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Attorneys for General Motors LLC

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

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
	:
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**GENERAL MOTORS LLC’S COUNTER-DESIGNATION
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD
ON APPEAL REGARDING THE APPEAL OF THE
BANKRUPTCY COURT’S AUGUST 31, 2017 OPINION [ECF NO. 14087]**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), General Motors LLC (“**New GM**”) submits this counter-designation of additional items to be included in the record on appeal in connection with the appeal of the *Memorandum Opinion and Order Enforcing Provisions of Sale Order Regarding Assumption of Product Liability Claims of Kaitlyn Reichwaldt*, dated August 31, 2017 [ECF No. 14087] (the “**August 2017 Opinion**”).

COUNTER-DESIGNATION OF RECORD

In addition to the items designated by Appellant in her *Statement of Issues and Designation of Record on Appeal* [ECF No. 14123], New GM submits the following designation of additional items to be included in the record on appeal of the August 2017 Opinion (including any exhibit, annex, appendix or addendum thereto):

<u>Item No.</u>	<u>Date Filed</u>	<u>Description</u>	<u>Docket No.</u>
1.	12/4/2015	Judgment of the Bankruptcy Court, dated December 4, 2015.	13563
2.	12/13/2016	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”).	13802
3.	12/21/2016	Certificate of Service of the 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), entered on December 13, 2016.	13804
4.	2/27/2017	Opening 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).	13865
5.	2/27/2017	Plaintiffs’ Joint Opening Brief on the 2016 Threshold Issues.	13866
6.	4/07/2017	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).	13888
7.	4/07/2017	Plaintiffs’ Joint Reply Brief on the 2016 Threshold Issues.	13889

Dated: New York, New York
October 12, 2017

Respectfully submitted,

/s/ Arthur Steinberg

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