

WHEREAS, Goodwin Procter, LLP (“**Goodwin**”) represents the law firms of Hilliard Martinez Gonzales L.L.P. (“**HMG**”) and Thomas J. Henry Injury Attorneys (“**TJHIA**”) in connection with their representation of claimants asserting personal injury and wrongful death claims against the debtors in the above-captioned chapter 11 cases (“**Old GM**”) and General Motors LLC (“**New GM**”).

WHEREAS, on December 22, 2016, Goodwin filed that certain *Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] (the “**Motion**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Motion (the “**Movants**”). Attached as Exhibit B to the Motion were copies of each Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

WHEREAS, on December 4, 2017, Goodwin filed a *Notice of Withdrawal As Counsel Of Record For Certain Movants Under Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] [Docket No. 14179], pursuant to which Goodwin withdrew as counsel to thirty Movants that were no longer clients of HMG and TJHIA pursuant to Order No. 137 entered in the multi-district litigation pending before the Honorable Jesse M. Furman of the United States District Court for the Southern District of New York, *In re General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (JMF) (S.D.N.Y.) (the “**MDL**”) [MDL Docket No. 4840].

WHEREAS, on March 22, 2017, in connection with the MDL, claimant Glenn Stanley voluntarily dismissed his claims [MDL Docket No. 3769].

WHEREAS, on January 24, 2018, HMG and TJHIA notified claimant April Gill of the withdrawal of those firms as Ms. Gill's counsel. HMG and TJHIA did not file a motion to withdraw in the MDL because Ms. Gill did not have a complaint or claims pending in the MDL.

WHEREAS, on February 22, 2018, in connection with the MDL, claimant Dwayne Waithe voluntarily dismissed his claims. [MDL Docket No. 5096].

WHEREAS, on February 27, 2018, in connection with the MDL, the following claimants voluntarily dismissed their claims: John Hairston, Richard Rooney, Elizabeth Burns, Willie Shells, Chelsea Dirks Vargas, and Kim Lopez [MDL Docket No. 5142].

WHEREAS, on March 2, 2018, in connection with the MDL, claimant Tracy West voluntarily dismissed her claims [MDL Docket No. 5159].

WHEREAS, Goodwin, HMG and TJHIA have learned that claimant Kally Surbeck filed a timely proof of claim in the Debtors' cases (claim no. 13046), which was allowed. HMG and TJHIA continue to represent Ms. Surbeck in the MDL.

WHEREAS, Goodwin, HMG and TJHIA have learned that claimant Lisa Allen has entered into a settlement agreement that purported to release her claims against Old GM.

WHEREAS, claimant Santoria Gibbs has terminated HMG and TJHIA as her counsel. HMG and TJHIA have not yet filed, but will file, a formal motion to withdraw in the MDL.

WHEREAS, on March 9, 2018, in connection with the MDL, claimant Mary Gibson's claims were dismissed [MDL Docket No. 5195].

WHEREAS, on May 24, 2017, HMG and TJHIA notified claimants Veronica Lynn Davis, Marjorie Lockhart, Justin Maclin, Myra Washington, Joell Platzke, Julie Moza, Richard Moza, Shirely Pylar, and Janet Reetz, of the withdrawal of those firms as these claimants'

counsel. HMG and TJHIA did not file a motion to withdraw in the MDL because these claimants did not have a complaint or claims pending in the MDL.

WHEREAS, those certain Movants listed on Exhibit A hereto (the “**Affected Movants**”) are no longer pursuing claims relating to their pre-closing accidents and/or are no longer clients of HMG or TJHIA.¹

WHEREAS, those certain Affected Movants marked with an “*” on Exhibit A (the “**Claim Withdrawn Movants**”) have affirmatively consented to HMG and TJHIA withdrawing their proofs of claim from the Motion.

NOW THEREFORE, PLEASE TAKE NOTICE THAT, pursuant to Rule 2090-1(f) of the Local Bankruptcy Rules for the Southern District of New York, Goodwin withdraws as counsel of record for the Affected Movants in these chapter 11 cases and will not be prosecuting the Motion on behalf of the Affected Movants.

PLEASE TAKE FURTHER NOTICE THAT, the Claim Withdrawn Movants hereby affirmatively withdraw their proofs of claim from the Motion.

PLEASE TAKE FURTHER NOTICE THAT, a list of the Movants on whose behalf Goodwin continues to pursue the Motion is attached hereto as Exhibit B. HMG and TJHIA will provide the Affected Movants with this notice in order to give them an opportunity to find replacement counsel to join in the Motion or otherwise pursue authority to file a late proof of claim in these chapter 11 cases.

¹ Kally Surbeck, however, remains a client of HMG and THJIA. As noted on Exhibit A, she has affirmatively consented to the withdrawal of her proof of claim from the Motion.

Dated: April 25, 2017

Respectfully submitted,

/s/ William P. Weintraub
William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
Tel.: 212.813.8800
Fax: 212.355.3333
wweintraub@goodwinlaw.com
gfox@goodwinlaw.com

*Counsel for Ignition Switch Pre-Closing
Accident Plaintiffs Represented by
Hilliard Martinez Gonzales L.L.P.
Listed on Exhibit B Hereto*

EXHIBIT A – AFFECTED MOVANTS²

1. Lisa Allen
2. Elizabeth Burns*
3. Veronica Lynn Davis
4. Santoria Gibbs
5. Mary Gibson
6. April Gill
7. John Hairston*
8. Marjorie Lockhart
9. Kimberly Lopez
10. Justin Maclin
11. Myra Washington
12. Julie Moza
13. Richard Moza
14. Joell Platzke
15. Shirley Pylar
16. Janet Reetz
17. Richard Rooney*
18. Willie Shells*
19. Glenn Stanley
20. Kally Surbeck*³
21. Chelsea Vargas*
22. Dwayne Waithe
23. Tracy West*

² Those Affected Claimants marked with an “*” have affirmatively consented to the withdrawal of their proofs of claim from the Motion.

³ Kally Surbeck affirmatively withdraws her proof of claim from the Motion, however, HMG and TJHIA continue to represent her in the MDL.

EXHIBIT B – UNAFFECTED MOVANTS

1. Christine Albert
2. Vangie Anderson
3. Horace Atkinson, individually, and as representative of the estate of Tammeye Jan Atkinson
4. Sandra Baylor, individually and as next friend of Kyle Wojciechowski
5. Keith Bennett
6. Walter Bennett
7. Kathleen Bonito
8. Alicia Bowyer
9. Linda Braxton
10. Sandra Bremenkamp
11. Joseph Brooks
12. Rose Brooks
13. Cathalina Brown
14. Amanda Buckley
15. Connell Caldwell
16. Nicole Carter
17. Dessie Chandler
18. Hans Charles
19. Donna Collins, individually and as next friend of Billy Collins
20. Ruth Cuthbertson
21. Gayla Deforest
22. Michelle Delhommer, individually and as next friend of Justice Delhommer and Justin Kyle
23. Michael Deming
24. Peter Doinidis Jr.
25. Alan Dyer, individually and as representative of the estate of Emma Dyer
26. Margaret Dyer
27. Kesha Edmonson
28. Shiza Edwards
29. Abraham Elias
30. Diane Elias
31. Michael Elias
32. Kristi Fair
33. Edward Ferruolo
34. Robert Fish
35. Jessica Fleming
36. Sandra Gibbs
37. Robert Gillespie
38. Tiffany Gomez
39. Catherine Gordon
40. Crystal Greene
41. Stephanie Grooms
42. Kevin Gross

43. Michelle Groves
44. Robert Haislah
45. Donnie Hamilton
46. Paul Harmon
47. Wade Hawes
48. Deana Hemminger
49. Roderick Hill
50. Wesley Hubbard
51. Erik Hultgren
52. Gwendolyn James
53. Robert Jennings
54. Michael Johansen
55. Jason Johndro
56. Kara Johnson
57. Volanda Jones
58. Gloria Kage
59. Rahseda Kalilou
60. Michael Kavanaugh
61. William Keller
62. Andrea Laird
63. James Latimer
64. Nachel Leblanc
65. Gilbert LeDay
66. Janeshea Leonard
67. Kevin Lissner
68. Jenna Loree
69. Mark Love
70. Teeynesha Love
71. Kon Lueth
72. Patricia Lynch
73. Patricia McCloud
74. Sharon McGhee
75. Randall McPherson
76. Eileen Mency
77. Melanie Mosley
78. Edson Myers
79. Ashley Page
80. Sammie Page
81. Kenneth Pearce
82. Sharon Powell
83. Katherine Prados
84. Jami Pruitt
85. Jose Quintanilla
86. Rosalita Quintanilla
87. Samuel Raniolo
88. Justin Robbins

89. Miranda Robinson
90. Dailene Rodgers
91. Rafael Rodriguez
92. Samara Roura
93. Amy Ruppert
94. Carla Santiago
95. Deborah Scroggins
96. Patricia Shinko
97. Deidra Shipman
98. Rodney Sims
99. Clara Small
100. George Smith
101. Rickey Sorrells
102. Christina Spencer
103. Carol Spiller
104. Deborah Stanley
105. Cheryl Stevens
106. Aliana Strauss
107. Marshell Swafford
108. Johnnie Sykes
109. Kenya Taylor
110. Teresa Thomison
111. Hilda Vasquez
112. Erica Walker
113. Tionnte Walker
114. Isaac Warren
115. Diana Watkins
116. Rhonda Weston
117. Virginia White
118. Ashley Wiley
119. Alexander Williams
120. Johnny Wilson
121. Vernessa Wright
122. George Zamora