

TYLER LAW FIRM

Professional Limited Liability Corporation

B. A. Tyler, Esq.
btyler@tyler-legal.com

Attorneys at Law
3001 West Big Beaver Road, Suite 704
Troy, MI 48084

248.458.6600
Fax: 248.458.6006

www.tyler-legal.com

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Via PRIORITY MAIL and EMAIL
(asteinberg@kslaw.com)
(sdavidson@kslaw.com)

Arthur Steinberg, Esq.
Scott Davidson, Esq.
KING & SPALDING, LLP
1185 Avenue of the Americas
New York, New York 10036

RE: Kevin Honaker, Personal Representative of the Estate of Mariah J. Bailey-Collins, deceased v General Motors, LLC, Vic Canever Chevrolet, Inc., Hartland Towing & Garage and Regal Recycling, Inc.
Genesee County Circuit Court Case No.: 15-105613-NP

Dear Sirs:

With respect to Mr. Davidson's correspondence of December 16, 2016 and the Order to Cause it is our position that our vehicle (2008 Chevrolet Cobalt - VIN 1G1AL18F387162873) is a "Subject Vehicle" as noted on page 13 of the Order. As such, the above lawsuit represents an "Independent Claim", as noted on page 12, and is not subject to the bankruptcy proceedings.

If you disagree, please immediately notify me and the basis for your position. Thank you for your attention in this matter. I remain,

Very truly yours,



B. A. TYLER



BAT:dmw

Cc: Clerk of the Court – U.S. Bankruptcy Court, Southern District of New York
(Case no. 09-50026(MG))
Michael Cooney – GM counsel (via e-mail)
Boyd White, III – GM counsel (via e-mail)