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February 14, 2019

**VIA E-MAIL AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

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WASHINGTON D.C.

**Re: In re Motors Liquidation Company, et al., Case No. 09-50026 (MG)**

Dear Judge Glenn:

On January 21, 2019, Celestine and Lawrence Elliott filed the *Elliotts' Motion to Lift Bar Date and Proposed [Late] Proof of Claims* [ECF No. 14399] (the "Trailblazer Late Claim Motion"). The Elliotts are pre-Sale purchasers of a 2006 Chevrolet Trailblazer that was subject to certain recalls for a faulty master door power module.

On February 11, 2019, the GUC Trust filed the *Objection of Wilmington Trust Company, as GUC Trust Administrator, to Elliotts' Motion to Lift Bar Date and File Proposed Late Proof of Claim* [ECF No. 14417]. In addition, on February 11, 2019, New GM filed the *Joinder of General Motors LLC to Objection of Wilmington Trust Company, as GUC Trust Administrator, to Elliotts' Motion to Lift Bar Date and File Proposed Late Proof of Claim* [ECF No. 14418]. I note also that the Trailblazer Late Claim Motion and each of the GUC Trust and New GM's responses thereto were timely filed in accordance with the schedule proposed by the parties at the December 20, 2018 case management conference, and endorsed by the Court.

The Trailblazer Late Claim Motion is now fully briefed. The GUC Trust respectfully requests that the Court schedule oral argument for this matter and proposes March 5, 2019 at 10:00 a.m., as the Court has another motion in these bankruptcy cases already scheduled for hearing that day. We have contacted counsel for the Elliotts and counsel for New GM and they are available on March 5. We also remain available for a hearing on the Trailblazer Late Claim Motion at another date to be determined by the Court.

Respectfully submitted,

/s/ Kristin K. Going

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