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## VIA E-MAIL TRANSMISSION AND ECF FILING

September 13, 2015

AND ECF FILING The Honorable Robert E. Gerber United States Bankruptcy Judge United States Bankruptcy Court Southern District of New York Alexander Hamilton Custom House One Bowling Green New York, New York 10004-1408 gerber.chambers@nysb.uscourts.gov

## Re: In re Motors Liquidation Company, et al., Case No. 09-50026 (REG); Sesay et al v. General Motors et al, 1:14-06018 (JMF); Elliott, et al. v.. General Motors LLC, et al., 1:14-cv-8382 (JMF); Bledsoe et al. v. General Motors LLC, 1:14-cv-7631-(JMF) – Punitive Damages Issues

Your Honor:

I represent Celestine Elliott, Lawrence Elliott, Berenice Summerville, Ishmail Sesay, Joanne Yearwood, Sharon Bledsoe, Tina Farmer, Paul Fordham, Momoh Kanu, Tynesia Mitchell, Dierra Thomas and James Tibbs, plaintiffs in the above captioned actions. Ms. Farmer and Mr. Kanu are post-Sale accident victims.

I write on their behalf to notify the Court that Ms. Farmer and Mr. Kanu join in and adopt as their own the positions set forth in the Post-Closing Ignition Switch Accident Plaintiffs' Memorandum of Law with Respect to Punitive Damages Issue, and that each of the *Elliott, Sesay*, and *Bledsoe* Plaintiffs join in and adopt as their own the positions set forth in the Joinder of the Ignition Switch and Non-Ignition Switch Plaintiffs to the Post-Closing Ignition Switch Accident Plaintiffs' Memorandum of Law With Respect To Punitive Damages Issue. The *Elliott, Sesay*, and *Bledsoe* Plaintiffs also join in any additional responsive papers and oral argument presented by Designated Counsel on the punitive damages issue and do not seek to be heard independently on the punitive damages issue.

Please feel free to contact me if you have any questions.

Respectfully submitted, /s/ *Gary Peller* Gary Peller

cc: Arthur Steinberg, Esq.