

# KING & SPALDING

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December 13, 2016

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Martin Glenn  
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 (MG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, yesterday, Judge Furman entered a “text only” order in MDL 2543 granting in part and denying in part a letter motion filed by the Elliott, Sesay and Bledsoe Plaintiffs for leave to file amended complaints and to remand certain claims. A copy of the relevant excerpt from the docket of MDL 2543 is attached hereto as **Exhibit “A.”**

Respectfully submitted,

*/s/ Scott Davidson*

Scott Davidson

SD/hs  
Encl.

cc: Parties Set Forth On Schedule “1” Annexed Hereto.

**SCHEDULE 1**

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Honorable Martin Glenn  
December 13, 2016  
Page 3

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Honorable Martin Glenn  
December 13, 2016  
Page 4

**Parties to the Motion to Enforce, filed by New GM on June 1, 2016 [Dkt. No. 13634]**

<p>Tab Turner, Esq. TURNER &amp; ASSOC. 4705 Somers Ave., S-100, North Little Rock, AR 72116 T: 501-791-2277 – Phone tab@tturner.com</p> <p><i>Counsel for Tibbetts and Chapman Plaintiffs</i></p>	<p>William Weintraub, Esq. Gregory Fox, Esq. GOODWIN PROCTER LLP The New York Times Building 620 Eighth Avenue New York, NY 10018 T: 212-813-8800 wweintraub@goodwinprocter.com gfox@goodwinprocter.com</p> <p><i>Designated Counsel for Certain Pre-Sale Accident Plaintiffs and Post-Sale Accident Plaintiffs</i></p>
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**Parties to the Motion to Enforce filed by New GM on June 24, 2016 [Dkt. No. 13655]**

<p>Laurence B. Springberg, Esq. THOMAS &amp; SPRINGBERG 844 East Sahara Ave. Las Vegas, NV 89104-3017 T: (702) 731-9222 lspringberg@thomasandspringberg.com</p> <p><i>Counsel for the Atanaw Plaintiff</i></p>	<p>Martin E. Regan, Esq. REGAN LAW PLC 2125 St Charles Ave. New Orleans, LA 70130 T: (504) 522-7260 mregan@reganlaw.net lrayon@reganlaw.net</p> <p><i>Counsel for the Barbot Plaintiffs</i></p>
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Honorable Martin Glenn  
December 13, 2016  
Page 5

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<p>Steven J. Crowley, Esq. CROWLEY, BUNGER &amp; PRILL 3012 Division St. Burlington, IA 52601 T: (319) 753-1330 scrowley@cbp-lawyers.com</p> <p><i>Counsel for the Boker Plaintiffs</i></p>	<p>Michael Andrews, Esq. BEASLEY, ALLEN, CROW, METHVIN, PORTIS &amp; MILES, P.C. P.O. Box 4160 Montgomery, Alabama 36104 mike.andrews@beasleyallen.com</p> <p><i>Counsel for the Neal Plaintiffs</i></p>
<p>Paul Minix 2330 Quail Lane Longview, Texas 75602</p> <p><i>Minix – Pro Se Plaintiff</i></p>	

**Parties Subject to the Pilgrim Motion to Enforce**

<p>André E. Jardini, Esq. K.L. Myles, Esq. KNAPP, PETERSEN &amp; CLARKE 550 North Brand Boulevard, Suite 1500 Glendale, CA 91203 T: (818) 547-5000 aej@kpclegal.com klm@kpclegal.com</p> <p><i>Counsel for the Pilgrim Plaintiffs</i></p>	<p>Sean C. Southard, Esq. Brendan M. Scott, Esq. KLESTADT WINTERS JURELLER SOUTHARD &amp; STEVENS, LLP 200 West 41st Street, 17th Floor New York, NY 10036 T: (212) 972-3000 ssouthard@klestadt.com bscott@klestadt.com</p> <p><i>Counsel for the Pilgrim Plaintiffs</i></p>
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Honorable Martin Glenn  
December 13, 2016  
Page 6

**Other Parties**

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# **EXHIBIT A**

**U.S. District Court  
Southern District of New York (Foley Square)  
CIVIL DOCKET FOR CASE #: 1:14-md-02543-JMF**

In re: General Motors LLC Ignition Switch Litigation  
Assigned to: Judge Jesse M. Furman  
Referred to: Magistrate Judge James L. Cott (Settlement)  
Related Cases: 1:14-cv-04265-JMF

Date Filed: 06/12/2014  
Jury Demand: Defendant  
Nature of Suit: 370 Other Fraud  
Jurisdiction: Federal Question

- 1:14-cv-04267-JMF
- 1:14-cv-04268-JMF
- 1:14-cv-04270-JMF
- 1:14-cv-04272-JMF
- 1:14-cv-04273-JMF
- 1:14-cv-04338-JMF
- 1:14-cv-04339-JMF
- 1:14-cv-04340-JMF
- 1:14-cv-04342-JMF
- 1:14-cv-04345-JMF
- 1:14-cv-04346-JMF
- 1:14-cv-04348-JMF
- 1:14-cv-04350-JMF
- 1:14-cv-02714-JMF
- 1:14-cv-04630-JMF
- 1:14-cv-04632-JMF
- 1:14-cv-04637-JMF
- 1:14-cv-04641-JMF
- 1:14-cv-04650-JMF
- 1:14-cv-04662-JMF
- 1:14-cv-04661-JMF
- 1:14-cv-04667-JMF
- 1:14-cv-04672-JMF
- 1:14-cv-04676-JMF
- 1:14-cv-04684-JMF
- 1:14-cv-04686-JMF
- 1:14-cv-04690-JMF
- 1:14-cv-04691-JMF
- 1:14-cv-04692-JMF
- 1:14-cv-04699-JMF
- 1:14-cv-04701-JMF
- 1:14-cv-04685-JMF
- 1:14-cv-04702-JMF
- 1:14-cv-04704-JMF
- 1:14-cv-04707-JMF
- 1:14-cv-04714-JMF
- 1:14-cv-04715-JMF



*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED*

V.

All Plaintiffs

**GM Ignition Switch MDL Plaintiffs**

represented by **Elizabeth J. Cabraser**  
(See above for address)  
*LEAD ATTORNEY  
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**Robert Hilliard**  
(See above for address)  
*LEAD ATTORNEY  
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**Steve W. Berman**  
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All Plaintiffs

**Debbie Hearden**

represented by **Jason Paul Johnston**  
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V.

Trustee

**Wilmington Trust Company**

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Date Filed	#	Docket Text
12/12/2016	3584	ORDER granting in part and denying in part (3516) Letter Motion for Leave to File Amended Complaints in the Elliott, Sesay, and Bledsoe Cases and for Entry of an Order Suggesting Remand. Upon review of the parties' letters, Mr. Peller's motion for leave to file amended complaints is GRANTED. In light of (among other things) the stay imposed by MDL Order No. 50, the Court sees little downside to allowing the amendments (and no real prejudice to New GM). In fact, there is potential benefit to having operative pleadings that reflect the significant legal developments that have

occurred since the current complaints were filed and that include any and all claims that Plaintiffs want to press. Accordingly, Mr. Peller's motion for leave to file amended complaints is granted; he shall file amended complaints in each of the member cases no later than December 19, 2016. (The Court reserves judgment on whether and to what extent Mr. Peller's clients should be permitted to request discovery as part of the MDL. Counsel should meet and confer with respect to any such request by Mr. Peller.) By contrast, Mr. Peller's motion for entry of an order of remand is denied without prejudice. Among other things, the Court is persuaded that the claims at issue are sufficiently intertwined with the bankruptcy proceedings and the claims in the MDL to justify keeping them as part of the MDL for now. (HEREBY ORDERED by Judge Jesse M. Furman)(Text Only Order) Filed In Associated Cases: 1:14-md-02543-JMF, 1:14-cv-06018-JMF, 1:14-cv-07631-JMF, 1:14-cv-08382-JMF (Furman, Jesse) (Entered: 12/12/2016)