

BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

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IN RE:)
)
General Motors Automotive-North America) Docket No. RCRA-05-2004-0001
)

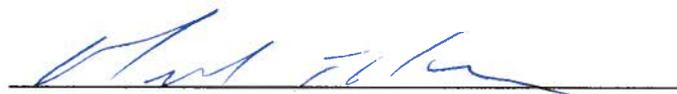
MOTION TO WITHDRAW

Come now the former attorneys for Respondent in the above-captioned matter, John M. Kyle III, Esq., and Michael T. Scanlon, Esq., of the law firm BARNES & THORNBURG LLP, and respectfully request to withdraw their Appearances on behalf of General Motors Corporation ("GM") in the above-captioned matter.

Prior to submitting this Motion to Withdraw, Mr. Kyle and Mr. Scanlon have worked with GM's in-house counsel, James P. Walle, Esq., to ensure a smooth transition in this matter. In addition, Mr. Walle is intimately familiar with this matter and has participated in at least two conference calls with the Honorable Barbara A. Gunning and counsel for the United States Environmental Protection Agency concerning the remand of this matter by the Environmental Appeals Board [captioned RCRA (3008) Appeal No. 06-02 before the Environmental Appeal Board]. GM is aware of and consents to the filing of this Motion.

Therefore, Mr. Kyle and Mr. Scanlon of the law firm BARNES & THORNBURG LLP respectfully request that the Environmental Appeals Board enter an Order granting this Motion to Withdraw.

Respectfully submitted,



Michael T. Scanlon, Esq.
Barnes & Thornburg LLP
11 South Meridian Street
Indianapolis, Indiana 46204

Former Counsel for General Motors Corporation

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CERTIFICATE OF SERVICE

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I hereby certify that on 5th day of January, 2009, service of a true and complete copy of the Motion to Withdraw for John M. Kyle III, Esq. and Michael T. Scanlon, Esq. of the law firm BARNES & THORNBURG LLP was made upon each party or attorney of record herein by first class mail, postage prepaid, addressed to:

James P. Walle, Esq.
General Motors Legal Staff
Mail Code 482-C24-D24
300 Renaissance Center
Detroit, Michigan 48243

Robert J. Martineau, Jr. Esq.
Edward M. Callaway, Esq.
Michelle B. Walker, Esq.
Waller Lansden Dortch & Davis, LLP
511 Union Street, Ste. 2700
Nashville, Tennessee 37219-8966

Mary Leaves, Esq.
Office of General Counsel
U.S. EPA
1200 Pennsylvania Ave., N.W.
Ariel Rios Building, Room No. 7313H
Washington, DC 20460

Christine McCulloch, Esq.
Office of Civil Enforcement
U.S. EPA
1200 Pennsylvania Ave., N.W.
Ariel Rios Building, Room No. 4153B
Washington, DC 20460

Karen L. Peaceman, Esq.
James J. Cha, Esq.
Richard Clarizio, Esq.
Associate Regional Counsel
Office of Regional Counsel
U.S. EPA, Region V
77 West Jackson Boulevard
Mail Code C-14J
Chicago, Illinois 60604-3590

Honorable Barbara A. Gunning
Administrative Law Judge
U.S. EPA, Office of Administrative
Law Judge
Franklin Court, Suite 350
1099 14th Street NW

Sonja Brooks-Woodard
Regional Hearing Clerk
U.S. EPA, Region V
77 West Jackson Boulevard, 13th Floor
Mail Code E-13J
Chicago, Illinois 60604-3590

U.S. Environmental Protection Agency
Clerk of the Board, Environmental Appeals
Board (MC 1103B)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001


Michael T. Scanlon