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April 30, 2014

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

Re: *In re Motors Liquidation Company, et al.*
Case No. 09-50026 (REG)

Dear Judge Gerber:

This firm is bankruptcy co-counsel with (1) Kessler Topaz Meltzer & Check, LLP and the Miller Law Firm, PC, attorneys for the plaintiff and the putative Class in the matter entitled Peggy Sue Jones, Individually and on Behalf of All Others Similarly Situated v. General Motors, LLC, Case No. 2:14-cv-11197-GAD-DRG (E.D. Mich.); and (2) Robbins Geller Rudman & Dowd, LLP and Paradis Law Group, PLLC, attorneys for the plaintiff and the putative Class in the matter entitled Larry Darby, Individually and on Behalf of All Others Similarly Situated v. General Motors, LLC and Delphi Automotive PLLC, Case No. 5:14-cv-00676 (C.D. Cal.) (collectively, the “**Proposed Lead Plaintiffs**”).

We write with respect to the Bankruptcy Court’s Order setting the conference for May 2, 2014 regarding “New GM’s” Motion to enforce the Court’s Sale Order and Injunction (the “**Motion**”). In accordance with that Order, we advise the Court of our desire to be heard, if necessary, at the conference with respect to the interests of the Proposed Lead Plaintiffs as they relate to the Motion. We participated in a recent meeting and have communicated with the other plaintiffs’ groups in an effort to coordinate among the groups and not burden the Court with duplicative arguments and written submissions. However, to the extent that we are of the opinion that any matter concerning our clients is not adequately addressed, we reserve our right to be heard and participate in all phases of the process.

With respect to the agenda for the conference, we anticipate the following, along with those agenda items identified by other plaintiffs’ counsel:

1. The establishment of a protocol or independent case management order leading to an evidentiary hearing with respect to the Motion and expedited discovery in connection with the motion prior to any such evidentiary hearing.
2. The establishment of a meet and confer period whereby the parties can attempt to craft a case management order relating to the Motion and stipulate to as many of the material facts as possible.

Honorable Robert E. Gerber
April 30, 2014
Page 2

3. The interplay between the Motion before this Court and the pending MDL.
4. The interplay between the Motion and the recently filed related adversary proceeding.

We expect that additional discussions will occur between counsel for the other plaintiffs and potentially with counsel for New GM over the next two days concerning the agenda and that we will be included in those discussions. To the extent that those conversations lead to the submission of additional proposed agenda items, we will advise the Court of our position as necessary.

Respectfully,

/s/ Michael S. Etkin

Michael S. Etkin

MSE/ldf