 (T)			
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>							
TAYLOR, CEDRIC 143 POPLAR ST  COLUMBUS, MS 39702	33407	Moters Liquidation Company	\$2,915.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
Official Claim Date: 11/21/2009			\$2,915.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$5,830.00 (U)			
			\$5,830.00 (T)	\$5,830.00 (T)			
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>							
TOUSSAINT, GUY 2430 NW 137TH TIER  SUNRISE, FL 33323	14420	Moters Liquidation Company	\$10,000.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
			\$0.00 (A)	\$0.00 (A)			
Official Claim Date: 10/22/2009			\$10,000.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$20,000.00 (U)			
			\$20,000.00 (T)	\$20,000.00 (T)			
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>							

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(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

## CLAIMS TO BE RECLASSIFIED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference
WEALTH, SHEBETH 6816 S DORCHESTER AVE APT 2A  CHICAGO, IL 60637  Official Claim Date: 10/20/2009	13219	Moters Liquidation Company	\$18,736.52 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$5,048.00 (A)	\$0.00 (A)		
			\$0.00 (P)	\$0.00 (P)		
			\$8,640.52 (U)	\$32,425.04 (U)		
			\$32,425.04 (T)	\$32,425.04 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
WICHMAN, TERRANCE R 1771 NORTH LAKE DR  TROY, MI 48083  Official Claim Date: 11/30/2009	65136	Moters Liquidation Company	\$1,709.92 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$1,709.92 (P)	\$0.00 (P)		
			\$0.00 (U)	\$3,419.84 (U)		
			\$3,419.84 (T)	\$3,419.84 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
WRIGHT ADRIAN WRIGHT, ADRIAN 11510 GIBBENS RD  BATON ROUGE, LA 70807  Official Claim Date: 10/9/2009	7626	Moters Liquidation Company	\$34,070.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$34,070.00 (A)	\$0.00 (A)		
			\$0.00 (P)	\$0.00 (P)		
			\$0.00 (U)	\$68,140.00 (U)		
			\$68,140.00 (T)	\$68,140.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						
YATES BEVERLY L. 52 W 10TH ST  WELLSTON, OH 45692  Official Claim Date: 11/20/2009	31215	Moters Liquidation Company	\$6,721.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5
			\$0.00 (A)	\$0.00 (A)		
			\$6,721.00 (P)	\$0.00 (P)		
			\$3,425.00 (U)	\$16,867.00 (U)		
			\$16,867.00 (T)	\$16,867.00 (T)		
Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.						

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CLAIMS TO BE RECLASSIFIED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Modified Priority Status/Reduced Amount	Grounds For Objection	Objection Page Reference	
YOUNGBLOOD GLORIA	19879	Motors	\$2,300.00 (S)	\$0.00 (S)	Incorrectly Classified Claim	Pgs. 1-5	
YOUNGBLOOD, GLORIA 3634 HESS AVE APT E		Liquidation Company	\$0.00 (A)	\$0.00 (A)			
SAGINAW, MI 48601			\$2,300.00 (P)	\$0.00 (P)			
			\$0.00 (U)	\$4,600.00 (U)			
Official Claim Date: 11/5/2009			\$4,600.00 (T)	\$4,600.00 (T)			
<p>Note: This claim arises from litigation against the Debtors. It is not entitled to priority status, it is not entitled an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code, and it is not secured by property of the Debtors' estates. Accordingly, this claim should be reclassified as a non-priority, general unsecured claim.</p>							
<b>Claim Totals</b>	<b>53</b>		<b>\$430,291.49 (S)</b>	<b>\$0.00 (S)</b>			
			<b>\$67,406.95 (A)</b>	<b>\$0.00 (A)</b>			
			<b>\$543,610.78 (P)</b>	<b>\$0.00 (P)</b>			
			<b>\$204,227.86 (U)</b>	<b>\$1,245,537.08 (U)</b>			
			<b>\$1,245,537.08 (T)</b>	<b>\$1,245,537.08 (T)</b>			

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