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Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

*Attorneys for General Motors LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
-----X		

**NOTICE OF FILING OF FOURTEENTH SUPPLEMENT TO  
SCHEDULE "1" TO THE MOTION OF GENERAL MOTORS LLC  
PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE  
COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION**

**PLEASE TAKE NOTICE** that on December 24, 2014, General Motors LLC filed the attached *Fourteenth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York  
December 24, 2014

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

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*Attorneys for General Motors LLC*

**FOURTEENTH SUPPLEMENT<sup>1</sup> TO SCHEDULE “1”**  
**CHART OF ADDITIONAL IGNITION SWITCH ACTIONS**  
**COMMENCED AGAINST NEW GM NOT LISTED IN THE**  
**PREVIOUS SUPPLEMENTS TO SCHEDULE “1” TO MOTION TO ENFORCE**

	<u>Name</u>	<u>Class Models</u>	<u>Plaintiffs’ Model</u>	<u>Court</u>	<u>Filing Date</u>
1	Powell <sup>2</sup>	N/A	2006 Chevy Cobalt 2008 Chevy Cobalt	Superior City Court Caddo Parish, Louisiana 2014RD8350 <sup>3</sup>	11/10/14

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<sup>1</sup> This schedule supplements the previous supplements and the original Schedule “1” previously filed with the Court in connection with the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (“Motion to Enforce”)*.

<sup>2</sup> A copy of the complaint filed in the Powell Action is attached hereto as Exhibit “A.”

<sup>3</sup> The Powell Action was removed by New GM to the United States District Court for the Western District of Louisiana (No.: 5:14-cv-3488) on December 19, 2014.

# **Exhibit A**



CORPORATION SERVICE COMPANY®

## Notice of Service of Process

null / ALL  
Transmittal Number: 13247786  
Date Processed: 12/09/2014

**Primary Contact:** Rosemarie Williams  
General Motors LLC  
Mail Code 48482-038-210  
400 Renaissance Center  
Detroit, MI 48265

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**Entity:** General Motors LLC  
Entity ID Number 3113523

**Entity Served:** General Motors L.L.C.

**Title of Action:** Powell, Gerald vs. General Motors LLC

**Document(s) Type:** Citation/Petition

**Nature of Action:** Contract

**Court/Agency:** Shreveport City Court, Louisiana

**Case/Reference No:** 2014R08350

**Jurisdiction Served:** Louisiana

**Date Served on CSC:** 12/09/2014

**Answer or Appearance Due:** 10 Days

**Originally Served On:** CSC

**How Served:** Personal Service

**Sender Information:** Mary T. Amari (Shreveport, LA)  
318-424-0200

**Client Requested Information:** Year: 2006  
Make: Chevrolet  
Model: Cobalt  
VIN:

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**Notes:** Mary T. Amari 628 Stoner Avenue Shreveport, Louisiana 71101  
CSC Location document was served: Corporation Service Company 320 Somerulos Street Baton Rouge, LA 70802-6129

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**  
*CSC is SAS70 Type II certified for its Litigation Management System.*  
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

Plaintiff: GERALD POWELL, D/B/A BEE SAFE DRIVING  
SCHOOL INC.  
vs  
Defendant: GENERAL MOTORS L.L.C.

Case Number: 2014R08350  
City Court  
Fourth Ward, Shreveport,  
Caddo Parish, Louisiana  
Civil Clerks Office  
1244 Texas Avenue

### CITATION

TO: GENERAL MOTORS L.L.C.  
Through Agent of Record  
CORPORATION SERVICES COMPANY  
320 SOMERULOS ST.  
BATON ROUGE, LA 70802

You are hereby notified that **YOU HAVE BEEN SUED** in this Court by the above named plaintiff(s), per the attached copy of the petition which has been filed.

You are hereby cited either to comply with the demand contained in the petition, a certified copy of which is annexed hereto, or make an appearance either by filing an answer or other pleading in the office of the Clerk of Court of Shreveport in the City Court Building at 1244 Texas Ave. in the City of Shreveport, Caddo Parish, within **TEN (10)** calendar days.

**Do not fail to respond, under penalty of default.**

Witness the Honorable Sheva M. Sims, Judge of the City Court of Shreveport, Louisiana, on this 12th day of November, 2014.

*Robert H Shemwell*

Requested By: Plaintiff

Robert Shemwell  
Clerk of Court

#### SERVICE INFORMATION

Received the within \_\_\_\_\_ on the date of \_\_\_\_\_ and on the date of \_\_\_\_\_, at \_\_\_\_\_, I served the same on the within named \_\_\_\_\_ at his/her residence in jurisdiction of my office, by handing a certified copy hereof together with a certified copy of the above described pleading to \_\_\_\_\_, who upon inquiry learned \_\_\_\_\_ name to be \_\_\_\_\_ a person of suitable age and discretion, residing at the dwelling house or usual place of abode of the said \_\_\_\_\_, as a member of his domiciliary establishment.

Deputy City Marshal  
Fourth Ward, Caddo Parish, Louisiana

Received the within Citation on the date \_\_\_\_\_ and on the date \_\_\_\_\_ at \_\_\_\_\_, served same by handing a true copy to \_\_\_\_\_ the Defendant in person \_\_\_\_\_

Unable to Serve     Jurisdiction Transfer



Deputy City Marshal  
Fourth Ward, Caddo Parish, Louisiana

FILED

Pg 4 of 8

11-10-14

S/

AW

DEPUTY CLERK

A TRUE COPY: ATTEST

BY: Carmen Brown  
DEPUTY CLERK CITY COURT

GERALD POWELL D/B/A  
BEE SAFE DRIVING SCHOOL INC.

DOCKET NO:            SECTION:             
2014R08350

VERSUS

SHREVEPORT CITY COURT

GENERAL MOTORS L.L.C.

CADDO PARISH, LOUISIANA

PETITION FOR DAMAGES

NOW INTO COURT through undersigned counsel comes plaintiff, GERALD POWELL (hereafter referred to as "POWELL") a person of full age of majority, domiciled in Parish of Caddo, State of Louisiana, who respectively represents the following Petition for Damages to wit:

1.

Made defendant herein is:

GENERAL MOTORS L.L.C. (hereafter referred to as "GM"), who can be served as set forth herein:

2.

The above named defendant is indebted to plaintiff, in solido, for the following non-exclusive, cause of the damages sustained by plaintiffs:

3.

GM is a foreign limited liability company, with its registered office located in Delaware, its primary place of business located in Michigan, and that is authorized to do and is doing business in Louisiana.

4.

POWELL is owner and operator of Bee Safe Driving School.

5.

POWELL purchased two vehicles for Bee Safe Driving School. A 2006 Chevrolet Cobalt and a 2008 Chevrolet Cobalt.

6.

Both vehicles were equipped with dual-side brakes (brake pedal on both driver and passenger side) so that the instructor can assist the student driver as they learn to drive.

7.

As owner/operator of Bee Safe Driving School, **POWELL** is responsible for the safety of the students that drive the vehicles.

8.

On or about February 2014, **GM** began implementing Recall No. 14V-047.

9.

The recall is to replace the ignition switch in certain model and model year vehicles.

10.

This recall included both the 2006 and 2008 Chevrolet Cobalt's owned by **POWELL**.

11.

The recall notice states "there is a risk, under certain conditions that your ignition switch may move out of the "run" position, resulting in a partial loss of electrical power and turning off the engine."

12.

Because the replacement parts would not arrive for 6 weeks. **POWELL** parked both of the vehicles due to their unsafe driving condition.

13.

**GM** offered **POWELL** a rental car to use in during this time but the rental was not sufficient due to the lack of the dual side braking system, which is necessary for **POWELL'S** use of the vehicle.



14.

The resulting parking of the properly equipped vehicles resulted in a loss of more than \$21,000 to **POWELL** because of his inability to use the vehicles in a safe manner.

15.

As a result of the aforementioned acts **POWELL** has suffered damage to his business operations, emotional distress, legal fees and costs resulting from the recall, which **GM** issued and directly affected **POWELL** and his business.

16.

Petitioner shows that the amount in controversy is under \$35,000.

17.

**WHEREFORE PLAINTIFF PRAYS** that the defendant be served with a copy of this petition, and after all legal delays and due proceedings had, there be judgment in favor of the plaintiff, **GERALD POWELL**, and against the defendants, **GENERAL MOTORS** for compensatory damages in an amount that will fully and adequately satisfy the demands of justice and equity, together with legal interest thereon from the date of judicial demand, until paid, and for all cost of these proceedings. Further wherefore **PLAINTIFF** prays for all general and equitable relief to which he may be entitled.

Respectfully Submitted:

By: 

Ronald J. Miciotto  
La Bar Roll No. 07540  
Mary T. Amari  
La. Bar Roll No. 34419  
628 Stoner Avenue  
Shreveport, Louisiana 71101  
318-424-0200 Telephone  
318-424-3730 Facsimile  
**Attorney for Gerald Powell**

**SERVICE ON NEXT PAGE**

**Please Serve:**

General Motors LLC  
Through its agent for service of process:  
Corporation Services Company  
320 Somerulos St.  
Baton Rouge, La. 70802

GERALD POWELL D/B/A  
BEE SAFE DRIVING SCHOOL INC.

DOCKET NO: \_\_ SECTION: \_\_  
2014RD8350

VERSUS

SHREVEPORT CITY COURT

GENERAL MOTORS L.L.C.

CADDO PARISH, LOUISIANA

AFFIDAVIT OF VERIFICATION

STATE OF LOUISIANA

PARISH OF CADDO

BEFORE ME, the undersigned Notary Public, personally came and appeared, GERALD POWELL, who after being duly sworn did depose and state:

That he is the petitioner in the foregoing petition for Damages; that he has read all of the allegations contained therein and that said allegations are true and correct to the best of his knowledge, information and belief.

  
GERALD POWELL

SWORN AND SUBSCRIBED before me, Notary, on this, the 4th day of November 2014.

  
NOTARY PUBLIC

Elisabeth J. Caldwell  
My Commission Is For Life  
#60488