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July 1, 2014

VIA HAND DELIVERY AND ECF FILING

The Honorable Robert E. Gerber
United States Bankruptcy Court for the Southern District of New York
Alexander Hamilton Custom House
Southern District of New York
One Bowling Green
New York, NY 10004-1415

RE: In re Motors Liquidation Co., et al.
Case No. 09-50026 (REG)

Dear Judge Gerber:

This firm serves as co-counsel, along with the firms of Kozyak Tropin & Throckmorton, P.A., Podhurst Orseck, P.A., and their co-counsels listed on Schedule A who represent one hundred and thirty-five plaintiffs in thirty-three states, including the plaintiffs in actions styled *Santiago v. General Motors, LLC* (Case No. 14-CV-21147), *Espineira v. General Motors, LLC and Delphi Automotive, PLC* (Case No. 14-CV-21417), and *DeSutter et al. v. GM LLC*, (Case No. 14-CV-80497), which are pending in the United States District Court for the Southern District of Florida action against General Motors, LLC (“**New GM**”) for violation of the Racketeering Influenced and Corrupt Organizations Act (“**RICO**”) and other statutory and common law claims arising from its participation in the sale of GM cars with defective ignition switches and the concealment of this dangerous defect.

In accordance with this Court’s endorsed order dated April 22, 2014 [Dkt. No. 12627], a group of class action/plaintiffs’ attorneys and bankruptcy attorneys representing numerous plaintiffs met and selected “Designated Counsel” and myself as Liaison Counsel. More specifically, a sub-group of bankruptcy attorneys from Brown Rudnick, Stutzman Bromberg and Caplin Drysdale (collectively, the “Designated Counsel”) was selected to make the presentation on behalf of ignition switch claimants at the May 2 status conference hearing and, upon entry of the Court’s May 16, 2014 scheduling order (the “Scheduling Order”) [Dkt. No. 12697], to engage in the negotiation and submission of proposed Stipulations of Fact with New GM.

The consensus of the group that selected the Designated Counsel was that they also wished me to serve as Liaison Counsel to consult and work with the Designated Counsel and other plaintiff bankruptcy and non-bankruptcy counsel, in connection with the matters before the Court. Since then, I, and partners of my firm, have been actively involved as Liaison Counsel regarding the preparation by the parties of the Stipulations of Fact. As part of that task, we have



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performed, among other services, the services mandated by the second to last decretal paragraph of the Scheduling Order, including, for example, that we have communicated with, informed and liaised with the Designated Counsel and other bankruptcy counsel who have filed a notice of appearance and their co-plaintiff counsel regarding the matters set forth in the Scheduling Order.

I will be prepared to address the Court as may be needed at the July 2, 2014 status conference with respect to my role and activities as Liaison Counsel on behalf of the involved parties and, more generally, on any matters before the Court for which my input is sought.

Respectfully submitted,

/s/ Melanie L. Cyganowski

Melanie L. Cyganowski

cc: Arthur Steinberg, Esq. (via email)
Edward S. Weisfelner, Esq. (via email)
Jonathan L. Flaxer, Esq. (via email)
Elihu Inselbuch, Esq. (via email)
Sander L. Esserman, Esq. (via email)
Lisa H. Rubin, Esq. (via email)
David H. Golden, Esq. (via email)



SCHEDULE A

- Higer Lichter & Givner LLP
- Whatley Kallas LLP;
- Wiggins, Childs, Quinn & Pantazis, LLC;
- Harke Clasby & Bushman LLP;
- Archie Lamb & Associates, LLC;
- Freidin Dobrinsky;
- Merlin Law Group, P.A.;
- Hiden, Rott & Oertle, LLP;
- Fuerst Ittleman David & Joseph, PL;
- Rivero Mestre LLP; and
- Gray & White
- Searcy Denny Scarola Barnhart & Shipley