



To: The Honorable Martin Glenn, United States Bankruptcy Judge:

The Ignition Switch Plaintiffs<sup>1</sup> and certain Non-Ignition Switch Plaintiffs<sup>2</sup> (together, the “**Economic Loss Plaintiffs**”) hereby join (the “**Joinder**”) in the Request for Adjournment of Hearing set forth in paragraph 36 of the *Objection and Reservation of Rights of General Motors LLC with Respect to Motion of Avoidance Action Trust for Entry of an Order Approving the Proposed Distribution Plan*, dated July 29, 2019 [ECF No. 14572] (the “**New GM Objection**”) and respectfully state as follows:

1. By this Joinder, the Economic Loss Plaintiffs hereby join the request set forth in paragraph 36 of the New GM Objection to adjourn the hearing on the AAT Distribution Motion<sup>3</sup> from August 5, 2019 at 2:00 p.m. to August 12, 2019 at 10:00 a.m., or at a later time, to be heard at the same time as the GUC Trust Distribution Motion.<sup>4</sup>

2. The adjournment is requested to allow the AAT Distribution Motion and the GUC Trust Distribution Motion to be heard at the same time given the substantial overlap of issues raised by these Motions. Further, Co-Lead Counsel will be attending a MDL status conference before Judge Furman on August 15, 2019 at 9:30 a.m. Accordingly, the Economic Loss Plaintiffs further request that, if at all possible, the hearing on the Motions take place in the

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<sup>1</sup> The term “**Ignition Switch Plaintiffs**” shall mean those plaintiffs asserting economic loss claims or persons suffering economic losses who, prior to July 10, 2009, owned or leased a vehicle with an ignition switch defect included in Recall No. 14V-047 (the “**Ignition Switch Defect**”).

<sup>2</sup> The term “**Non-Ignition Switch Plaintiffs**” shall mean those plaintiffs asserting economic loss claims or persons suffering economic losses who, prior to July 10, 2009, owned or leased a vehicle with defects in ignition switches, side airbags or power steering included in Recall Nos. 14V-355, 14V-394, 14V-400, 14V-118 and 14V-153.

<sup>3</sup> *Motion of Motors Liquidation Company Avoidance Action Trust for Entry of an Order Pursuant to Sections 105 and 1142 of the Bankruptcy Code and Bankruptcy Rule 3020 Approving the Distribution Plan to the Avoidance Action Trust’s Beneficiaries*, dated July 8, 2019 [ECF No. 14552] (the “**AAT Distribution Motion**”).

<sup>4</sup> *Motion of Wilmington Trust Company, as GUC Trust Administrator, for an Order (A) Authorizing the Expedited Payment of Excess GUC Distributable Assets Pursuant to Section 5.4 of the GUC Trust Agreement, and (B) Approving such Distribution as an Appropriate Exercise of the GUC Trust Administrator’s Rights, Powers and/or Privileges Pursuant to Section 8.1(e) of the GUC Trust Agreement*, dated July 23, 2019 [ECF No. 14565] (the “**GUC Trust Distribution Motion**,” together with the AAT Distribution Motion, the “**Motions**”).

afternoon of August 15, 2019 to accommodate travel schedules for out of town Co-Lead Counsel.

Dated: July 30, 2019  
New York, New York

Respectfully submitted,

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