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September 1, 2016

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
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

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (MG)**

Further Update on Meet and Confer Process on Bankruptcy Issues

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. On August 9, 2016 (“**August 9 Letter**”), New GM provided the Court with an update on the meet and confer process to determine the most appropriate procedures to address the range of issues relative to enforcement of the 2009 Sale Order in the above referenced case, given the Second Circuit’s July 13, 2016 Opinion (“**Opinion**”).¹ After discussing the matter with Designated Counsel, and as set forth in the August 9 Letter, New GM and Designated Counsel stated that they would provide a further update to the Court on the meet and confer process on September 1, 2016.

As an update, at the time the August 9 Letter was filed with the Court, New GM believed there was time to meet with all parties to determine a complete list of issues that the Bankruptcy Court would need to address as a result of the Opinion. However, in MDL 2543, the *Norville*

¹ New GM filed its *Petition for Panel Rehearing and Rehearing En Banc* (“**Rehearing Petition**”) with the Second Circuit on August 10, 2016. Amicus curie briefs were filed by the National Association of Manufacturers and the Chambers of Commerce of the United States of America in support of New GM’s Rehearing Petition. The Second Circuit has not yet ruled on the Rehearing petition. Upon filing the Rehearing Petition, the Mandate was stayed pending a ruling by the Second Circuit.

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plaintiff (who is the subject of the bellwether trial scheduled to commence in November 2016) amended her complaint on August 12, 2016, raising successor liability issues which New GM believes are properly addressed by this Court. Accordingly, by letter dated August 19, 2016, New GM requested that this Court schedule a status conference to discuss the successor liability issue and to establish appropriate expedited procedures for resolving same so that it does not interfere with the *Norville* trial date. Designated Counsel and Lead Counsel objected to the requested status conference. As of the date of this letter, the Court has not yet scheduled a status conference to discuss the successor liability issue or appropriate procedures for resolving same. It should be noted that in MDL 2543, the *Norville* plaintiff filed a summary judgment motion on the successor liability issue on August 23, 2016, and New GM filed its response today, September 1, 2016.²

In addition to the foregoing, New GM prepared a letter to be sent to various parties in interest establishing proposed procedures designed to identify issues the Court may need to address in light of the Opinion, and to establish procedures for the Court to resolve same. New GM provided drafts of this letter to Designated Counsel, who reviewed and provided comments. The letter was then circulated on August 26, 2016 (“**August 26 Letter**”)³ to (i) Lead Counsel in MDL 2543 and its retained Designated Counsel in the bankruptcy proceedings, (ii) plaintiffs who are the subject of pending New GM motions to enforce the Sale Order, and (iii) the GUC Trust and GUC Trust Unitholders (collectively, the “**Initial Group**”). The Initial Group was selected because New GM and Designated Counsel believed that it would be unwieldy and inefficient to seek input from a wider group as an initial step with respect to the development of an issues list and suggested procedures for resolution. The Initial Group and New GM will work to see if a consensus can be reached, and then broaden the dialogue with other interested parties.

Parties in the Initial Group have until September 2, 2016 to state whether (i) they believe other interested parties should be included in the initial steps in this process, and/or (ii) they have any objection to the procedures set forth in the August 26 Letter. By September 7, 2016, the parties are to exchange their list of issues that they believe this Court should resolve, and the procedures that should be adopted to resolve same. Meet and confers will then be scheduled, with the goal of providing the Court, within three (3) business days prior to any status conference scheduled by the Court for October 2016 (or such other time as the Court directs), with an agreed-upon final issues list (with proposed procedures), or, if a consensus cannot be reached, (i) a list of all agreed-upon issues and/or any agreed-upon procedures, and (ii) the additional issues and/or procedures the parties could not reach consensus on.

This update letter has been reviewed and approved by Brown Rudnick, as counsel for the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs.

If the Court has any questions or needs additional information, please let us know.

² If the Court would like copies of the summary judgment papers filed with the District Court, New GM will provide them.

³ A copy of the August 26 Letter is attached hereto as **Exhibit “A.”**

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Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

Reviewed and Agreed to by:

/s/ Edward S. Weisfelner
Edward S. Weisfelner
Brown Rudnick LLP
*Designated Counsel for Ignition Switch
Plaintiffs and certain Non-Ignition Switch
Plaintiffs in the Bankruptcy Court*

AJS/sd

cc: Initial Group Set Forth On Schedule "1" Annexed Hereto.

SCHEDULE 1

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Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt No. 13634]

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Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt No. 13655]

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Parties Subject to the Pilgrim Motion to Enforce

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Exhibit A

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August 26, 2016

**Re: In re Motors Liquidation Company (f/k/a General
Motors Corporation), et al.
Case No. 09-50026 (MG)**

**Procedures for Identification of Issues
For Resolution by the Bankruptcy Court**

TO THE PARTIES LISTED ON EXHIBIT "1" ATTACHED HERETO:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for New GM in the *Old GM* bankruptcy case pending in the Bankruptcy Court for the Southern District of New York ("**Bankruptcy Court**"). At a Status Conference held on July 18, 2016, Bankruptcy Judge Glenn directed all parties-in-interest to meet and confer to identify and determine the most appropriate procedures to address all issues that the Bankruptcy Court still needs to decide in view of (a) the Bankruptcy Court's 2009 Order ("**Sale Order**") approving the sale of certain assets from Old GM to New GM, (b) other matters arising from the *Old GM* bankruptcy case, and (c) the Second Circuit Court of Appeals' July 13, 2016 Opinion relating to the Sale Order.

As you know, there are many plaintiffs ("**All Plaintiffs**") who have filed lawsuits against New GM that involve Old GM vehicles. New GM believes it would be unwieldy and inefficient to seek input from All Plaintiffs and other interested parties as an initial step with respect to the development of an issues list and suggested procedures for resolution. Rather, it makes sense to start with a smaller, core group of parties-in-interest, to see whether a consensus can be reached, and then broaden the dialogue with the All Plaintiffs group. At a minimum, the core group should consist of New GM's counsel plus (i) Lead Counsel in MDL 2543 and its retained Designated Counsel in the bankruptcy proceedings, who represent Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs, (ii) plaintiffs who are the subject of pending New GM motions to enforce the Sale Order, and (iii) the GUC Trust and GUC Trust Unitholders (collectively, the "**Initial Group**"). This core group (New GM and the Initial Group) is referred to as the "**Initial Parties-in-Interest**."¹

¹ A list of the Initial Parties-in-Interest, and their e-mail addresses (where applicable) are attached hereto as Exhibit "1."

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New GM proposes the following procedures:

1. If any Initial Party-in-Interest (i) believes that other interested parties should be included in these initial steps, or (ii) has any objection to the procedures set forth herein, they are to identify that additional interested party (or parties) and/or voice their objection by **no later than September 2, 2016 at 5:00 p.m.** by e-mail transmission to all of the other Initial Parties-in-Interest.
2. The Initial Parties-in-Interest (and any party or parties who are added pursuant to paragraph 1 above) are to exchange by e-mail transmission on **September 7, 2016 at 5:00 p.m. (Eastern)** their list of issues ("**Initial Issues Lists**") that they believe the Bankruptcy Court should resolve, and the procedures that should be adopted to resolve such issues.
3. Within three (3) business days of the exchange of Initial Issues Lists, the Initial Parties-in-Interest will each participate in a telephonic "meet and confer" to discuss (a) the issues identified in the Initial Issues Lists and whether they should be included in a master list of the issues ("**Master List of Issues**"), and (b) the procedures that should be adopted to resolve the Master List of Issues. The purpose of the meet and confer (and any subsequent meet and confer) will be to work towards a consensus on a Master List of Issues and procedures. It may be that after the exchange of the Initial Issues List, an Initial Party-in-Interest believes that other issues will need to be added to their list. The Initial Parties-In Interest will discuss during the "meet and confer" process if and how to include these additional issues.
4. Once a Master List of Issues is agreed upon by the Initial Parties-in-Interest (or a Master List of Issues is finalized that contains as much of a consensus as possible), New GM will circulate the Master List of Issues to other interested parties (which may include the GUC Trust, the GUC Trust Unitholders, and All Plaintiffs) to solicit their views on the Master List of Issues and the suggested procedures, and ask for a written response ("**Written Response**") within seven (7) days of receipt of the Master List of Issues, either agreeing to the Master List of Issues and procedures as presented, or identifying other issues for consideration.² One or more telephonic meet and confers will then take place with the Initial Parties-in-Interest and the Other Responsive Parties to discuss the Master List of Issues and any Written Response in order to work towards a consensus on a final Master List of Issues ("**Final Issues List**") and the procedures the Bankruptcy Court should adopt to resolve same ("**Proposed Procedures**").

² Other interested parties that provide a timely written response are referred to herein as "**Other Responsive Parties.**")

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5. Within three (3) business days prior to the Status Conference (to be scheduled by the Bankruptcy Court for October 2016³), New GM will submit to the Bankruptcy Court either:
 - a. the agreed-upon Final Issues List and Proposed Procedures; or
 - b. if the Initial Parties-in-Interest cannot reach consensus on an agreed-upon Final Issues List and/or Proposed Procedures: (i) the list of all agreed-upon issues and/or any agreed-upon procedures, and (ii) the additional issues and/or procedures the Initial Parties-in-Interest could not reach consensus on.

If you have any questions or need additional information, please let me know.

Very truly yours,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd

cc: Initial Group Set Forth On Schedule "1" Annexed Hereto.

³ A request for a status conference has previously been made by the letter to Judge Glenn, dated August 9, 2016 [Dkt. No. 13725] for October 5 or 6, 2016 (which has not been scheduled). New GM also requested by letter dated August 19, 2016 [Dkt. No. 13738] an earlier status conference for just the successor liability issue for the week of August 22, 2016 (which has not been scheduled).

SCHEDULE 1

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Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt No. 13655]

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Parties Subject to the Pilgrim Motion to Enforce

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