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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
<i>f/k/a General Motors Corp., et al.</i>	:	
	:	(Jointly Administered)
Debtors.	:	
-----	X	

**JOINDER OF GENERAL MOTORS LLC TO
THE GUC TRUST’S OMNIBUS OBJECTION TO MOTIONS FILED BY
CERTAIN PRE-CLOSING ACCIDENT PLAINTIFFS FOR AUTHORITY TO FILE
LATE PROOFS OF CLAIM FOR PERSONAL INJURIES AND WRONGFUL DEATHS**

General Motors LLC (“New GM”) hereby joins in the arguments made in *The GUC Trust’s Omnibus Objection to Motions Filed by Certain Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* (the “GUC Trust”

Objection”), filed by the Motors Liquidation Company GUC Trust Administrator (the “GUC Trust”) on April 20, 2020. In support of this Joinder, New GM states as follows:

JOINDER AND RESERVATION OF RIGHTS

1. New GM respectfully joins in the GUC Trust Objection filed in response to the *Omnibus Motion by Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [ECF No. 13807] (the “Initial Goodwin Motion”) and the *Supplemental Omnibus Motion by Certain Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths in Connection with Settlement with the Motors Liquidation Company GUC Trust* [ECF No. 14325] (the “Supplemental Goodwin Motion” and, together with the Initial Goodwin Motion, the “Goodwin Motions”) filed by Goodwin Procter LLP, and the *Motion by Additional Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [ECF No. 14018], as supplemented on August 10, 2017, September 19, 2017, December 12, 2017, and July 19, 2018 [ECF Nos. 14046, 14112, 14195, 14346], and as further supported by the *Brief in Support of Motion Filed by Additional Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Death* [ECF No. 14690], (collectively, the “Andrews Motion” and, together with the Goodwin Motions, the “PIWD Motions”) filed by Andrews Myers, P.C.

2. New GM supports the relief requested in the GUC Trust Objection and hereby reserves its rights to be heard at any hearing regarding any of the PIWD Motions on any of the grounds set forth in the GUC Trust Objection.

WHEREFORE, New GM joins in the GUC Trust Objection and respectfully requests that the relief requested in the PIWD Motions be denied in all respects.

Dated: April 20, 2020
New York, New York

/s/ Paul M. Basta
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