

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

In re:
MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a general motors corp., *et al.*,

Debtors.

Chapter 11
Case No. 09-50026 (MG)

(Jointly Administered)

**NOTICE OF THE PARTIES' JOINT FILING OF AMENDED OBJECTIONS TO
DEPOSITION DESIGNATIONS AND COUNTER-DESIGNATIONS**

The Parties¹ having conferred among themselves hereby give notice of their Amended Objections to the deposition designations and counter-designations originally submitted as Exhibits “H” through “P” of the Parties’ Joint Pre-Trial Order [ECF Nos. 14183-9 through 14183-17].

Pursuant to the *Pre-Trial Stipulation and Scheduling Order*, dated October 11, 2017 [ECF No. 14130] at ¶ 5, on December 5, 2017, the parties filed the [Proposed] Joint Pre-Trial Order [ECF No. 14183], which attached Exhibits “H” through “P,” consisting of the parties’ joint charts reflecting the deposition designations and counter-designations of Beth Andrews, James Barton, Daniel Golden, Keith Martorana, Melanie Mosley, Howard Steel, William Weintraub, Ed Weisfelner, and Matthew Williams, as well as the parties’ objections thereto [ECF Nos. 14183-9 through 14183-17]. The Parties have met and conferred in good faith and have reduced the number of objections over which there is still a dispute. Accordingly, attached hereto as Exhibits 1-9 are the Parties’ amended objections to the following deposition designations and counter-designations:

¹ The term “**Parties**” refers to the Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs, and certain Pre-Closing Accident Plaintiffs (collectively, “Plaintiffs”); the Participating Unitholders; the GUC Trust; and New GM.

- Beth Andrews – Exhibit 1 (replacing Exhibit H to the Pre-Trial Order, ECF No. 14183-9)
- James Barton – Exhibit 2 (replacing Exhibit I to the Pre-Trial Order, ECF No. 14183-10)
- Daniel Golden – Exhibit 3 (replacing Exhibit J to the Pre-Trial Order, ECF No. 14183-11)
- Keith Martorana – Exhibit 4 (replacing Exhibit K to the Pre-Trial Order, ECF No. 14183-12)
- Melanie Mosley – Exhibit 5 (replacing Exhibit L to the Pre-Trial Order, ECF No. 14183-13)
- Howard Steel – Exhibit 6 (replacing Exhibit M to the Pre-Trial Order, ECF No. 14183-14)
- William Weintraub – Exhibit 7 (replacing Exhibit N to the Pre-Trial Order, ECF No. 14183-15)
- Edward Weisfelner – Exhibit 8 (replacing Exhibit O to the Pre-Trial Order, ECF No. 14183-16)
- Matthew Williams – Exhibit 9 (replacing Exhibit P to the Pre-Trial Order, ECF No. 14183-17)

The Parties request that the attached Exhibits 1-9 serve to the replace Exhibits H through P of the Parties' [Proposed] Joint Pre-Trial Order (ECF Nos. 14183-9 through 14183-17) as filed on December 5, 2017.

Dated: December 16, 2017
New York, New York

Respectfully submitted,

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EXHIBIT 1

In re: MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of Beth Andrews and the GUC Trust and New GM's Objections Thereto

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
11:14	11:25	
16:20	16:25	
17:14	18:1	
18:15	18:18	
18:22	18:24	
22:14	22:20	
22:24	22:25	
25:2	25:9	
26:1	26:2	
26:6	26:13	
27:9	27:10	
27:14	27:16	
30:22	31:16	
39:11	39:16	
39:18	40:1	
40:5	40:14	
42:19	42:20	
42:23	43:6	
43:8	43:14	
46:8	47:9	
47:11	47:25	
48:5	49:10	
56:6	56:8	
56:12	56:15	
56:17	56:21	
59:3	59:16	
59:23	60:9	Relevance.
60:11	60:15	Relevance.
60:20	61:10	Relevance.
61:18	64:1	Relevance.
64:5	64:15	Relevance
64:19	64:20	Relevance
70:21	71:6	
71:8	71:9	

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
71:16	71:21	Vague and ambiguous; question is incomplete as stated.
72:13	72:15	
72:20	72:20	
72:21	73:25	Mischaracterizes testimony (73:21–73:25).
74:3	74:20	Mischaracterizes testimony (74:3-4).
74:25	75:8	
75:13	75:22	
75:25	76:9	
78:16	80:1	
80:15	81:6	
82:21	84:6	
89:24	90:3	Lack of Foundation (FRE 602)
90:9	90:18	Lack of Foundation (FRE 602)
90:21	90:22	
98:24	99:2	
99:7	99:21	
100:3	100:6	
100:17	100:19	
100:23	101:4	Vague and ambiguous.
101:7	101:8	Vague and ambiguous.
101:11	101:23	Vague and ambiguous; Lack of foundation (FRE 602 (101:13-23))
102:2	102:9	Vague and ambiguous; Lack of foundation (FRE 602) 102:2-3).
103:6	104:11	
104:14	104:22	
104:25	106:14	
107:2	109:2	
109:10	110:22	
110:25	111:21	Mischaracterizes testimony (111:13-21).
111:24	111:25	Mischaracterizes testimony.
115:4	115:7	
118:6	120:16	Calls for speculation; Lack of foundation (FRE 602) (120:12-16).
120:20	121:1	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (120:20-121:1).

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
121:8	121:15	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602).
122:5	122:18	
123:19	124:11	
124:23	125:2	
127:4	127:4	
127:10	127:11	
128:24	129:4	
130:22	131:23	
132:2	132:3	
132:12	134:15	
134:24	135:2	
135:5	135:12	
135:24	136:22	Vague and ambiguous; Lack of foundation (FRE 602) (136:15-22).
136:24	137:2	Vague and ambiguous; Lack of foundation (FRE 602).
137:17	138:15	Mischaracterizes testimony (138:10-15).
138:17	138:18	Mischaracterizes testimony.
138:23	139:11	Mischaracterizes testimony; Compound (FRE 611(a)); Lack of foundation (FRE 602) (139:4-11).
139:16	140:15	Mischaracterizes testimony; Compound (FRE 611(a)); Lack of foundation (FRE 602) (139:16); Lack of foundation (FRE 602) (140:9-23).
140:18	140:25	
142:1	143:4	
143:7	143:16	
143:20	144:1	
144:5	145:5	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (145:4-7).
145:7	145:18	
145:21	146:2	
146:6	146:15	
150:15	150:19	

Beth Andrews November 15, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
150:22	150:22	
152:1	152:11	
152:15	154:11	Cumulative (154:9-11).
154:15	155:24	Cumulative (154:15–155:1).

GUC Trust and New GM’s Counter Designations of the Deposition Testimony of Beth Andrews and the Plaintiffs and Participating Unitholders’ Objections Thereto

Beth Andrews November 15, 2017		
GUC Trust and New GM’s Counter Designations		Plaintiffs and Participating Unitholders’ Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
9:14	10:12	
18:3	18:5	
18:8	18:12	
23:2	23:15	
25:11	25:25	
28:13	28:25	
34:21	35:4	
41:15	41:17	
42:3	42:7	Incomplete/out-of-context (omits the relevant date discussion) (FRE 106); mischaracterizes testimony.
53:17	53:22	
54:24	55:4	
57:3	57:5	
68:6	68:13	This is not a valid counter-designation as it does not “complete” anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
68:15	68:19	This is not a valid counter-designation as it does not “complete” anything affirmatively

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		designated, and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
69:23	70:1	Not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106) ; 403 (more confusing than probative); vague and ambiguous; foundation (601, 602).
70:6	70:17	
72:8	72:12	Objection withdrawn if GUC/New GM properly completes the designation by designating the question to which this answer responds.
74:1	74:2	Improper designation of record objections (401-403 – irrelevant).
74:21	74:24	Improper designation of record objections (401-403 – irrelevant).
75:9	75:12	Incomplete and not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
77:21	78:4	
80:4	80:14	
82:11	82:20	Hearsay; not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
84:7	84:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); hearsay (801, 802).
88:22	89:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); hearsay (801, 802).
99:3	99:6	
100:7	100:9	Lacks foundation (601, 602); not a valid counter-designation for completeness or fairness purposes (FRE 106); calls for speculation.
100:13	100:16	Lacks foundation (601, 602); not a valid counter-designation for completeness or fairness purposes (FRE 106).
100:20	100:22	Improper designation of record objection.
101:5	101:6	Improper designation of record objections (401-403 – relevance).
104:12	104:13	Improper designation of record objections (401-403 – relevance).
104:23	104:24	Improper designation of record objections (401-403 – relevance).
110:23	110:24	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
112:1	112:7	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602).
112:12	113:3	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		foundation (601, 602); hearsay (801, 802).
113:7	113:20	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); hearsay (801, 802); hearsay within hearsay (804).
113:23	114:3	Not a valid counter-designation for completeness or fairness purposes (106).
120:17	120:19	Improper designation of record objections (401-403 – relevance).
121:2	121:7	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
125:7	125:15	
126:20	127:2	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
127:5	127:9	Not a valid counter-designation for completeness or fairness purposes (106); lacks foundation / personal knowledge (601, 602).
127:14	128:10	Incomplete (starts with an answer, preceding question not designated) (106); not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
132:4	132:7	Not a valid counter-designation for completeness or fairness purposes (106).

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
135:3	135:4	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
136:23	136:23	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
138:16	138:16	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
140:16	140:17	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
150:20	150:21	Improper designation of record objection, which is irrelevant (401-403), and the selective designation of certain record objections in the middle of designated testimony and not others is incomplete in and of itself.
154:12	154:14	Improper designation of record objection, which is irrelevant (401-403).
156:11	157:1	This is not a valid counter-designation to any of the designated content, and fairness/completeness requirements do not necessitate it being considered contemporaneously therewith (106).

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
158:1	158:4	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802).
158:7	158:22	Not a valid counter-designation for completeness or fairness purposes (106).
158:25	159:8	
163:12	163:15	Lacks foundation (601, 602); not a valid counter-designation (106); hearsay (801, 802); calls for speculation.
163:21	164:2	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/foundation (601, 602); hearsay (801, 802); calls for speculation.
164:9	164:17	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/foundation (601, 602); calls for speculation.

EXHIBIT 2

**In re MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of
James Barton and the Plaintiffs and Participating Unitholders' Objections Thereto**

James Barton November 22, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
18:15	18:16	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation).
18:24	19:7	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation).
21:8	21:17	
22:9	22:14	
39:7	39:12	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time).

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of James Barton and the GUC Trust and New GM's Objections Thereto**

James Barton November 22, 2017

Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
6:20	6:24	
7:7	7:8	
7:25	8:6	
10:4	10:8	
10:15	11:4	
12:14	12:14	
12:21	12:23	
13:8	14:13	
14:15	15:4	
16:11	16:17	
17:18	17:19	
21:8	22:17	
23:11	23:19	
24:18	24:21	
31:2	31:4	
31:7	31:15	
34:12	34:15	
35:21	36:6	
36:22	36:24	
37:10	37:12	
37:21	38:7	

GUC Trust and New GM's Counter-Designations of the Deposition Testimony of James Barton and the Plaintiffs and Participating Unitholders' Objections Thereto

James Barton November 22, 2017		
GUC Trust and New GM's Counter-Designations		Plaintiffs and Participating Unitholders' Objections
Counter-Designation Begin	Counter-Designation End	
19:23	20:2	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
20:5	20:5	Not a valid counter-designation for completeness or fairness purposes

James Barton November 22, 2017		
GUC Trust and New GM's Counter-Designations		Plaintiffs and Participating Unitholders' Objections
Counter-Designation Begin	Counter-Designation End	
		(106), Relevance (401)
20:9	20:10	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
20:12	20:14	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
21:4	21:7	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
23:20	24:1	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
24:12	24:17	Not a valid counter-designation for completeness or fairness purposes (106), Relevance (401)
32:22	33:9	Not a valid counter-designation for completeness or fairness purposes (106), argumentative, asked and answered, improper designation of record objection, which is irrelevant (401-403).
33:13	33:20	Not a valid counter-designation for completeness or fairness purposes (106), argumentative, asked and answered, improper designation of record objection, which is irrelevant (401-403).

Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of James Barton and the GUC Trust and New GM's Objections Thereto

James Barton November 22, 2017	
Plaintiffs and Participating Unitholders' Counter-Designations	GUC Trust and New GM Objections to Counter-

Counter-Designation Begin	Counter-Designation End	Designations
7:7	7:8	
8:4	8:6	
21:18	22:1	
24:18	24:21	
34:12	34:15	
36:17	36:24	
38:2	38:7	

EXHIBIT 3

**In re MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of
Daniel H. Golden and the Plaintiffs and Participating Unitholders' Objections Thereto**

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
14:14	14:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
15:11	15:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
15:19	15:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
15:25	16:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
17:10	17:14	
32:2	32:5	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
32:8	32:9	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
32:10	32:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
54:9	54:14	Irrelevant (FRE 401); calls for hearsay (FRE 802)
61:2	61:9	
61:10	61:13	
69:18	70:4	Objection to form vague and ambiguous (FRE 611(a))
70:7	70:8	
70:9	70:19	
72:23	73:14	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
73:15	73:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form compound (FRE 611(a))
73:22	74:10	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602);

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		objection to form compound (FRE 611(a))
74:11	74:14	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602); objection to form confusing (FRE 611(a))
74:16	74:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602); objection to form confusing (FRE 611(a))
74:19	74:22	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
74:23	75:6	Lack of foundation (FRE 602): irrelevant (FRE 401)
75:7	75:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
75:21	75:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
75:22	75:25	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
76:1	76:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
78:11	78:15	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
78:17	78:24	Objection to form compound

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		(611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
78:25	79:2	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
79:3	79:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
79:8	79:11	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
79:13	79:22	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
83:14	83:18	Lack of personal knowledge (FRE 602)
83:19	83:22	Lack of personal knowledge (FRE 602)
83:23	83:25	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form vague and ambiguous (FRE 611(a))
84:2	84:3	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form vague and ambiguous (FRE 611(a))
84:4	84:7	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
84:8	84:13	Irrelevant (FRE 401); lack of foundation, calls for expert opinion

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		(FRE 602, 701, 702); lack of personal knowledge (FRE 602)
84:15	84:17	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
91:2	91:16	Calls for hearsay (FRE 802)
91:17	91:19	Irrelevant (FRE 401); objection to form, vague, ambiguous, confusing (FRE 611(a))
91:22	91:23	Irrelevant (FRE 401); objection to form, vague, ambiguous, confusing (FRE 611(a))
107:1	107:14	
107:17	107:24	
110:1	110:2	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
110:5	110:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
111:20	112:1	Calls for hearsay (FRE 802)
112:2	112:7	Calls for hearsay (FRE 802)
130:13	130:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
130:19	130:20	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
130:21	130:23	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
133:14	133:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
133:19	133:19	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); objection to form confusing (FRE 611(a))
137:6	137:10	
137:13	137:13	
137:14	137:18	
141:18	142:3	Calls for hearsay (FRE 802)
146:6	146:15	
146:17	146:20	
151:11	151:15	

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
154:11	154:14	
154:15	154:19	Lack of foundation, calls for speculation (FRE 602)
154:20	154:20	
155:4	155:6	
160:4	160:25	
161:1	161:5	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
161:6	161:8	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
161:11	161:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
162:2	162:6	
163:2	163:5	
163:6	163:10	Calls for hearsay (FRE 802)
163:11	163:17	
163:18	163:24	
179:22	180:8	
180:9	180:23	
180:24	181:2	
181:3	181:6	
181:7	181:11	Calls for hearsay (FRE 802)
181:12	181:14	Calls for hearsay (FRE 802)
181:15	182:2	Lack of foundation, calls for speculation (FRE 602); Incomplete (FRE 106)
185:6	185:11	
185:12	186:1	Lack of foundation, calls for speculation (FRE 602)
188:11	188:13	
188:14	188:18	
191:7	191:17	
191:18	191:23	Lack of foundation, calls for speculation, calls for expert opinion (FRE 602, 701, 702)
202:23	203:8	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		(FRE 602, 701, 702)
203:9	203:9	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
203:11	203:12	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
207:8	207:11	
207:14	207:20	
207:21	208:13	Lack of foundation, calls for speculation, (FRE 602)
208:14	208:18	
208:20	208:21	
208:22	208:24	
209:14	209:17	Calls for hearsay (FRE 802)
210:6	210:6	Calls for hearsay (FRE 802)
210:7	210:9	Calls for hearsay (FRE 802)

Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of Daniel H. Golden and the GUC Trust and New GM's Objections Thereto

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
8:16	9:6	
11:15	11:21	
14:18	15:2	
15:8	15:9	
15:23	15:24	
18:14	19:7	
31:18	32:1	
32:6	32:7	
33:20	33:24	Hearsay (FRE 801/802/805));

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
		Outside the Scope of FRCP 32(a)(6)
34:5	36:11	Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
50:13	50:16	
50:19	51:11	
59:12	59:17	
59:24	60:5	
60:8	60:13	
60:17	60:19	
62:19	63:6	
70:5	70:6	
73:19	73:19	
73:21	73:21	
74:15	74:15	
75:19	75:20	
78:16	78:16	
79:12	79:12	
79:23	79:25	
80:8	80:17	
81:18	82:3	
84:1	84:1	
91:20	91:21	
107:25	108:14	
108:24	109:15	
110:3	110:4	
130:16	130:18	
133:18	133:18	
136:23	137:5	
137:11	137:11	
144:25	145:18	
145:21	146:5	
146:16	146:16	

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
148:17	148:25	
149:3	149:9	
150:14	151:10	
154:21	154:24	
159:23	160:3	
161:9	161:10	
162:21	163:1	
182:3	182:3	
188:4	188:10	
191:24	192:2	
199:18	200:10	
203:1	203:1	
203:10	203:10	
207:12	207:13	
208:19	208:19	
209:18	210:5	

EXHIBIT 4

In re: MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of Keith Martorana and the GUC Trust and New GM's Objections Thereto

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
9:21	11:14	
12:9	13:15	
13:17	14:10	
23:11	23:15	
23:19	23:20	
25:11	25:16	
25:19	25:25	
26:4	27:1	
27:6	27:19	
32:11	33:25	
35:9	35:12	
35:15	36:4	
36:11	36:12	
37:11	38:7	
38:16	38:18	
38:22	39:15	
39:18	43:6	
43:10	43:13	
51:25	52:2	
52:5	53:19	
53:24	54:4	
58:2	60:2	
60:16	61:8	
66:21	67:7	
67:18	68:3	
68:17	69:9	
69:11	69:19	
71:1	72:22	
73:17	73:20	
74:4	74:12	
75:21	76:8	
76:14	77:8	
83:9	83:23	Relevance.
84:16	85:15	Relevance.

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
85:22	86:1	Relevance; Incomplete quotation; Lack of foundation (FRE 602).
86:11	88:4	Relevance (86:11-88:4); Incomplete quotation; Lack of foundation (FRE 602) (86:11-25); Mischaracterizes testimony (88:1-4).
88:8	88:10	Relevance; Lack of foundation (FRE 602); Mischaracterizes testimony.
92:14	92:19	Lack of foundation (FRE 602); Mischaracterizes testimony.
92:24	93:2	Lack of foundation (FRE 602); Mischaracterizes testimony.
103:22	104:1	
104:5	104:6	
106:19	106:25	
107:4	107:10	
107:18	107:22	
108:1	108:6	
109:15	109:24	
110:6	110:8	Lack of foundation (FRE 602); Mischaracterizes testimony; designation is incomplete (it begins half-way through the witness' answer).
111:14	112:14	Attorney colloquy; Lack of foundation (FRE 602) (112:12-14).
112:16	112:19	Attorney colloquy; Lack of foundation (FRE 602).
112:23	113:25	Mischaracterizes testimony (113:19- 25).
114:5	114:10	
115:15	116:9	
116:13	116:14	
116:17	116:21	
118:7	118:13	
123:23	124:7	
125:17	125:20	
125:25	125:25	
126:13	126:16	
126:20	128:10	

Keith Martorana November 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
128:14	129:2	
129:6	129:25	
130:5	130:23	
131:19	132:7	Lack of foundation (FRE 602); Mischaracterizes testimony (132:3-7) .
132:10	132:20	Lack of foundation (FRE 602); Mischaracterizes testimony.
133:12	133:15	
134:20	135:25	
141:22	142:7	
148:25	149:12	
149:15	149:18	
155:7	155:11	
176:17	178:6	
178:20	179:23	
183:23	183:25	
184:4	184:19	
184:23	184:23	
194:14	196:1	Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (195:23-196:1).
196:9	197:8	Lack of foundation (FRE 602); Mischaracterizes testimony; Calls for speculation (196:9-12).
197:11	197:19	
200:21	200:22	
204:5	204:6	
216:8	216:9	
235:14	235:22	
236:1	236:23	

GUC Trust and New GM's Counter Designations of the Deposition Testimony of Keith Martorana and the Plaintiffs and Participating Unitholders' Objections Thereto

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
14:12	14:22	
27:21	28:4	This is not a valid counter-designation, as neither completeness or fairness requires that this designation be considered contemporaneously with the designations (FRE 106); Hearsay (801, 802)
35:13	35:14	Improper designation of counsel objection
36:9	36:10	Improper designation of counsel objection
60:3	60:13	
73:21	74:2	
78:12	79:4	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation/ personal knowledge (601, 602); speculation/ vague and ambiguous.
79:15	80:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation / personal knowledge (601, 602); calls for speculation.
80:25	81:13	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (FRE 106); lacks foundation/ personal knowledge (FRE 601, 602).

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
88:11	88:16	Hearsay (801, 802); lacks foundation/ personal knowledge and is vague and ambiguous ("we did not feel it was appropriate...")
92:21	92:23	Improper designation of counsel objection
93:3	93:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); hearsay (801, 802)
93:13	93:18	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
93:21	94:16	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); relevance (401-403); hearsay (801, 802)
108:8	108:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106).
108:15	109:14	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation/ personal knowledge (601, 602); improper opinion (701, 702); hearsay (801, 802); vague and ambiguous; more prejudicial than probative/ waste of time (401-403).
110:3	110:5	
129:4	129:5	Improper designation of counsel objection
130:1	130:2	Improper designation of counsel objection
132:8	132:9	Improper designation of counsel objection

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
149:13	149:14	Improper designation of counsel objection
154:1	155:6	Not a valid counter-designation for completeness or fairness purposes (FRE 106)
184:25	185:11	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
185:15	185:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); lacks foundation (601, 602); calls for speculation.
186:2	186:8	Not a valid counter-designation and is moreover incomplete on its own because it omits the answer to the question (106); even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation (601, 602); calls for speculation.
186:11	186:20	Not a valid counter-designation and is moreover incomplete on its own and out of context (106); includes improper record objections; 401-403 (more prejudicial than probative/ confusion of the issues/ waste of time); calls for speculation; lacks foundation/ personal knowledge (601, 602).
200:6	200:20	This is not a valid counter- designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106).
200:23	201:25	This is not a valid counter- designation, as neither completeness nor fairness requires that this designation be considered

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
		contemporaneously with the designated content (106); 801, 802, 701, 702, Lacks foundation (601, 602)
202:12	203:3	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay
203:8	203:18	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); further, it is in and of itself incomplete, as it omits the answer to the designated question on line 19 (106).
203:20	204:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702).
204:7	204:23	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); improper opinion (701, 702)
206:19	207:4	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); lacks foundation / personal knowledge (601, 602).

Keith Martorana November 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation Designation End	
208:7	208:12	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); 601, 602, calls for speculation.
211:22	212:15	First off, this is out-of-context and incomplete in and of itself (106); second, even if it were "complete" by itself, this is not a valid counter-designation to any of the content affirmatively designated (106); lacks foundation/ personal knowledge (601, 602); speculation/ vague and ambiguous.
214:10	215:9	This is not a valid counter-designation, as neither completeness nor fairness requires that this designation be considered contemporaneously with the designated content (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
216:1	216:7	This is not a valid counter-designation to any of the content affirmatively designated (106); hearsay (801, 802); lacks foundation (601, 602).

EXHIBIT 5

**In re MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of
Melanie Mosley and the Plaintiffs and Participating Unitholders' Objections Thereto**

Melanie Mosley November 22, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
14:23	14:25	106 (completeness/ fairness requires introduction of other evidence which ought in fairness be considered contemporaneously with this evidence, otherwise it is out of context); 401-403 (irrelevant; any minimal probative value is outweighed by risks of confusion of the issues/ waste of time).
15:4	15:11	106 (completeness/ fairness requires introduction of other evidence which ought in fairness be considered contemporaneously with this evidence, otherwise it is out of context); 401-403 (irrelevant; any minimal probative value is outweighed by risks of confusion of the issues/ waste of time).
17:4	17:9	106 (completeness/ fairness requires introduction of other portions of testimony which ought in fairness be considered contemporaneously); 401-403 (irrelevant to phase 1 issues, and any minimal relevance is outweighed by risks of confusion of the issues/ waste of time); 601, 602 (lacks foundation).
25:8	25:10	
25:13	25:15	

**Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony
of Melanie Mosley and the GUC Trust and New GM's Objections Thereto**

Melanie Mosley November 22, 2017

Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
18:24	19:10	

EXHIBIT 6

In re MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of
Howard Steel and the Plaintiffs and Participating Unitholders' Objections Thereto

Howard Steel November 8, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
9:11	9:16	
9:22	9:24	
10:10	10:21	
14:11	14:15	
14:24	15:19	
16:12	16:20	
17:14	17:17	
17:19	18:12	
18:19	19:7	
22:4	22:10	
23:6	23:12	
24:24	24:25	
25:2	25:15	
27:1	27:22	
28:1	28:11	
37:7	37:12	
51:15	52:2	
52:14	52:25	
53:2	53:9	
55:3	55:22	
66:11	66:13	
67:17	68:15	
68:21	69:3	
69:18	69:19	Improper record objection (401-403)
70:5	70:13	
70:14	70:19	
82:22	83:4	
83:11	83:25	
87:2	87:11	
87:24	89:21	
91:4	91:11	
91:20	92:19	
104:17	104:25	
105:7	105:9	

Howard Steel November 8, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
105:21	107:1	106:16-107:1 (FRE 602, lack of personal knowledge)
108:6	108:19	108:6-12 (FRE 602, lack of personal knowledge)
108:22	109:4	
109:9	109:23	
114:5	115:7	
117:4	117:24	
118:17	119:17	
125:7	125:13	

Plaintiffs and Participating Unitholders' Counter Designations of the Deposition Testimony of Howard Steel and the GUC Trust and New GM's Objections Thereto

Howard Steel November 8, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
10:22	10:25	Prejudicial, Confusing, Misleading (FRE 403); Lack of Foundation (FRE 602)
11:7	11:25	Prejudicial, Confusing, Misleading (FRE 403); Lack of Foundation (FRE 602)
12:12	13:14	Prejudicial, Confusing, Misleading (FRE 403); Lack of Foundation (FRE 602)
69:4	69:17	
81:2	82:6	Prejudicial, Confusing, Misleading (FRE 403)
82:9	82:13	Prejudicial, Confusing, Misleading (FRE 403)
82:19	82:21	

Howard Steel November 8, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
115:22	117:3	Prejudicial, Confusing, Misleading (FRE 403); Relevance (FRE 401/402)
119:18	120:13	
123:16	125:6	Prejudicial, Confusing, Misleading (FRE 403)

EXHIBIT 7

In re MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of William Weintraub and the Plaintiffs and Participating Unitholders' Objections Thereto

William Weintraub November 9, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
8:8	8:9	
9:17	10:2	
10:11	10:23	
11:18	12:4	
13:12	13:18	
13:22	14:7	FRE 602 (lack of personal knowledge); FRE 701; FRE 702 (improper expert testimony)
14:9	14:24	FRE 701, FRE 702 (improper expert testimony)
18:18	19:19	18:24 – FRE 401 (irrelevant); FRE 403 19:3 – FRE 401 (irrelevant); FRE 403 19:9-19 – FRE 401 (irrelevant); FRE 403
22:4	22:8	
25:5	25:15	
27:2	27:4	
27:7	27:9	
31:22	31:25	
32:3	32:4	
38:2	32:8	38:2-8 – FRE 401 (irrelevant); FRE 403; FRE 801, 802 (hearsay)
42:25	43:5	
43:10	43:14	
44:12	44:16	
45:12	45:22	45:12-17 – FRE 602 (lack of personal knowledge)
46:1	46:9	45:18-46:9 – FRE 602 (lack of personal knowledge)
47:18	48:3	
48:12	49:6	
50:20	51:10	51:4-5 – FRE 401 (irrelevant); FRE 403

William Weintraub November 9, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
54:23	55:4	
56:8	56:17	
60:2	61:8	
61:11	61:21	
61:25	62:1	
63:11	63:23	
64:13	64:18	
65:17	65:25	
66:18	66:24	
67:7	67:10	
67:12	67:16	
70:9	70:23	
71:17	72:7	
73:22	74:12	
74:20	75:1	
76:3	79:23	
84:21	84:24	FRE 602 (lack of personal knowledge); FRE 701; FRE 702 (improper expert testimony)
85:5	85:19	
88:8	88:9	
88:16	88:24	
89:2	89:15	
91:9	91:13	
91:20	92:17	
93:6	93:12	

Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of William Weintraub and the GUC Trust and New GM's Objections Thereto

William Weintraub November 9, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
14:25	15:16	
19:24	20:5	
21:24	22:3	

William Weintraub November 9, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
25:16	26:11	
27:10	27:14	
48:4	48:11	
49:7	49:20	
55:5	55:9	
64:5	64:12	
65:7	65:16	
72:8	72:23	
73:9	73:21	
75:7	75:18	
93:13	94:5	
96:20	97:4	
97:7	97:11	
97:23	97:24	
98:1	98:4	

EXHIBIT 8

In re MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026

GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of
Edward Weisfelner and the Plaintiffs and Participating Unitholders' Objections Thereto

Edward Weisfelner November 8, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
14:24	15:14	
15:21	15:23	
17:18	17:24	
22:13	22:16	
24:1	24:9	
24:15	25:9	
28:11	28:24	
30:5	30:17	
31:4	31:14	
33:15	34:5	
34:11	35:4	
38:9	40:7	
43:24	44:10	
44:20	45:3	
46:9	46:15	
46:23	47:14	
48:10	50:1	
50:6	51:11	
56:4	56:19	
57:12	58:20	
59:5	59:16	
62:17	63:7	
63:16	64:20	
65:23	66:5	
78:16	78:25	
79:5	80:21	
82:11	83:21	82:23-83:21 (FRE 401, 402, irrelevant)
84:9	84:20	
84:25	85:7	
87:8	88:18	
88:23	89:25	
90:11	91:4	
91:7	91:21	

Edward Weisfelner November 8, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
95:25	96:15	
98:20	99:2	
99:4	99:15	
99:21	100:4	
105:1	105:6	105:1-6 (FRD 602, lack of personal knowledge)

Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of Edward Weisfelner and the GUC Trust and New GM's Objections Thereto

Edward Weisfelner November 8, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
28:25	28:25	
45:4	45:8	
58:21	59:4	
80:22	80:24	Relevance (FRE 401/402); Lack of Foundation (FRE 602)
84:21	84:24	
88:19	88:22	
90:6	90:10	
91:22	92:15	
99:16	99:21	Lack of Foundation (FRE 602)
104:9	104:25	

EXHIBIT 9

**In re: MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al., No. 09-50026**

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition
Testimony of Matthew J. Williams and the GUC Trust and New GM's Objections Thereto**

Matthew J. Williams November 13 and 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
12:7	12:17	
12:21	13:10	
16:3	16:7	
19:21	20:3	
29:14	29:25	
30:6	30:20	
56:2	57:3	
59:6	59:10	
59:14	59:17	Designation of answer at 59:14-17 is incomplete.
59:20	60:15	
63:2	63:16	
64:4	64:11	Lack of foundation and personal knowledge (FRE 602) (64:4-10).
64:16	64:24	
65:18	65:23	
66:1	66:11	
66:24	67:8	Lack of foundation and personal knowledge (FRE 602); Mischaracterizes testimony.
67:13	68:1	
68:18	69:5	
69:16	69:19	
69:23	70:7	Mischaracterizes testimony (70:5-7).
70:10	70:15	
80:2	80:5	Mischaracterizes testimony.
80:10	80:17	
85:18	86:9	
90:8	91:8	
93:18	94:2	
99:6	99:13	
99:15	99:16	

Matthew J. Williams November 13 and 20, 2017		
Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM's Objections
Designation Begin	Designation End	
101:1	101:8	
103:13	103:24	
104:18	105:2	
130:15	130:24	
136:10	137:7	
144:24	145:3	
145:7	145:9	
147:11	147:18	
148:5	148:6	Improper Characterization
148:9	148:14	
148:22	149:4	Lack of foundation (FRE 602); Mischaracterizes testimony;
149:14	149:17	
150:24	151:3	
151:8	152:5	
152:9	152:17	
163:6	163:12	
164:8	164:19	
184:19	185:5	
188:11	188:13	
227:23	228:4	
228:14	228:16	
230:25	231:12	
232:2	232:3	
232:5	232:6	
243:24	244:1	

GUC Trust and New GM's Counter Designations of the Deposition Testimony of Matthew J. Williams and the Plaintiffs and Participating Unitholders' Objections Thereto

Matthew J. Williams November 13 and 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
16:9	16:14	This designation (counter or not) is incomplete in and of itself (106); even if it were "complete" by itself, this is not a proper valid counter-designation to any of the content affirmatively designated (FRE 106); lacks foundation/ personal knowledge (FRE 601, 602)
16:17	16:18	Incomplete (FRE106); does not "complete" anything that in fairness should be introduced contemporaneously with the affirmative designations (FRE106); lacks foundation/personal knowledge
28:23	29:13	
30:1	30:5	
46:16	46:22	
59:11	59:13	Improper record objection (FRE 401-403)
60:1	60:13	
63:17	63:20	
64:1	64:3	
67:9	67:10	Improper record objection (FRE 401-403)
79:21	79:24	
84:3	84:6	
94:3	94:6	Not a valid counter-designation and completeness/fairness does not require its inclusion contemporaneously with the affirmatively designated testimony (106).
94:7	94:9	Not a valid counter-designation and completeness/fairness does not require its inclusion contemporaneously with the affirmatively designated testimony

Matthew J. Williams November 13 and 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		(106)
94:21	95:3	
95:6	96:15	
97:15	98:1	Not a valid counter-designation to the affirmatively designated content (FRE 106); Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
98:21	99:5	
99:14	99:14	
99:17	100:11	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); Calls for speculation (FRE 602); incomplete (FRE 106); not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106).
100:20	100:25	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); Calls for speculation (FRE 602); incomplete (FRE 106); not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106).
101:12	101:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); Calls for speculation (FRE 602); incomplete (FRE 106); not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106).
126:20	127:3	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered

Matthew J. Williams November 13 and 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802).
127:4	128:7	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802).
128:10	128:14	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); impermissible hearsay (FRE 802); relevance (FRE 401-403)
128:15	129:2	Not a valid counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106); Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
130:5	130:14	Incomplete/ not a valid counter- designation under FRE 106; Lack of foundation, calls for expert testimony (FRE 602, 701, 702)
134:21	135:5	Incomplete (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
135:7	135:18	Hearsay (FRE 801, 802); lack of foundation/ personal knowledge (FRE 601, 602); incomplete (FRE 106); not a proper counter- designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE

Matthew J. Williams November 13 and 20, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		106).
136:5	136:9	
138:20	139:1	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); calls for speculation (FRE 602)
142:4	143:8	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
145:10	145:24	Incomplete and out-of-context in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires that this be considered contemporaneously with the affirmative designations (FRE 106);
146:9	147:7	Incomplete in and of itself without the insertion of Plaintiffs'/ Participating Unitholders' counter-counter-designations at 147:11-18, 148:5-6, and 148:9-14 (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
147:21	148:4	Incomplete in and of itself without the insertion of Plaintiffs'/ Participating Unitholders' counter-counter-designation at 147:11-18, 148:5-6, and 148:9-14 (FRE 106); not a proper counter-designation, as

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
149:5	149:10	Improper record objection (FRE 401-403).
153:24	154:5	Not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
154:8	155:2	Improper counter-designation (FRE106) (does not complete any content affirmatively designated); Lack of foundation (FRE 602)
155:15	155:25	Lack of foundation, speculation (FRE 602); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
156:15	157:25	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
158:1	159:24	Hearsay (801, 802)
162:7	163:2	This is not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); moreover, on its own, this excerpt is out of context and incomplete without the insertion of Plaintiffs' / Participating Unitholders' counter-counter-designations at 163:6-12 and 164:8-

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		19 (FRE 106)
164:20	164:25	This is not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); moreover, on its own, this excerpt is out of context and incomplete (FRE 106); hearsay (FRE 801, 802).
166:3	166:25	This is not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); moreover, on its own, this excerpt is out of context and incomplete (FRE 106).
167:7	167:9	Incomplete in and of itself (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
186:2	187:13	Calls for hearsay (FRE 802); incomplete (answer designated without the preceding question, and fairness requires the insertion of Plaintiffs' / Participating Unitholders' counter-counter-designations at 188:11-13) (FRE 106); not a proper counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); speculative/lacks foundation (FRE 601, 602).
187:21	188:6	Calls for speculation (FRE 602);

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		incomplete (answer designated without the preceding question, and fairness requires the insertion of Plaintiffs' / Participating Unitholders' counter-counter-designations at 188:11-13) (FRE 106); not a proper counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
191:13	192:3	Incomplete (FRE 106); not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); improper record objection (FRE 401-403).
192:20	193:5	Incomplete (answer designated without the preceding question) (FRE 106); not a proper counter-designation because neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); speculation.
193:9	193:10	Not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106).
193:15	193:20	Not a proper counter-designation, as neither completeness nor fairness requires this be considered contemporaneously with the affirmative designations (FRE 106); incomplete in and of itself (FRE 106); speculation / lack of

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		foundation (FRE 601, 602).
198:14	199:14	
200:1	201:9	Calls for hearsay (FRE 802); Objection to form vague and ambiguous (FRE 611(a)); Objection to the form confusing (FRE 611(a)); Objection to the form compound (FRE 611(a))
201:18	202:4	
228:17	229:3	
239:24	240:19	Calls for hearsay (FRE 802); Calls for speculation (FRE 602)
242:23	243:23	Calls for hearsay (FRE 802); Lack of personal knowledge (FRE 602); Calls for speculation (FRE 602); Objection to form, asked and answered (FRE 611(a)); not a proper counter-designation (FRE 106).
244:2	244:3	