

Steve W. Berman (admitted *pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, Washington 98101  
Telephone: 206-623-7292  
Email: steve@hbsslaw.com

Edward S. Weisfelner  
BROWN RUDNICK LLP  
Seven Times Square  
New York, New York 10036  
Telephone: 212-209-4800  
Email: eweisfelner@brownrudnick.com

Elizabeth J. Cabraser  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, California 94111  
Telephone: 414-956-1000  
Email: ecabraser@lchb.com

Sander L. Esserman  
STUTZMAN, BROMBERG,  
ESSERMAN & PLIFKA, P.C.  
2323 Bryan Street, Suite 2200  
Dallas, Texas 75201  
Telephone: 214-969-4900  
Email: esserman@sbep-law.com

*Co-Lead Counsel for the Ignition Switch  
Plaintiffs and Certain Non-Ignition Switch  
Plaintiffs in the MDL Court*

*Designated Counsel for the Ignition  
Switch Plaintiffs and Certain Non-Ignition  
Switch Plaintiffs in the Bankruptcy Court*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	: :
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i> ,	: :
	: :
Debtors.	: (Jointly Administered)
-----X	

**APPELLANT IGNITION-SWITCH PLAINTIFFS' AND CERTAIN  
NON-IGNITION SWITCH PLAINTIFFS' STATEMENT OF THE ISSUES ON APPEAL  
AND DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure, the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs (the "Appellants"), by and through their undersigned counsel, respectfully submit the following statement of issues to be presented on appeal and designation of items for inclusion in the record on appeal in connection with the

Appellants’ appeal from the *Memorandum Opinion and Order Deciding Certain 2016 Threshold Issues*, dated July 12, 2017 (ECF No. 13992) (the “Order”).<sup>1</sup>

**STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL**

1. Did the Bankruptcy Court err in holding that used car purchasers without the Ignition Switch Defect are bound by the Sale Order?

2. Did the Bankruptcy Court err in holding that used car purchasers without the Ignition Switch Defect had no greater rights than the prior owners or original purchasers of the vehicles?

**DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

The Appellants designate each of the following documents from the above-captioned proceeding for inclusion in the record on appeal.

	<b>Filing Date</b>	<b>ECF No.</b>	<b>Description</b>
1.	7/5/2009	2968	Order (I) Authorizing the Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief
2.	6/1/2015	13177	Judgment
3.	12/4/2015	13563	Judgment
4.	12/13/2016	13802	Order to Show Cause Regarding Certain Issues Arising from Lawsuits with Claims Asserted Against General Motors LLC (“New GM”) that Involve Vehicles Manufactured by General Motors Corporation (“Old GM”)
5.	2/27/2017	13857	Benjamin W. Pillars’ Supplemental Opening Brief
6.	2/27/2017	13859	Pilgrim Plaintiffs’ Supplemental Opening Brief on the 2016 Threshold Issues
7.	2/27/2017	13861	The <i>Elliott, Sesay, and Bledsoe</i> Plaintiffs’ Supplemental Opening Brief Regarding the 2016 Threshold Issues

<sup>1</sup> Capitalized terms used by not defined herein shall have the meanings ascribed to them in the Order.

8.	2/27/2017	13863	Supplemental Opening Brief by Plaintiffs Christopher Pope and Gwendolyn Pope on the 2016 Threshold Issues
9.	2/27/2017	13865	Opening Brief by General Motors LLC on the 2016 Threshold Issues Set Forth in the Order to Show Cause Dated December 12, 2017 (Except for the Late Proof of Claim Issue)
10.	2/27/2017	13866	Plaintiffs' Joint Opening Brief on the 2016 Threshold Issues
11.	4/7/2017	13888	Reply Brief by General Motors LLC on the 2016 Threshold Issues Set Forth in the Order to Show Cause Dated December 13, 2016 (Except for the Late Proof of Claim Issue)
12.	4/7/2017	13889	Plaintiffs' Joint Reply Brief on the 2016 Threshold Issues
14.	4/24/2017	13907	Transcript Regarding Hearing Held on 4/20/2017 9:03 A.M. RE: Order to Show Cause
15.	5/19/2017	13943	Transcript Regarding Hearing Held on 5/17/2017 9:04 A.M. RE: Order to Show Cause in Reference to Threshold Issue
16.	7/12/2017	13992	Memorandum Opinion and Order Deciding Certain 2016 Threshold Issues
17.	7/26/2017	14006	Notice of Appeal (Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs)

Dated: August 9, 2017  
New York, New York

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Edward S. Weisfelner  
Edward S. Weisfelner  
Howard S. Steel  
BROWN RUDNICK LLP  
Seven Times Square  
New York, New York 10036  
Tel: 212-209-4800  
eweisfelner@brownrudnick.com  
hsteel@brownrudnick.com

Sander L. Esserman  
STUTZMAN, BROMBERG, ESSERMAN &  
PLIFKA, A PROFESSIONAL CORPORATION  
2323 Bryan Street, Ste 2200  
Dallas, Texas 75201  
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