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July 1, 2014

**BY HAND DELIVERY AND ECF FILING**

The 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 Honorable Judge Gerber:

Please be advised that this firm, together with co-counsel Kaplan Fox & Kilsheimer LLP and Michaels Law Group, are counsel for Martin Ponce (Class Action #7 on New GM's Schedule "1" – Chart of Ignition Switch Actions, Case No. 2:14-cv-02161 filed 3/21/14 in the C.D. Cal.) and Kimi L. Hurst (Class Action #31 on New GM's Schedule "1" – Chart of Ignition Switch Actions, Case No. 2:14-cv-02619 filed 4/7/14 in the C.D. Cal.), each individually and as a class representative on behalf of all similarly situated persons.

Pursuant to this Court's endorsed order dated April 22, 2014 [Docket No. 12627] and scheduling order entered on May 14, 2014 [Docket No. 12697], we write to indicate our desire to be heard, if necessary, at the conference scheduled for July 2, 2014 (the "Conference"). We have conferred with the law firms of Brown Rudnick LLP as Designated Counsel, Otterbourg P.C. as liaison counsel and Wolf Haldenstein Adler Freeman & Herz LLP and Golenbock Eiseman Assor Bell & Peskoe as co-counsel to the Groman Plaintiffs. It is our understanding that these firms will be the primary counsel speaking on behalf of the interests of the various plaintiffs and their respective counsel. We trust that counsel will address the issues pertaining to the Court's agenda for the Conference that are relevant to our clients' pleadings and positions during the Conference. However, our clients reserve the right to make



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a short statement to the Court to the extent that other counsel do not address an issue of particular importance to them, or the Court desires additional input with respect to the issues that are raised at the Conference.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Michael E. Foreman", with a large, sweeping flourish at the end.

Michael E. Foreman

cc: (by email)

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