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April 24, 2014

**VIA HAND DELIVERY
AND ECF**

Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

Re: *In re Motors Liquidation Co.*, Case No. 09-50026 (REG)
Groman v. General Motors LLC, Adv. Pro. Case No. 14-1929 (REG)

Dear Judge Gerber:

We, along with Wolf Haldenstein Adler Freeman & Herz LLP, are co-counsel to plaintiffs (“Plaintiffs”) in the above-referenced adversary proceeding (“Adversary Proceeding”), which we commenced by complaint (the “Complaint”) on April 21, 2014. I wish to be heard at the May 2, 2014 Conference, and my colleague Alexander Schmidt from Wolf Haldenstein will be available to address questions the Court may have about the related class actions and MDL proceeding.

On April 22, 2014, we submitted a letter summarizing the relief we sought in the Complaint and requested that matters relating to the Complaint be considered together with GM’s request for a conference on its motion to enforce the July 5, 2009 Sale Order and Injunction (“Motion to Enforce”). Pursuant to the Court’s April 22, 2014 and April 23, 2014 Orders (Case No. 09-50026, Doc. No. 12627; Adv. Pro Case. No. 14-1929, Doc. No. 3), Plaintiffs hereby supplement their April 22 letter, as permitted by the Court, by respectfully requesting that the following matters be placed for discussion on the May 2, 2014 status conference agenda:

1. A deadline for General Motors LLC (“GM”) to file a responsive pleading to the Complaint. In the event that GM determines to move to dismiss the Complaint, a briefing schedule for that motion.
2. A date by which any and all interested parties shall commence an adversary proceeding seeking relief similar to that sought in the Complaint.
3. The consolidation or coordination of all adversary proceedings commenced by the above-referenced deadline.

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4. A briefing schedule for Plaintiffs to oppose the Motion to Enforce and whether it should be coordinated with discovery (including any expedited discovery)/briefing with respect to the Complaint.
5. Whether the briefing schedule(s) should be staggered to avoid duplication, for example, by setting a deadline for Plaintiffs to oppose the Motion to Enforce followed two weeks later by a deadline for other interested parties to file non-redundant oppositions, followed by a deadline for GM to reply to all filed oppositions.
6. A consolidated discovery schedule for the Adversary Proceeding and the Motion to Enforce.
7. Whether discovery on both matters should be expedited.
8. The May 29, 2014 JPML Hearing.
9. The possibility of mediation of the parties' claims and requests for relief in connection with the Adversary Proceeding and Motion to Enforce.

Respectfully submitted,



Jonathan L. Flaxer