

Hearing Date: September 27, 2007
Hearing Time: 10:00 a.m. (prevailing Eastern time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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      In re      : Chapter 11
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DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)
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                : Debtors. : (Jointly Administered)
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PROPOSED TWENTY-SECOND OMNIBUS HEARING AGENDA

Location Of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton Custom House, Room 610, 6th Floor, One
Bowling Green, New York, New York 10004-1408

The matters set for hearing are divided into the following categories for the purposes of this



Proposed Agenda:

- A. Introduction
- B. Continued Or Adjourned Matters (3 Matters)
- C. Uncontested, Agreed, Or Settled Matters (3 Matters)
- D. Contested Matters (4 Matters)

B. Continued Or Adjourned Matters¹

1. **"Marsilli Late-Filing Motion"** – Motion Of Marsilli & Co. S.P.A. For An Enlargement Of Time For Filing Proof Of Claim Pursuant To Rule 9006(b) Of The Federal Rules Of Bankruptcy Procedure (Docket No. 9113)

Responses Filed: *Debtors' Objection To Motion Of Marsilli & Co. S.P.A. For An Enlargement Of Time For Filing Proof Of Claim Pursuant To Rule 9006(b) Of The Federal Rules Of Bankruptcy Procedure (Docket No. 9479)*

Reply Filed: *None.*

Related Filings: *Declaration Of Anna Maria Cottarelli In Support Of Motion Of Marsilli & Co. S.P.A. For An Enlargement Of Time For Filing Proof Of Claim Pursuant To Rule 9006 (b) Of The Federal Rules Of Bankruptcy Procedure (Docket No. 9367)*

Declaration Of Noticing Agent Regarding Service Of Bar Date Notice On Marsilli & Co. S.P.A. (Docket No. 9606)

¹ Motions found at the following docket numbers that appeared on previous Proposed Hearing Agendas have been voluntarily withdrawn from the agenda and would need to be re-noticed under the Case Management Order to be reinstated on an agenda: Docket Nos. 213, 4778, 4912, 5153, 6723, and 6690 (KECP Emergence Incentive Program, Mercedes-Benz U.S. International, Inc.'s Motion to File Claims, Methode Electronics, Inc.'s Setoff Motion, Computer Patent Annuities Limited's Motion To Assume Or Reject Executory Contract, Motion Of Sumida America Inc. To Allow Setoff/Recoupment And For Relief From Automatic Stay, and ATEL Leasing Corporation's Motion To Allow Administrative Claim respectively). In addition, the following adversary proceedings have also been withdrawn from the agenda and would be subject to re-noticing to be reinstated on a hearing agenda: NYCH LLC d/b/a RCS Computer Experience Adv. Pro. No. 06-01902, Docket No. 1 (Complaint To Recover Property Of The Estate), L&W Engineering Adv. Pro. No. 06- 01136, Docket No. 22 (Motion For Summary Judgment), Aksys Ltd. Adv. Pro. No. 06-01677, Docket No. 2 (Summons And Notice), and National Union Fire Insurance Company Of Pittsburgh, PA Adv. Pro. No. 07-01435, Docket No. 1 (Declaratory Judgment).

Status: *By agreement of the parties this matter is being adjourned to the September 28, 2007 claims hearing.*

2. **"Arkema Late-Filing Motion"** – Arkema Inc.'s Motion For Leave To File Late Claim (Docket No. 9272)

Responses Filed: *Debtors' Objection To Arkema Inc.'s Motion For Leave To File Late Claim (Docket No. 9480)*

Reply Filed: *None.*

Related Filings: *Declaration Of John Lutz In Support Of Arkema Inc.'s Motion For Leave To File Late Claim (Docket No. 9554)*

Status: *By agreement of the parties this matter is being adjourned to the September 28, 2007 claims hearing.*

3. **"MDL And Insurance Settlement Approval Motion"** – Motion For Order Approving Multidistrict Litigation And Insurance Settlements (Docket No. 9296)

Responses Filed: *None.*

Reply Filed: *None.*

Related Filings: *None.*

Status: *By agreement of the parties this matter is being adjourned to the October 3, 2007 hearing.*

C. Uncontested, Agreed, Or Settled Matters

4. **"GM Warranty Settlement Motion"** – Motion For Order Under 11 U.S.C. § 363(b) And Fed. R. Bankr. P. 6004 And 9019 Authorizing And Approving Entry Into And Performance Of Warranty, Settlement, And Release Agreement And Covenant Not To Sue With General Motors Corporation (Docket No. 9294)

Responses Filed: *None.*

Reply Filed: *None.*

Related Filings: *Ex Parte Application Under 11 U.S.C. § 107(b) And Fed. R. Bankr. P. 9018 For Order Authorizing*

Debtors To File Redacted Version Of Warranty Settlement Agreement (Docket No. 9267)

Order Under 11 U.S.C. § 107(b) And Fed. R. Bankr. P. 9018 Authorizing Debtors To File Redacted Version Of Warranty Settlement Agreement (Docket No. 9268)

Status: The hearing with respect to this matter will be proceeding.

5. **"Motion To Amend Reclamation Procedures"** – Motion Under 11 U.S.C. § 105(a) And 546 And Fed. R. Bankr. P. 9019 For Order Amending And Restating Amended Final Order Under 11 U.S.C. §§ 362, 503, And 546 And Fed. R. Bankr. P. 9019 Establishing Procedures For The Treatment Of Reclamation Claims (Docket No. 9295)

Responses Filed: None.

Reply Filed: None.

Related Filings: Amended Final Order Under 11 U.S.C. §§ 362, 503, And 546 And Fed. R. Bankr. P. 9019 Establishing Procedures For The Treatment Of Reclamation Claims (Docket No. 881)

Status: The hearing with respect to this matter will be proceeding.

6. **"GM License Agreement Motion"** – Expedited Motion For Order Under 11 U.S.C. § 363(b) And Fed. R. Bankr. P. 6004 Authorizing And Approving Entry Into And Performance Of License Agreement With General Motors Global Technology Operations, Inc. And General Motors Corporation (Docket No. 9370)

Response filed: None.

Reply filed: None.

Related filings: Reservation Of Rights By The Official Committee Of Unsecured Creditors Regarding The Expedited Motion For Order Under 11 U.S.C. § 363(b) And Fed. R. Bankr. P. 6004 Authorizing And Approving Entry Into And Performance Of License Agreement With General Motors Global Technology Operations, Inc. And General Motors Corporation (Docket No. 9563)

Status: *The hearing with respect to this matter will be proceeding.*

D. Contested Matters

7. **"Twentieth Omnibus Claims Objection"** – Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claim, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9151)

*Response Filed:*² *Response To Debtors' Twentieth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected In The Debtors' Books And Records, (D) Untimely Claims, And (E) Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9333)*

Response Of The State Of Michigan, Department Of Treasury To Debtors' 20th Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. Bankr. P. 3007 To Certain (C) Claims Not Reflected On The Debtors' Books And Records, And (E) Tax Claims Subject To Modification (Docket No. 9337)

The State Of New Jersey, Division Of Taxation's Response Of No Objection To Debtors' Twentieth Omnibus Objection To Claims (Docket No. 9354)

² Responses listed in bold were filed after the September 20, 2007 4:00 p.m. (prevailing Eastern time) objection deadline established under the *Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claim, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification* (Docket No. 9151).

Response Of Exxonmobil Oil Corporation To Debtors' Twentieth Omnibus Objection To Claims (Docket No. 9364)

Response Of Hewlett Packard Company To Debtors' Twentieth Omnibus Objection To The Allowance Of Certain Claims (Docket No. 9365)

Response Of Flambeau Inc. To Debtors' Twentieth Omnibus Objection To Claims (Claim # 12212) (Docket No. 9390)

Claimant's Response To Debtors' Objection To Proofs Of Claim Filed By RLI Insurance Company (Docket No. 9391)

Response Of Hewlett Packard Financial Services Company To Debtors' Twentieth Omnibus Objection To The Allowance Of Certain Claims (Docket No. 9401)

Response Of The New York State Department Of Taxation And Finance To Debtors' Twentieth Omnibus Objection To Certain Claims (Docket No. 9402)

Fujitsu Ten Corp. Of America's Response To Debtors' Twentieth Omnibus Claims Objection (Docket No. 9403)

Response Of Infineon Technologies North America Corp. To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Educued Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9404)

Response Of Siemens AG To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate

And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9405)

Response Of Siemens Aktiengesellschaft To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9406)

Southwest Research Institute's Response To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. §502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims(Sic), And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedure Claims Subject To Modification (Docket No. 9407)

Response Of Motorola, Inc. To The Debtors' Twentieth Omnibus Objection To Claims (Docket No. 9418)

Response And Limited Opposition Of Essex Group, Inc. To Debtors' Twentieth Omnibus Claims Objection (Docket No. 9419)

Response Of SPS Technologies, LLC A/K/A SPS Technologies-Cleveland, NSS Technologies, Inc. SPS Technologies Waterford Company And Greer

*Stop Nut, Inc. To Debtors' Twentieth Omnibus
Claims Objection (Docket No. 9422)*

*Response And Objection Of Deutsche Bank
Securities Inc. To Debtors' Twentieth Omnibus
Objection Pursuant To 11 U.S.C. § 502(b) And Fed.
R. Bankr. P. 3007 To Certain (A) Duplicative And
Amended Claims, (B) Insufficiently Documented
Claims, (C) Claims Not Reflected On Debtors' Books
And Records, (D) Untimely Claims, And (E) Claims
Subject To Modification, Tax Claims Subject To
Modification, Modified Claims Asserting
Reclamation, Consensually Modified And Reduced
Tort Claims, And Lift Stay Procedures Claims
Subject To Modification (Docket No. 9424)*

*Response Of Guide Corporation To Debtors'
Twentieth Omnibus Objection Pursuant To 11 U.S.C.
§ 502(b) And Fed. R. Bankr. P. 3007 To Certain (A)
Duplicate And Amended Claims, (B) Insufficiently
Documented Claims, (C) Claims Not Reflected On
Debtors' Books And Records, (D) Untimely Claim
[Sic], And (E) Claims Subject To Modification, Tax
Claims Subject To Modification, Modified Claims
Asserting Reclamation, Consensually Modified And
Reduced Tort Claims, And Lift Stay Procedures
Claims Subject To Modification (Docket No. 9426)*

*Response Of Contrarian Funds, LLC To Debtors'
Twentieth Omnibus Claims Objection (Docket No.
9444)*

*Response Of FCI USA, Inc. And Affiliates To
Debtors' Twentieth Omnibus Objection To Claims
(Claim Nos. 14125, 14126, 14127, 14128, 14129,
14130 And 14042) (Docket No. 9446)*

*Response Of United Telephone Company Of Ohio To
Debtors' Twentieth Omnibus Objection To Claims
(Docket No. 9447)*

*Response Of GE Consumer & Industrial F/K/A GE
Lighting To Debtors' Twentieth Omnibus Claims
Objection (Docket No. 9448)*

*Response And Objection Of TT Electronics OPTEK
Technology Corporation To Debtors' Twentieth*

Omnibus Claims Objection Regarding Claim No. 9037 (Docket No. 9449)

Response And Objection Of AB Automotive Electronics Ltd. To Debtors' Twentieth Omnibus Claims Objection Regarding Claim No. 9120 (Docket No. 9450)

Response Of Federal-Mogul Corporation To Debtors' Twentieth Omnibus Objection To Claims (Claim No. 1111) (Docket No. 9453)

Response Of Energy Conversion Systems To Debtors' Twentieth Omnibus Objection To Claims (Docket No. 9454)

Response Of United Plastics Group, As Claimant To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9459)

Response Of Cingular Wireless N/K/A AT&T Mobility LLC To Debtors' Twentieth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claim, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification (Docket No. 9460)

Response Of Texas Instruments Incorporated To Debtors' Twentieth Omnibus Claims Objection (Docket No. 9465)

Ohio Department Of Taxation's Response To Debtors' Twentieth Omnibus Objection To Claims (Docket No. 9468)

Response Of Hitachi Chemical (Singapore) Pte. Ltd. To Twentieth Omnibus Objection To Claims (Docket No. 9478)

Response Of General Electric Capital Corporation To The Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(c) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, And Lift Stay Procedures Claims Subject To Modification ("Twentieth Omnibus Claim Objection") (Docket No. 9481)

Riverside Claims, LLC's Response To Debtors' Twentieth Omnibus Claims Objection (Docket No. 9484)

Ai-Shreveport, LLC's Objection To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claim, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims And Lift Stay Procedures Claims Subject To Modification (Docket No. 9485)

Android Industries, LLC's Objection To Debtors' Twentieth Omnibus Objection Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate And Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claim, And (E) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced

*Tort Claims And Lift Stay Procedures Claims
Subject To Modification (Docket No. 9486)*

*Deco Automotive, A Division Of Magna
International, Inc.' Objection To Debtors' Twentieth
Omnibus Objection Pursuant To 11 U.S.C. § 502(b)
And Fed. R. Bankr. P. 3007 To Certain (A) Duplicate
And Amended Claims, (B) Insufficiently Documented
Claims, (C) Claims Not Reflected On Debtors' Books
And Records, (D) Untimely Claim, And (E) Claims
Subject To Modification, Tax Claims Subject To
Modification, Modified Claims Asserting
Reclamation, Consensually Modified And Reduced
Tort Claims And Lift Stay Procedures Claims
Subject To Modification (Docket No. 9487)*

*Response Of Victory Packaging L.P. To Debtors'
Twentieth Omnibus Objection To Claims (Docket No.
9531)*

***Response Of The TAI Unsecured Creditors
Liquidating Trust To The Debtors' Twentieth
Omnibus Claims Objection (Docket No. 9559)***

***Response Of Verizon North Inc. To Debtors'
Twentieth Omnibus Claims Objection (Docket No.
9561)***

*Reply Filed: Debtors' Supplemental Reply In Support Of Debtors'
Omnibus Objections Pursuant To 11 U.S.C. § 502(b)
And Fed. R. Bankr. P. 3007 To Certain Untimely
Claims (Docket No. 9543)*

Related Filings: None.

*Status: The hearing will proceed with respect to claims for
which no responses have been filed. The hearing
will be adjourned with respect to all other responses
to future claims hearing dates in accordance with
this Court's Order Pursuant To 11 U.S.C. § 502(b)
And Fed. R. Bankr. P. 2002(m), 3007, 7016, 7026,
9006, 9007, And 9014 Establishing (I) Dates For
Hearings Regarding Objections To Claims And (II)
Certain Notices And Procedures Governing
Objections To Claims, entered December 7, 2006
(Docket No. 6089).*

8. **"Claims Estimation Motion"** – Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9297)

*Responses Filed:*³ *Universal Tool & Engineering Co., Inc.'s Objection To Claims Estimation Motion And Submission Of Counterproposals (Claim Nos. 2174, 2175 And 6878) (Docket No. 9417)*

ARC Automotive, Inc.'s Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9423)

Limited Objection Of Cadence Innovation LLC To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9425)

Objection And Counterproposal Of Lightsource Parent Corporation To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9427)

Statement Of The Official Committee Of Unsecured Creditors In Response To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9442)

Objection And Counterproposal Of Longacre Master Fund Ltd. To Debtors' Proposed Estimation Of Proof Of Claim No. 16395 In Debtors' Motion

³ Responses listed in bold were filed after the September 20, 2007 4:00 p.m. (prevailing Eastern time) objection deadline established under the *Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures* (Docket No. 9297).

For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9451)

Objection And Counterproposal Of Longacre Master Fund Ltd. To Debtors' Proposed Estimation Of Proof Of Claim No. 16395 In Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9452)

Objection Of Texas Instruments Incorporated To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9466)

Objection By Technology Properties, Ltd. To Motion By Debtor For Order Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And Approving Expedited Claims Estimation Procedures (Docket No. 9472)

Objection And Counterproposal Of Comerica Leasing Corporation To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9476)

Limited Objection And Counterproposal Of Claimant Bank Of America, N.A. To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9477)

Kilroy Realty, L.P.'S (I) Response To The Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum

Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures; And (II) Counterproposal For Maximum Capped Amount Of Its Claims (Docket No. 9521)

Johnson Controls, Inc.'s Objection And Counterproposal For Maximum Capped Amount Of Claim No. 15523 (Docket No. 9523)

Johnson Controls, Inc.'s Objection And Counterproposal For Maximum Capped Amount Of Claim No. 15524 (Docket No. 9524)

Johnson Controls, Inc.'s Objection And Counterproposal For Maximum Capped Amount Of Claim No. 15532 (Docket No. 9525)

Response By TK Holdings, Inc. To Motion For Order Pursuant To 11 U.S.C. §§105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9532)

Response By Takata Corporation To Motion For Order Pursuant To 11 U.S.C. §§105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9533)

Response By TK Holdings Inc., Automotive Systems Laboratory, Inc. And Takata Seat Belts Inc. To Motion For Order Pursuant To 11 U.S.C. §§105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures (Docket No. 9534)

Counterproposal Of AIG Member Companies To Debtors' Proposed Maximum Cap On Claims (Docket No. 9560)

Johnson Controls, Inc.'s Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And

502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15525 (Docket No. 9564)

Johnson Controls, Inc.'s Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15526 (Docket No. 9565)

Johnson Controls Battery Group, Inc.'s Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15514 (Docket No. 9566)

Johnson Controls Battery Group, Inc.'s Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15513 (Docket No. 9567)

Johnson Controls Battery Group, Inc.'s Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15515 (Docket No. 9568)

Johnson Controls Technology Company's Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or

Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15520 (Docket No. 9569)

Johnson Controls Technology Company's Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15521 (Docket No. 9570)

Johnson Controls Technology Company's Objection And Reservation Of Rights Relating To Debtors' Motion For Order Pursuant To 11 U.S.C. §§ 105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures With Respect To Claim Number 15519 (Docket No. 9571)

Reply Filed: *An omnibus reply will be filed.*

Related Filings: *Notice Of Withdrawal Of Kilroy Realty, L.P.'s (I) Response To The Debtors' Motion For Order Pursuant To 11 U.S.C. §§105(a) And 502(c) (A) Estimating And Setting Maximum Cap On Certain Contingent Or Unliquidated Claims And (B) Approving Expedited Claims Estimation Procedures; And (II) Counterproposal For Maximum Capped Amount Of Its Claims (Docket No. 9609)*

Status: *The hearing will proceed with respect to (a) claims for which no objections have been filed, (b) claims for which objections have been filed with respect to the Debtors' proposed estimation procedures and which have not been resolved (Technology Properties, Ltd. (Docket No. 9472), Bank of America, N.A. (Docket No. 9477)), and (c) claims for which objections have been filed with respect to the Debtors' proposed estimation procedures and which have been resolved through modification to the proposed Order Pursuant To 11 U.S.C. §§ 105(a) and 502(c) (a) Estimating And Setting Maximum Cap On Certain Contingent And Unliquidated Claims And (b) Approving Expedited Claims*

Estimation Procedures. The hearing with respect to all other claims for which objections have been filed with respect to the Debtors' proposed maximum capped amount will be adjourned to a future claims hearing date. Joint stipulations and agreed orders will be submitted for consideration by the Court with respect to the claims of Orix Warren, LLC, Metaldyne Machining Corporation and Metaldyne Machining And Assembly Company Inc., Robert Bosch LLC f/k/a Robert Bosch Corporation, Kilroy Realty, L.P., ACE American Insurance Company, Pacific Employers Insurance Company, and Illinois Union Insurance Company.

9. **"KECP Third Supplement"** – Third Supplement To KECP Motion (Docket No. 213) Seeking Authority To Continue Short Term At-Risk Performance Payment Program ("AIP") For Second Half Of 2007 (Docket No. 9298)

*Response Filed:*⁴

Objection Of UAW To Debtors' Third Supplement To KECP Motion [Docket No. 9298] Seeking Authority To Continue Annual Incentive Plan For Second Half Of 2007 (Docket No. 9445)

Objection By IUE-CWA To Third Supplemental KECP Motion (Docket No. 9467)

Objections Of USW To Debtors' Third Supplement To KECP Motion Seeking Authority To Continue AIP For Second Half Of 2007 (Docket No. 9490)

Objections Of USW To Debtors' Third Supplement To KECP Motion Seeking Authority To Continue AIP For Second Half Of 2007 (Correction) (Docket No. 9494)

Objections And Memorandum Of Law In Support Of Objections Of IUOE Locals 18s, 101s, 832s And IBEW Local 663, IAM District 10 To Debtors' Third Supplement To KECP Motion Seeking Authority To Continue Annual Incentive Plan For Second Half Of 2007 (Docket No. 9519)

⁴ Responses listed in bold were filed after the September 20, 2007 4:00 p.m. (prevailing eastern time) objection deadline established under the *Third Supplement To KECP Motion (Docket No. 213) Seeking Authority To Continue Short Term At-Risk Performance Payment Program ("AIP") For Second Half Of 2007 (Docket No. 9298)*.

Reply Filed: *An omnibus reply will be filed.*

Related Filings: *Motion For Order Under 11 U.S.C. §§ 105 And 363 Authorizing The Debtors To Implement A Key Employee Compensation Program (Docket No. 213) ("KECP Motion")*

Objection To KECP Motion By Wilmington Trust Company, As Indenture Trustee (Docket No. 1133)

Objection To KECP Motion By USW (Docket No. 1134)

Objection To KECP Motion By UAW (Docket No. 1135)

Objection To KECP Motion By Pension Benefit Guaranty Corporation (Docket No. 1141)

Objection To KECP Motion By IBEW and IAM (Docket No. 1156)

Limited Objection To KECP Motion By Prepetition Agent (Docket No. 1157)

Objection To KECP Motion By IUOE (Docket No. 1159)

Objection To KECP Motion By Securities Class Action Lead Plaintiffs (Docket No. 1161)

Objection To KECP Motion By IUE-CWA (Docket No. 1164)

Objection To KECP Motion By United States Trustee (Docket No. 1288)

Debtors' Omnibus Response To Objections To Their Motion For Order Under 11 U.S.C. §§ 105 And 363 Authorizing The Debtors To Implement A Key Employee Compensation Program (Docket No. 2210)

Order Under 11 U.S.C. §§ 105 And 363 Authorizing The Debtors To Implement A Short-Term Annual Incentive Program (Docket No. 2441)

*Supplement To KECP Motion (Docket No. 213)
Seeking Authority To: (A) Fix Second Half 2006 AIP
Targets And Continue AIP Program And (B) Further
Adjourn KECP Emergence Incentive Program
Hearing (Docket No. 4419)*

*Objection To Supplement By IUE-CWA (Docket No.
4524)*

*Objection To Supplement By USW (Docket No.
4526)*

*Response To Supplement By Securities Class Action
Lead Plaintiffs (Docket No. 4528)*

*Objection To Supplement By IBEW, IAM, and IUOE
(Docket Nos. 4529-4531)*

*Objection To Supplement By UAW (Docket No.
4556)*

*Debtors Omnibus Response To Objections To
Supplement To KECP Motion (Docket No. 213)
Seeking Authority To: (A) Fix Second Half 2006 AIP
Targets And Continue AIP Programs And (B)
Further Adjourn KECP Emergence Incentive
Program Hearing (Docket No. 4586)*

*Order Under 11 U.S.C. §§ 105 And 363 Authorizing
The Debtors To: (A) Fix Second Half 2006 AIP
Targets And Continue AIP Program And (B) Further
Adjourn KECP Emergence Incentive Program
Hearing (Docket No. 4660)*

*Second Supplement To KECP Motion (Docket No.
213) Seeking Authority To Continue AIP For First
Half Of 2007 (Docket No. 7200)*

*Objections And Memorandum Of Law In Support Of
Objections Of IBEW Local 663, IAM District 10 And
IUOE Locals 18S And 832S To Second Supplement
To KECP Motion Seeking Authority To Continue
AIP For First Half Of 2007 (Docket No. 7324)*

*Objection Of UAW To Debtors' Second Supplement
To KECP Motion [Docket No. 7200] Seeking
Authority To Continue AIP For First Half Of 2007
(Docket No. 7325)*

Objections Of USW To Debtors' Second Supplement To KECP Motion Seeking Authority To Continue AIP For First Half Of 2007 (Docket No. 7327)

Objection By IUE-CWA To Second Supplemental KECP Motion (Docket No. 7335)

Second Supplemental Order Under 11 U.S.C. §§ 105 And 363 Authorizing The Debtors To Continue AIP For First Half 2007 (Docket No. 7474)

Status: The hearing with respect to this matter will be proceeding.

10. **"Saginaw Chassis Asset Sale Motion"** – Expedited Motion For Orders Under 11 U.S.C. § 363 And Fed. R. Bankr. P. 2002, 6004, And 9014 (A) (I) Approving Bidding Procedures, (II) Granting Certain Bid Protections, (III) Approving Form And Manner Of Sale Notices, And (IV) Setting Sale Hearing Date And (B) Authorizing And Approving Sale By Delphi Automotive Systems LLC And Delphi Technologies, Inc. Of Certain Equipment And Other Assets Primarily Used In Debtors' Saginaw Chassis Business Free And Clear Of Liens (Docket No. 9368)

Response filed: Limited Objection Of International Union, UAW To Expedited Motion For Orders (A) (I) Approving Bidding Procedures, (II) Granting Certain Bid Protections, (III) Approving Form And Manner Of Sale Notices, And (IV) Setting Sale Hearing Date And (B) Authorizing And Approving Sale Of Certain Equipment And Other Assets Primarily Used In Debtors' Saginaw Chassis Business Free And Clear Of Liens (Docket No. 9584)

Reply filed: A reply will be filed.

Related filings: None.

Status: The hearing with respect to this matter will be proceeding.

Dated: New York, New York
September 26, 2007

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