

**Hearing Date and Time:  
To be Determined by Court if Necessary**

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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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	

**RESPONSE BY GENERAL MOTORS LLC TO NO  
STAY PLEADING FILED BY THE HAILES PLAINTIFFS**

1. General Motors LLC ("**New GM**") is in receipt of the *No Stay Pleading* filed by the plaintiffs in the lawsuit captioned *Hailes, et al. v. General Motors LLC, et al.*, No 15PU-CV-00412, filed in Pulaski County, Missouri ("**Hailes Lawsuit**"). Prior to the filing of the No Stay Pleading, counsel in the Hailes Lawsuit contacted counsel for New GM to state that the Hailes Lawsuit was previously dismissed without prejudice, and therefore should not have been included in Exhibit "B" to the Judgment of this Court, dated June 1, 2015 [Dkt. No. 13177]

(“**Judgment**”). New GM confirmed that was the case, and counsel for Hailes then stated he would advise New GM if further action was required. Thereafter, counsel for Hailes filed the No Stay Pleading, indicating that the Hailes Lawsuit had been previously dismissed without prejudice.

2. In view of the foregoing, New GM has no objection to the Court entering an order finding that the Hailes Lawsuit was dismissed without prejudice by the Hailes Plaintiffs on May 19, 2015, and that it be stricken from Exhibit “B” to the Judgment.

Dated: New York, New York  
July 6, 2015

Respectfully submitted,

/s/ Arthur Steinberg  
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