

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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: :
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)
: :
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: :
KELLY CASTILLO, NICHOLE BROWN, : Adv. Proc. No. 09-00509
: BRENDA ALEXIS DIGIAN DOMENICO, :
: VALERIE EVANS, BARBARA ALLEN, : Return Date: May 6, 2010
: STANLEY OZAROWSKI, AND DONNA :
SANTI, : Time: 9:45 a.m.
: Plaintiffs, :
: v. :
General Motors Company, f/k/a New General :
Motors Company, Inc., :
: Defendant. :
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: :
GENERAL MOTORS LLC, :
: Counterclaimant, :
: :
v. :
: :
KELLY CASTILLO, NICHOLE BROWN, :
: BRENDA ALEXIS DIGIAN DOMENICO, :
: VALERIE EVANS, BARBARA ALLEN, :
: STANLEY OZAROWSKI, DONNA SANTI, :
LAKINCHAPMAN LLC, ROBERT W. :
SCHMIEDER, II, AND MARK L. BROWN, :
: Counterdefendants. :
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**NEW GM'S MEMORANDUM IN OPPOSITION TO
ATTORNEY COUNTERDEFENDANTS' MOTION TO DISMISS COUNTERCLAIMS**

Defendant and Counterclaimant General Motors LLC ("New GM") respectfully submits this memorandum in opposition to the Motion To Dismiss Counterclaims filed by

counterdefendants Robert W. Schmieder II, Mark L. Brown and LakinChapman LLC
("Counterdefendants' Motion).

Because this motion is a virtual carbon copy of the Motion To Dismiss previously filed by plaintiffs, and in order not to burden the Court with a duplicative filing, New GM for its opposition to Counterdefendants' Motion hereby incorporates by reference, as if fully set forth herein, its Memorandum in Opposition to Plaintiffs' Motion To Dismiss Counterclaims filed herein on or about January 22, 2010.

New York, New York
Dated: March 2, 2010

/s/ Gregory R. Oxford

ISAACS CLOUSE CROSE & OXFORD LLP
21515 Hawthorne Boulevard, Suite 950
Torrance, California 90503
Telephone: (310) 316-1990
Facsimile: (310) 316-1330

Attorneys for General Motors LLC



Tana Burton

From: Docket
Sent: Tuesday, March 02, 2010 5:12 PM
To: Tana Burton
Subject: FW: 09-00509-reg Memorandum of Law

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U.S. Bankruptcy Court

Southern District of New York

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Case Name: Castillo et al v. General Motors Company
Case Number: 09-00509-reg
Document Number: 37

Docket Text:

Memorandum of Law *In Opposition to Motion to Dismiss Counterclaims* filed by Gregory Oxford on behalf of General Motors Company. (Oxford, Gregory)

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:Opposition to Counterdefendants' Motion To Dismiss.pdf

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[STAMP NYSBStamp_ID=842906028 [Date=3/2/2010] [FileNumber=7504134-0] [bca46cdc367584d2f4f0117cdf636796cf9b2ff4e11db64ed6d75647e967b67a534a9f4b44c595ce8b5a05e626a935d23a052d3ced13e570a14beba2fff3826f]]

09-00509-reg Notice will be electronically mailed to:

Mark L. Brown on behalf of Counter-Defendant LakinChapman LLC
markb@lakinchapman.com, ashleyo@lakinchapman.com; docket@lakinchapman.com

Gregory Oxford on behalf of Counter-Claimant General Motors Company
goxford@icclawfirm.com

Jeffrey S. Stein on behalf of Claims and Noticing Agent Garden City Group
Kenneth_Freda@gardencitygroup.com,
jennifer.keough@gardencitygroup.com; PACERTeam@gardencitygroup.com

S. Alyssa Young on behalf of Plaintiff Barbara Allen
ayoung@leaderberkon.com

09-00509-reg Notice will not be electronically mailed to:

Ian Connor Bifferato on behalf of Plaintiff Barbara Allen
Bifferato LLC
800 N. King Street
First Floor
Wilmington, DE 19801

Mark L. Brown
,

Clerk's Office of the United States Bankruptcy Court
One Bowling Green
New York, NY 10004

Robert W. Schmieder
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