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Gibson, Dunn & Crutcher LLP

August 1, 2017

VIA ECF

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, Case No. 09-50026 (MG)

Dear Judge Glenn:

Wilmington Trust Company, trustee for and administrator of the Motors Liquidation Company GUC Trust, submits this letter in response to the letter from Gary Peller, dated July 25, 2017, requesting "discovery concerning whether due process violations in the notice provided prevents the 2009 Sale Order injunction from precluding [Non-Ignition Switch Plaintiffs'] claims." Dkt. 13997 at 1. While it is unclear whether Mr. Peller is seeking discovery from the GUC Trust, his request should be denied at this time for the reasons set forth in the letters from Designated Counsel in the Bankruptcy Court and Co-Lead Counsel in the MDL Court for the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs (Dkt. 14017) and New GM (Dkt. 14022).

Sincerely,

/s/ Mitchell A. Karlan

Mitchell A. Karlan

cc: Counsel of record, via CM/ECF