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May 5, 2015

VIA E-MAIL
AND ECF FILING

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

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

Dear Judge Gerber:

We write as Designated Counsel and Counsel for Economic Loss Plaintiffs, joined by co-Designated Counsel and Counsel for Economic Loss Plaintiffs, Designated Counsel and Counsel for Pre-Sale Accident Victim Plaintiffs, and Counsel for General Motors LLC ("New GM"), in response to Your Honor's Endorsed Order of May 5, 2015.

We apologize for not sending the Court a copy of the April 29, 2015, joint letter to Judge Furman. The failure to file a copy of the April 29 letter with the Bankruptcy Court was an oversight and it will not happen again.

Lead Counsel for Plaintiffs in the MDL and New GM (the "Parties") together with their Bankruptcy Counsel initially agreed to hold off on a formal, in person, meet and confer until after an April 24, 2015 status conference that had been scheduled by Judge Furman to discuss, among other things, the impact of Your Honor's Decision on the Motion to Enforce the Sale Order with respect to the Pre-Sale Consolidated Complaint. See MDL Order No. 47. Although the Parties were directed to file a formal letter by April 29, 2015, Judge Furman asked the Parties to be prepared to discuss the issue at the April 24 status conference. Since the MDL Counsel and the Bankruptcy Counsel were all scheduled to attend the April 24 conference, and it was believed that the April 24 conference might shed further light on the Pre-Sale Consolidated Complaint issue (which was relevant to the preparation of the Judgment), it was decided to meet in person that day, after the conference, to discuss how to prepare the Judgment for submission to the Bankruptcy Court. Prior to the April 24 conference, there had been telephonic conferences among counsel as to what should be included in the Judgment.

Following the April 24 status conference, the Parties exchanged views in person as contemplated by Your Honor's Decision on Motion to Enforce Sale Order. Since that date, the Parties, their Bankruptcy Counsel, Counsel for Wilmington Trust Company as GUC Trust Administrator and Counsel for Participating

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GUC Trust Unit Holders have had a lengthy in person meeting and, both before and after such meeting, draft forms of judgment have been exchanged.

We continue to narrow the issues between these parties. By the deadline set in the Endorsed Order, the parties will either present a fully consensual form of judgment to the Court for its consideration, or lodge proposed forms of judgment with the Court (highlighting any points of disagreement).

Because most or all of the parties will be in Bankruptcy Court on Thursday, May 7, the parties can update the Court further following the hearing on the Phillips (Powledge) matter.

Lastly, the Parties and their Bankruptcy Counsel also apologize for any impression given in the April 29 letter that we are not taking seriously Your Honor's direction to promptly meet and confer and attempt to negotiate an agreed form of judgment. Those discussions between the Parties began before the date of the April 29 letter and are ongoing.

Respectfully submitted,

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