

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 | FAX (212) 849-7100

September 27, 2017

VIA ELECTRONIC CASE FILING & HAND DELIVERY

Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004

Re: **In re Motors Liquidation Co., et al.**, Case No. 09-50026 (MG) (Bankr. S.D.N.Y.);
Letter Regarding Update On Related Proceedings

Dear Judge Glenn:

We are co-counsel to General Motors LLC ("**New GM**") with King & Spalding LLP and Kirkland & Ellis LLP in the above-referenced matter.

Pursuant to Judge Gerber's Endorsed Order dated May 5, 2015 [ECF No. 13131], New GM writes to update the Court regarding developments in proceedings related to New GM. Specifically, today, September 27, 2017, an Order was entered on the docket in MDL 2543 [ECF No. 4640] which states as follows:

ORDER re: [4639] LETTER addressed to Judge Jesse M. Furman from Richard C. Godfrey, P.C. dated September 26, 2017 re: Representational Authority Issues. Lead Counsel shall file a response to New GM's letter no later than October 2, 2017, at 10 a.m. SO ORDERED. (Signed by Judge Jesse M. Furman on 9/27/2017) (Text Only Order)(Furman, Jesse)

A copy of the ECF docket entry No. 4640 is attached hereto.

Respectfully submitted,



James C. Tecce

cc: Mitchell A. Karlin, Esq. (counsel to GUC Trust)
Jonathan Fourtney, Esq. (counsel to GUC Trust)
Steve W. Berman, Esq. (counsel to Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs)
Elizabeth J. Cabraser, Esq. (counsel to Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs)
William P. Weintraub, Esq. (counsel to Ignition Switch Pre-Closing Accident Plaintiffs)
Gregory W. Fox, Esq. (counsel to Ignition Switch Pre-Closing Accident Plaintiffs)
Edward S. Weisfelner, Esq. (counsel to Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs)

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE | LONDON | TOKYO | MANNHEIM | MOSCOW |
HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS

Howard S. Steel, Esq. (counsel to Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs)

Sander L. Esserman (counsel to Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs)

Daniel H. Golden (counsel to Participating Unitholders)

Deborah Newman (counsel to Participating Unitholders)

Richard Hilliard, Esq. (counsel to Certain Ignition Switch Pre-Closing Accident Plaintiffs)

Richard C. Godfrey, P.C. (counsel to New GM)

Andrew B. Bloomer, P.C. (counsel to New GM)

Leonid Feller, P.C. (counsel to New GM)

Arthur J. Steinberg, Esq. (counsel to New GM)

David Fine, Esq. (counsel to New GM)

Scott Davidson, Esq. (counsel to New GM)

EXHIBIT 1

Steve W. Berman
(See above for address)
ATTORNEY TO BE NOTICED

All Plaintiffs

Debbie Hearden

represented by **Jason Paul Johnston**
Meshbeshier & Sepnce, Ltd
1616 Park Avenue
Minneapolis, MN 55404
(612)-767-5129
Fax: (612)-339-9188
Email: jjohnston@meshbeshier.com
LEAD ATTORNEY

V.

Trustee

Wilmington Trust Company

represented by **Gabriel Kalman Gillett**
Gibson, Dunn & Crutcher, LLP (NY)
200 Park Avenue
New York, NY 10166
(212)-351-2656
Fax: (212)-716-0858
Email: ggillett@gibsondunn.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Lisa Heather Rubin
Gibson, Dunn & Crutcher, LLP (NY)
200 Park Avenue, 48th Floor
New York, NY 10166
(212)-351-2390
Fax: (212)-716-0790
Email: lrubin@gibsondunn.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Mitchell Alan Karlan
Gibson, Dunn & Crutcher, LLP (NY)
200 Park Avenue
New York, NY 10166
212-351-3827
Fax: 212-351-5254
Email: mkarlan@gibsondunn.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
09/27/2017	4640	ORDER re: <u>4639</u> LETTER addressed to Judge Jesse M. Furman from Richard C. Godfrey, P.C. dated September 26, 2017 re: Representational Authority Issues. Lead Counsel shall file a response to New GM's letter no later than October 2, 2017, at 10 a.m. SO ORDERED. (Signed by Judge Jesse M. Furman on 9/27/2017) (Text Only Order)(Furman, Jesse) (Entered: 09/27/2017)

11/27/2017
11/27/2017
11/27/2017

11/27/2017
11/27/2017

11/27/2017

11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017

11/27/2017
11/27/2017

11/27/2017

11/27/2017

11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017

11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017

11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017
11/27/2017

11/27/2017
11/27/2017
11/27/2017

11/27/2017

11/27/2017

Date	Time	Description
10/1/17	10:00	Meeting with [redacted] regarding [redacted]
10/2/17	11:30	Meeting with [redacted] regarding [redacted]
10/3/17	14:00	Meeting with [redacted] regarding [redacted]
10/4/17	15:00	Meeting with [redacted] regarding [redacted]
10/5/17	16:00	Meeting with [redacted] regarding [redacted]