

Motors Liquidation Company, et al.

PLEASE NOTE THAT THIS INFORMATION IS SUBJECT TO CHANGE AND CANNOT BE RELIED ON AS THE ACTUAL AMOUNT OF UNSECURED CLAIMS THAT WILL BE ALLOWED OR RESERVED FOR.

PLEASE FURTHER NOTE THAT THIS INFORMATION REPRESENTS THE CREDITORS' COMMITTEE'S VIEW ON UNSECURED CLAIMS BASED ON ANALYSIS TO DATE, AND SUCH INFORMATION IS NOT ENDORSED BY THE DEBTORS.

Unsecured Claims as of December 1, 2010			Estimated Range ²		
In US\$ billions	Remaining Claims ¹		Low	-	High
	Total	Count			
Category					
Debt	\$30.0	34	\$28.3	-	\$29.9
Environmental	4.8	275	1.0	-	2.0
Asbestos	2.9	28,563	0.1	-	2.0
Litigation	3.3	2,505	1.5	-	2.5
Employee	1.0	4	1.0	-	1.3
Executory Contracts	1.6	221	0.8	-	1.6
Accounts Payable	0.1	749	0.0	-	0.1
Workers Compensation	0.0	19	0.0	-	0.0
Other ³	0.1	120	0.0	-	0.0
Total	\$43.7	32,490	\$32.7	-	\$39.4

Notes:

(1) Claims remaining after pending and anticipated future objections.

(2) There is a potential for an additional unsecured claim of up to approximately \$1.5 billion if the Committee is successful in the Term Loan Adversary Proceeding.

(3) Includes Tax, Equityholders, Customers and Other.