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February 1, 2019

**VIA EMAIL 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)**

Dear Judge Glenn:

We write on behalf of the Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs (together, the "**Economic Loss Plaintiffs**"), certain Pre-Closing Accident Plaintiffs, and the Motors Liquidation Company GUC Trust (the "**GUC Trust**," together with the Economic Loss Plaintiffs and certain Pre-Closing Accident Plaintiffs, the "**Parties**"), in connection with the Parties' Settlement Agreement filed with the Court today.

The Economic Loss Plaintiffs have filed *The Economic Loss Plaintiffs' Motion to: (1) Extend Bankruptcy Rule 7023 to These Proceedings; (2) Approve the Form and Manner of Notice; (3) Grant Class Certification for Settlement Purposes Upon Final Settlement Approval; (4) Appoint Class Representatives and Class Counsel for Settlement Purposes; and (5) Approve the Settlement Agreement by and Among the Signatory Plaintiffs and the GUC Trust Pursuant to Rule 23* [ECF No. 14408], seeking, *inter alia*, approval of the Settlement Agreement under Rule 23. As set forth in the Settlement Agreement, the Pre-Closing Accident Plaintiffs and the GUC Trust support the relief requested in this motion.

The GUC Trust has filed the *Motion of Motors Liquidation Company GUC Trust to Approve (I) the GUC Trust Administrator's Actions, (II) the Settlement Agreement By and Among the Signatory Plaintiffs and the GUC Trust Pursuant to Bankruptcy Code Sections 105, 363, and 1142 and Bankruptcy Rules 3002, 9014, and 9019, and (III) to Authorize the Reallocation of GUC Trust Assets* [ECF No. 14409], seeking, *inter alia*, approval of the Settlement Agreement under Bankruptcy Rule 9019. The Economic Loss Plaintiffs and Pre-Closing Accident Plaintiffs support the relief requested in this motion.

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Previously, the Parties, together with the Pre-Closing Accident Plaintiffs represented by Hilliard Muñoz Gonzales L.L.P., the Law Offices of Thomas J. Henry, and Goodwin Procter LLP (the “**Hilliard/Henry Plaintiffs**”) informed the Court of their on-going settlement negotiations and expressed that they anticipated entering into a new settlement and filing a motion for approval by January 31, 2019. *See Joint Status Letter*, dated Dec. 12, 2018 [ECF No. 14383]. The short delay in this anticipated filing was engendered by the abrupt, last minute refusal last night by the Hilliard/Henry Plaintiffs to execute the Settlement Agreement, for reasons currently unknown. Regardless, the terms of, and expectations under the Settlement Agreement otherwise remain the same, and the Parties stand committed to obtaining Court approval of the Settlement Agreement and the relief requested in the motions referenced above.

Respectfully submitted,

/s/ Edward S. Weisfelner

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cc: Counsel of Record via CM/ECF