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March 27, 2020

VIA ECF AND OVERNIGHT DELIVERY

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

Re: Letter Update Regarding In re Motors Liquidation Company Case No. 09-50026(MG)

Dear Judge Glenn:

The undersigned is counsel to Wilmington Trust Company, solely in its capacity as Trust Administrator and Trustee of the Motors Liquidation Company GUC Trust (the “GUC Trust”). Pursuant to Endorsed Order Dkt. 13131, we write to inform Your Honor of the pleadings that were filed in MDL 2543 today in connection with the settlement between New GM, the Economic Loss Plaintiffs and the GUC Trust that is more fully described in the motion that was filed today in this Court captioned *GUC Trust Administrator’s Motion for Entry of an Order (I) Approving the GUC Trust Administrator’s Actions; (II) Approving the Settlement Agreement and the Release Agreement Pursuant to Federal Rule of Bankruptcy Procedure 9019; and (III) Authorizing the Reallocation of GUC Trust Assets* [ECF No. 14691].

Specifically,

(1) copies of *Notice of Joint Motion and Joint Motion of (i) General Motors LLC, (ii) the Motors Liquidation Company GUC Trust, and (iii) the Economic Loss Plaintiffs to Withdraw the Reference of the Economic Loss Plaintiffs’ Motion for an Order Granting Authority to File Late Class Proofs of Claim and Related Filings* [ECF No. 14693] and *Joint Memorandum of Law by (i) General Motors LLC, (ii) the Motors Liquidation Company GUC Trust, and (iii) the Economic Loss Plaintiffs in Support of Their Motion to Withdraw the Reference of the Economic Loss Plaintiffs’ Motion for an Order Granting Authority to File Late Class Proofs of Claim and Related Filings* [ECF No. 14695] are collectively attached hereto as Exhibit A and

(2) copies of the *Notice of Joint Motion and Joint Motion for Preliminary Approval of Class Settlement, Approval of Notice Procedures, and Appointment of Class Counsel & Class Representatives* (MDL 2543 ECF No. 7816), *Memorandum in Support of the Parties’ Joint Motion for Preliminary Approval of Class Settlement, Certification of Class for Purposes of Settlement, Approval of Notice Procedures, and Appointment of Class Counsel & Class Representatives* (MDL 2543 ECF No. 7817), *Declaration of Steven W. Berman in Support of Joint Motion for Preliminary Approval of Class*

March 27, 2020
Page 2

Settlement, Certification of Class for Purposes of Settlement, Approval of Notice Procedures, and Appointment of Class Counsel & Class Representatives (MDL 2543 ECF No. 7818), Declaration of Elizabeth J. Cabraser in Support of Joint Motion for Preliminary Approval of Class Settlement, Certification of Class for Purposes of Settlement, Approval of Notice Procedures, and Appointment of Class Counsel & Class Representatives (MDL 2543 ECF No. 7819) and Declaration of Court-Appointed Economic Loss Mediator, Layn R. Phillips, in Support of Preliminary Approval of Class Settlement (MDL 2543 ECF No. 7820) are collectively attached hereto as Exhibit B.

We are available if the Court has any questions or needs additional information.

Respectfully submitted,

s/ Kristin Going

Kristin Going

cc: Edward S. Weisfelner, Esq. (via e-mail and ECF)
Paul M. Basta, Esq. (via e-mail and ECF)
Arthur Steinberg, Esq. (via e-mail and ECF)
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