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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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

NO STAY PLEADING

On June 1, 2015, this Court issued its Judgment related to the Court’s Decision on Motion to Enforce Sale Order entered on April 15, 2015 (the “Judgment”). Doc. # 13177. Paragraph 10(a) of the Judgment states that certain cases listed on Exhibit B of the Judgment are stayed. *Id.* at 4. Included on the list of impacted cases on Exhibit B of the Judgment is the case of *Hailes, et al. v. General Motors LLC, et al.*, No. 15PU-CV00412 filed in Pulaski County, Missouri. Counsel who represented the plaintiffs in *Hailes* have notified Co-Lead Counsel in the MDL that the action was voluntarily dismissed on May 19, 2015, prior to entry of the Judgment. A file stamped copy of the dismissal is attached as Exhibit A. Counsel who filed the *Hailes* matter have contacted counsel for General Motors, who acknowledge the dismissal was filed prior to the Judgment. To avoid confusion, counsel who previously represented the plaintiffs in *Hailes* request that the Judgment be amended to remove reference to the previously dismissed *Hailes* case or that a no stay order be issued regarding the dismissed *Hailes* action.

Dated: June 24, 2015

Respectfully submitted,

/s/ Steve W. Berman

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On behalf of:

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*Filing Counsel in Hailes et al. v. General Motors
LLC, et al., No. 15PU-CV00412 (Pulaski County,
MO)*

CERTIFICATE OF SERVICE

The undersigned certifies that on June 24, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all parties of record.

Dated: June 24, 2015

/s/ Steve W. Berman _____
Steve W. Berman (*pro hac vice*)
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Exhibit A

IN THE CIRCUIT COURT OF PULASKI COUNTY
TWENTY-FIFTH JUDICIAL CIRCUIT
STATE OF MISSOURI

JOHNETTE HAILES and
AILEEN HARRIS

Plaintiffs,

v.

GENERAL MOTORS LLC and
GENERAL MOTORS COMPANY,

Defendants.

Civil Case No. 15PU-CV-00412

FILED

MAY 19 2015

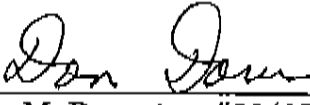
RACHELLE BEASLEY
CIRCUIT CLERK & EX. OFFICIO
RECORDER OF DEEDS
PULASKI COUNTY, MO

DISMISSAL WITHOUT PREJUDICE

COME NOW Plaintiffs, by and through their undersigned attorneys, and pursuant to Rule 67.02(a) of the Missouri Rules of Civil Procedure, hereby dismiss this action without prejudice.

Respectfully submitted,

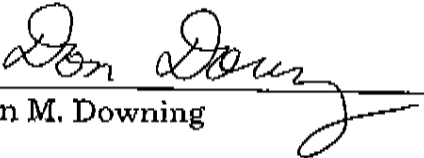
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the parties by U.S. mail, first-class, postage prepaid, on this 12th day of May, 2015.

CSC of St. Louis County, Inc.
130 South Bemiston Avenue, Suite 700
Clayton, MO 63105



Don M. Downing