

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: GENERAL MOTORS CORP.  
DERIVATIVE LITIGATION

MDL No. 06-1749  
Master Case No. 06-md-1749  
Hon. Gerald E. Rosen  
ALL DERIVATIVE CASES  
Case Nos. 05-74334  
05-74769  
05-74770

**TO: ALL CURRENT HOLDERS OF GENERAL MOTORS CORPORATION  
("GM") COMMON STOCK**

YOU ARE HEREBY NOTIFIED that the parties to the above-captioned derivative actions (the "Federal Derivative Actions") and the state court derivative actions filed in Wayne County, Michigan (*Bouth v. Barnevik et. al.*, 05-534616-CZ; and *Salisbury v. Barnevik et al.*, 05-535858-CZ.) (the "State Derivative Actions") (the "Derivative Actions") have entered into a Stipulation and Agreement of Settlement (the "Stipulation") to resolve the issues raised by the Derivative Actions (the "Settlement").

PLEASE BE FURTHER ADVISED that pursuant to an Order of the United States District Court for the Eastern District of Michigan, a hearing will be held on December 22, 2008, at 10:00 a.m., before the Honorable Gerald E. Rosen, at The Theodore Levin United States Courthouse, 231 W. Lafayette Blvd., Detroit, Michigan 48226, for the purpose of determining: (a) whether the Settlement of the Derivative Actions by way of the adoption of certain corporate governance provisions (as set forth in more detail in the Stipulation on file with the Court) should be approved by the Court as

fair, reasonable and adequate to GM and its common stockholders; (b) whether the Derivative Actions should be dismissed with prejudice; and (c) whether the application of Derivative Plaintiffs' Counsel for attorneys' fees and expenses should be approved.

If you were a shareholder of GM common stock as of September 17, 2008, your rights to pursue certain derivative claims on behalf of GM may be affected by this Settlement.

If you would like any additional information regarding the Derivative Actions or the settlement, including information regarding the requirements for filing objections to the Settlement, you may contact the following Federal Derivative Plaintiffs' Counsel: GM Derivative Litigation, c/o David H. Fink, Esq., The Miller Law Firm, P.C., 950 W. University Drive, Ste. 300, Rochester, Michigan 48307.

The pleadings and other records of the Federal Derivative Actions as well as the Stipulation filed with the Court may be examined and copied at any time during regular office hours of the United States District Court for the Eastern District of Michigan at The Theodore Levin United States Courthouse, 231 W. Lafayette Blvd., Detroit, Michigan 48226. The Stipulation can also be viewed on the websites of Federal Derivative Plaintiffs' Counsel at [www.millerlawpc.com](http://www.millerlawpc.com) and [www.whafh.com](http://www.whafh.com), as well as GM's website at [www.gm.com](http://www.gm.com).

Any objection to the Settlement must be filed with the Court and served on each of the following (either by hand delivery or first class mail) no later than December 8, 2008:

Clerk of the Court  
UNITED STATES DISTRICT COURT  
Eastern District of Michigan  
231 W. Lafayette Blvd  
Detroit, MI 48226

David H. Fink  
THE MILLER LAW FIRM, P.C.  
950 W. University Drive, Suite 300  
Rochester, Michigan 48307  
Telephone: (248) 841-2200  
Facsimile: (248) 652-2852

David L. Wales  
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP  
270 Madison Avenue  
New York, New York 10016  
Telephone: (212) 545-4600  
Facsimile: (212) 545-4653

**Co-Lead Counsel for the Federal Derivative Plaintiffs**

Robert J. Kopecky  
KIRKLAND & ELLIS, LLP  
200 East Randolph Drive  
Chicago, IL 60601

**Counsel for G. Richard Wagoner and Nominal Defendant General Motors Corporation**

Stephen A. Radin  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, NY 10153

**Counsel for Defendants Erskine B. Bowles, John M. Devine, Kent Kresa, Philip A. Laskawy, Percy N. Barnevik, John H. Bryan, Armando M. Codina, George M. C. Fisher, Karen L. Katen, Ellen J. Kullman, E. Stanley O'Neal, and Eckhard Pfeiffer**

**PLEASE DO NOT TELEPHONE THE COURT OR GM REGARDING THIS NOTICE.**

IT IS SO ORDERED.

DATED: September 23, 2008

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN