

**Hearing Date and Time: July 5, 2017 at 2:00 p.m. (Eastern Time)**

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*Counsel to Those Certain Post-Closing Accident  
Plaintiffs Represented By Butler Wooten & Peak  
LLP, Denney & Barrett, P.C., Hilliard Muñoz  
Gonzales L.L.P., and Turner & Associates, P.A.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
MOTORS LIQUIDATION COMPANY, et al.,	:
f/k/a General Motors Corp., et al.,	:
	:
Debtors.	:
-----X	

Chapter 11  
Case No.: 09-50026 (MG)  
  
(Jointly Administered)

**(I) RESPONSE OF CERTAIN POST-CLOSING ACCIDENT PLAINTIFFS TO MOTION  
BY GENERAL MOTORS LLC FOR AN EXTENSION OF TIME TO APPEAL THE  
COURT’S “MEMORANDUM OPINION AND ORDER GRANTING IN PART NEW  
GM’S MOTION TO ENFORCE SALE ORDER AGAINST THE PITTERMAN  
PLAINTIFFS AND RESOLVING 2016 THRESHOLD ISSUE TWO: WHETHER NON-  
IGNITION SWITCH PLAINTIFFS ARE BARRED FROM ASSERTING  
INDEPENDENT CLAIMS AGAINST NEW GM,” DATED JUNE 7, 2017 [ECF NO.  
13959], TO THE EXTENT IT IS NOT AN INTERLOCUTORY ORDER; AND  
(II) RESERVATION OF RIGHTS**

Goodwin Procter LLP (“Goodwin”) on behalf of those certain Post-Closing Accident  
Plaintiffs represented by Butler Wooten & Peak LLP, Denney & Barrett, P.C., Hilliard Muñoz  
Gonzales L.L.P., and Turner & Associates, P.A. hereby responds to the *Motion by General  
Motors LLC for an Extension of Time to Appeal the Court’s “Memorandum Opinion and Order  
Granting in Part New GM’s Motion to Enforce Sale Order Against the Pitterman Plaintiffs and*

*Resolving 2016 Threshold Issue Two: Whether Non-Ignition Switch Plaintiffs are Barred from Asserting Independent Claims Against New GM,” Dated June 7, 2017 [ECF No. 13959], to the Extent it is Not an Interlocutory Order* (the “Motion”), as follows:

1. Goodwin represents certain Ignition Switch and Non-Ignition Switch Post-Closing Accident Plaintiffs in connection with the 2016 Threshold Issues.<sup>1</sup>
2. In essence, New GM is asking this Court for an advisory opinion as to how it should proceed on appeal.
3. New GM requested that Goodwin (and, by extension, Goodwin’s clients) share its appellate litigation strategy with New GM or otherwise assist New GM in implementing its own appellate litigation strategy. Goodwin declined to provide its thoughts and mental impressions to New GM.
4. Goodwin’s view would not change the nature of the Court’s June 7, 2016 Memorandum Decision and Order (Dkt. No. 13955), nor will it alter how an appellate court will rule on questions of timeliness and finality in the future.
5. The Ignition Switch and Non-Ignition Switch Post-Closing Accident Plaintiffs represented by Goodwin reserve all rights with respect to the pending Motion and any appeals from rulings made with respect to any of the 2016 Threshold Issues.

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in (1) the Motion, and (2) 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”)*, dated December 13, 2016 [ECF No. 13802] and the Glossary of Terms attached thereto as Exhibit “B.”

Dated: June 28, 2017  
New York, New York

Respectfully submitted,

/s/ William P. Weintraub  
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