

6. Additional Claim Objection Procedures. In addition to the Rule 3007

Modifications set forth above, the following Claim Objection Procedures shall govern all Claim Objections and any resulting contested matters:

(a) Briefing Schedule.

(i) Any Claim Objection shall be filed and served² at least 35 calendar days before an omnibus hearing to be heard at that omnibus hearing, and may be served by U.S. mail without requiring the additional days provided for under Bankruptcy Rule 9006(f). The notice of Claim Objection that the Debtors serve on each applicable Claim holder shall be individualized to the applicable Claim(s) to provide the notice information required under Bankruptcy Rule 3007 and shall include a copy of this Order. The Debtors may assert Claim Objections against Proofs of Claim and/or Unsuperseded Scheduled Claims.

(ii) Except as may be otherwise established by either the Claim Objection, an agreement of the applicable parties or an order of the Court, (i) any Response to a Claim Objection shall be filed and served no later than 4:00 p.m. (New York time) on the last business day that is at least 15 calendar days before the omnibus hearing and (ii) any Reply shall be filed and served no later than 12:00 p.m. (New York time) on the day that is three business days before the omnibus hearing.

(iii) There shall be no sur-reply unless the Court orders otherwise upon the filing of a motion demonstrating good cause.

(b) Orders; Hearing.

(i) If no Response to a Claim Objection is timely filed and served by the established deadline with respect to any particular Claim(s), the Debtors may submit a form of order sustaining the Claim Objection with respect to such Claim(s) without any further notice or hearing.

(ii) If a timely Response is filed with respect to a Claim Objection, the initial omnibus hearing on the contested portion of the Claim Objection shall not be an evidentiary hearing unless the Claim Objection expressly provides, the applicable parties agree or the Court orders otherwise.

(iii) If an order resolving a Claim Objection contains an error, the Debtors and the Claim holder jointly may submit for the Court's consideration an amended, corrected or replacement order concerning such Claim without further notice or hearing.

(c) Proofs of Claim. A Claim Objection need not include copies of the Proof(s) of Claim subject to the Claim Objection.

(d) Claim Objection Status Reports. Pending Claim Objections shall be identified at least by title and docket number in each Hearing Agenda. Hearing Agendas are not required to indicate deadline extensions, hearing adjournments, resolutions, entry of earlier orders, status or other details with respect to pending contested Claim Objections and any of the Claims and claimants affected therein, provided that the Debtors attach as an exhibit to each applicable Hearing Agenda a status report, indicating, with respect to each contested Claim Objection, the following information regarding each opposing Claim holder and applicable Claim — (i) the Claim holder's name, Claim number, asserted Claim amount and asserted Claim priority; (ii) the Debtor(s) against which the Claim is asserted; (iii) the grounds of objection to the Claim (*e.g.*, duplicate, untimely, *etc.*); and (iv) the status of the matter for the omnibus hearing (*e.g.*, adjourned, resolved in principle, resolved and reduced to proposed order to be submitted, contested with hearing to go forward, *etc.*).

7. Claim Settlement Procedures. The following Claim Settlement

Procedures are hereby approved and established:

(a) Settlements. Whether or not a Proof of Claim or Unsuperseded Scheduled Claim is subject to a pending Claim Objection, the Debtors may agree in writing with the Claim holder to the resolution of such Claim within the

parameters and subject to the procedures set forth below for Permitted Settlements and Reduced Notice Settlements.

- (b) Permitted Settlements. Permitted Settlements may provide for the following resolutions without further Court approval, subject to the notice procedures set forth below:
- (i) the allowance of the Claim or any portion of the Claim either in its asserted amount or a reduced amount if, in either case, the resolved amount of the Claim is a secured, administrative expense or priority amount of \$100,000 or less, and/or a general unsecured nonpriority amount of \$600,000 or less; *provided, however*, that no such Permitted Settlement may (A) allow any Claim of New Chrysler or any present or former insider of the Debtors (any such settlement, a "Specialized Settlement") or (B) release any claim(s) the Debtors may have under chapter 5 of the Bankruptcy Code;
 - (ii) the reclassification of the Claim or any portion of the Claim, irrespective of amount, from secured, administrative expense or priority to general unsecured nonpriority, *provided, however*, that the Debtors' and any other party's right to object further to any such reclassified Claim or applicable portion of the Claim on any available grounds remains preserved; and/or
 - (iii) the withdrawal or disallowance and expungement of the Claim.
- (c) Notice of Permitted Settlements. The Debtors shall file Permitted Settlement Notices no less often than promptly following their entry into of every 100 Permitted Settlements. Each Permitted Settlement Notice shall set forth the following information with respect to each included Permitted Settlement: (i) the Claim holder's name, (ii) the Claim number(s), (iii) the asserted amount(s) and priority of the applicable Claim(s); (iv) the Debtor(s) against which the applicable Claim(s) is or are asserted; and (v) the resolution of the Claim(s) under the Permitted Settlement.
- (d) Reduced Notice Settlements. Reduced Notice Settlements may provide for the allowance of the Claim or any portion of the Claim either in its asserted amount or a reduced amount if, in either case, the resolved amount of the Claim is a secured, administrative expense or priority amount of \$1,000,000 or less, and/or a general unsecured nonpriority amount of \$5,000,000 or less (and in either case is not otherwise a Permitted Settlement), subject to the notice and approval procedures set forth below.
- (e) Applications for Approval of Reduced Notice Settlements. The Debtors shall file Settlement Applications seeking the approval of all Reduced

Notice Settlements summarized in each such Settlement Application. The Debtors shall file such Settlement Applications no less often than promptly following their entry into of every 100 Reduced Notice Settlements. Each Settlement Application shall set forth the following information with respect to each included Reduced Notice Settlement: (i) the Claim holder's name, (ii) the Claim number(s), (iii) the asserted amount(s) and priority of the applicable Claim(s); (iv) the Debtor(s) against which the applicable Claim(s) is or are asserted; and (v) the resolution of the Claim(s) under the Reduced Notice Settlement.

- (f) Objections to Reduced Notice Settlements. Settlement Applications shall be filed and served³ upon at least ten days' notice of presentment under the Local Bankruptcy Rules for the Southern District of New York, during which time parties in interest may file and serve written Settlement Objections to any Reduced Notice Settlement included in the pending Settlement Application. If no timely Settlement Objection is filed and served with respect to the approval of any Reduced Notice Settlement included in the pending Settlement Application, the Debtors shall submit an omnibus order for entry by the Court approving such uncontested Reduced Notice Settlements on a final and binding basis without further motion, notice or hearing. Any timely Settlement Objection and the applicable Reduced Notice Settlement(s) shall be set for hearing at the next omnibus hearing in these cases that is at least five business days following service of the Settlement Objection.
- (g) Withdrawal of Claims. Whether or not a Claim Objection is pending against a Claim, the holder of the Claim may withdraw the Claim with prejudice upon obtaining the Debtors' consent to such withdrawal, without regard to the requirements of Bankruptcy Rule 3006.
- (h) Settlement Notifications to Creditors' Committee. No less frequently than once per month beginning in December, 2009, the Debtors shall notify (each, a "Settlement Notification") the official committee of unsecured creditors (the "Creditors' Committee") of each Permitted Settlement and Reduced Notice Settlement (including express identification of any Specialized Settlements) entered into since the preceding Settlement Notification. In addition, no Permitted Settlement may be included in a Permitted Settlement Notice and no Reduced Notice Settlement may be included in a Settlement Application unless the Debtors shall have notified the Creditors' Committee of such Permitted Settlement or Reduced Notice Settlement, whether by Settlement Notification or otherwise, no fewer than five days before the filing of the Permitted Settlement Notice or the Settlement Application.

³ With respect to any transferred Claim(s), notice of an Settlement Application shall be sufficient if provided to the transferor(s) of such Claim(s) unless such transfer has become final pursuant to Bankruptcy Rule 3001(e) at least two business days prior to the service of the Settlement Application.