

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:
MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a general motors corp., *et al.*,

Debtors.

Chapter 11
Case No. 09-50026 (MG)

(Jointly Administered)

**PLAINTIFFS' AND THE PARTICIPATING UNITHOLDERS' NOTICE OF FILING
AMENDED OBJECTIONS TO GUC TRUST AND NEW GM'S EXHIBIT LIST**

The Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs, and certain Pre-Closing Accident Plaintiffs (collectively, "Plaintiffs") and the Participating Unitholders, hereby give notice of filing their Amended Objections to the GUC Trust and New GM Exhibit List.

Pursuant to the *Pre-Trial Stipulation and Scheduling Order*, dated October 11, 2017 [ECF No. 14130] at ¶ 5, on December 5, 2017, the parties filed the [Proposed] Joint Pre-Trial Order [ECF No. 14183], which attached Exhibit F, Plaintiffs' and the Participating Unitholders' Objections to the GUC Trust and New GM Exhibit List [ECF No. 14183-7].

Attached hereto as Exhibit 1 is Plaintiffs' and the Participating Unitholders' Amended Objections to the GUC Trust and New GM Exhibit List, which is meant to replace the original objections filed with the Pre-Trial Order as Exhibit F [ECF No. 14183-7].

Dated: December 11, 2017
New York, New York

Respectfully submitted,
/s/ Robert C. Hilliard
Robert Hilliard, Esq.
HILLIARD MARTINEZ GONZALES LLP
719 South Shoreline
Corpus Christi, TX 78401
Tel: 361-882-1612
bobh@hmgllawfirm.com

*Counsel to certain Pre-Closing Accident
Plaintiffs*

Edward S. Weisfelner
Howard S. Steel
BROWN RUDNICK LLP
Seven Times Square
New York, New York 10036
Tel: 212-209-4800
eweisfelner@brownrudnick.com
hsteel@brownrudnick.com

Sander L. Esserman
STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA, A
PROFESSIONAL CORPORATION
2323 Bryan Street, Ste. 2200
Dallas, Texas 75201
Tel: 214-969-4900
esserman@sbep-law.com

*Designated Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the Bankruptcy Court*

Steve W. Berman (admitted *pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO
LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Tel: 206-623-7292
steve@hbsslaw.com

Elizabeth J. Cabraser
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111
Tel: 414-956-1000
ecabraser@lchb.com

*Co-Lead Counsel for the Ignition Switch
Plaintiffs and Certain Non-Ignition Switch
Plaintiffs in the MDL Court*

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
Tel: 212-813-8800
wweintraub@goodwinlaw.com
gfox@goodwinlaw.com

*Counsel to Those Certain Pre-Closing
Accident Plaintiffs Represented By Hilliard
Muñoz Gonzales L.L.P. and the Law Offices
of Thomas J. Henry*

Thomas J. Henry, Esq.
THE LAW OFFICES OF THOMAS J.
HENRY
4715 Fredricksburg, Suite 507
San Antonio, TX 78229

*Counsel to Certain Pre-Closing Accident
Plaintiffs*

Lisa M. Norman (admitted *pro hac vice*)
ANDREWS MYERS, P.C.
1885 St. James Place, 15th Floor
Houston, Texas 77056
Tel: 713-850-4200
Lnorman@andrewsmyers.com

*Counsel to Certain Pre-Closing Accident
Plaintiffs*

Daniel H. Golden
Deborah J. Newman
AKIN GUMP STRAUSS
HAUER & FELD LLP

One Bryant Park
New York, NY 10036
Tel: 212-872-1000
dgolden@akingump.com
djnewman@akingump.com

Counsel to Participating Unitholders

EXHIBIT 1

OBJECTIONS to the GUC Trust and New GM Exhibit List (In re Motors Liquidation Co., No. 09-50026)
Submitted on Behalf of the Signatory Plaintiffs and Participating Unit Holders

<u>Ex. No.</u>	<u>Starting Bates #</u>	<u>Ending Bates #</u>	<u>Document Description</u>	<u>Signatory Plaintiffs' and Participating Unit Holders' Objections</u>
DX-A	ELPLNTFF00014245	ELPLNTFF00014248	Engagement-Retention Letter to Class Representative Patricia Barker	
DX-B			Brown Rudnick Engagement Letter to Berman et al	
DX-C	ELPLNTFF00014206	ELPLNTFF00014207	Engagement-Retention Letter to Class Representative Yvonne James-Bivins	
DX-D	AG0000008	AG0000009	Email from Weisfelner to Golden re: GUC Trust	
DX-E	AG0000920	AG0000935	Email from Steel to Moss et al re: GM, with attachments	
DX-F	AG0005147	AG0005184	Email from Moss to Weisfelner et al re: GM, with attachments	
DX-G	AG0000966	AG0001007	Email from Steel to Golden et al re: Motors, with attachments	
DX-H	AG0000134	AG0000134	Email from Golden to Weintraub et al re: GM - GUC Trust Settlement	
DX-I	AG0000012	AG0000012	Email from Weisfelner to Golden et al re: GM	
DX-J	AG0000014	AG0000014	Email from Weintraub to Golden re: GUC Settlement	
DX-K	GUC_0006281	GUC_0006283	Email from Weintraub to Martorana re: GM GUC Trust Settlement	
DX-L	GUC_0004498	GUC_0004503	Email from Weintraub to Moss et al re: GUC Settlement	
DX-M	GP002990	GP002995	Email from Golden to Weintraub et al re: GUC Settlement	
DX-N	GUC_0003887	GUC_0003891	Email from Weintraub to Golden et al re: GUC Settlement	
DX-O	GUC_0013905	GUC_0013910	Email from Spain to Martorana et al re: 6.2(C) Footnotes	
DX-P	GUC_0003736	GUC_0003769	Email from Martorana to Forster et al re: Motors – GUC Settlement, with attachments	
DX-Q	GUC_0003697	GUC_0003698	Email from Martorana to Steel et al re: Motors – GUC Settlement	
DX-R	GUC_0003687	GUC_0003689	Email from Hilliard to Martorana re: settlement discussion	
DX-S	GUC_0003605	GUC_0003676	Email from Martorana to Steel et al re: Motors – GUC Settlement	
DX-T	GUC_0003459	GUC_0003519	Email from Martorana to Weintraub et al re: Motors – GUC Settlement, with attachments	
DX-U	GUC_0002951	GUC_0002955	Email from Weintraub to Martorana et al re: Motors – GUC Settlement	

<u>Ex. No.</u>	<u>Starting Bates #</u>	<u>Ending Bates #</u>	<u>Document Description</u>	<u>Signatory Plaintiffs' and Participating Unit Holders' Objections</u>
DX-V	GUC_0002730	GUC_0002911	Email from Martorana to Steel et al re: Motors – GUC Settlement, with attachments	
DX-W	GUC_0002725	GUC_0002726	Email from Martorana to Steel et al re: GM - settlement status report	
DX-X	GUC_0008633	GUC_0008635	Steel Letter to Court re: Negotiations (Dkt. No. 14027)	
DX-Y	BR000001	BR000009	Email from Martorana to Steel et al re: Motors – GUC Settlement	
DX-Z	GUC_0005846	GUC_0005847	Email from Williams to Steel et al re: GM noticing costs	
DX-AA	GUC_0001904	GUC_0001927	Email from Weisfelner to Weintraub et al re: Motors – GUC Settlement	
DX-BB	GUC_0001817	GUC_0001837	Email from Moss to Cabraser et al re: Motors – GUC Settlement	
DX-CC	GUC_0001792	GUC_0001816	Email from Hilliard to Berman et al re: Motors – GUC Settlement	
DX-DD	GUC_0001558	GUC_0001791	Email from Steel to Martorana et al re: Motors – GUC Settlement, with attachments	
DX-EE	HM003928	HM003928	Email from Hilliard to Spector, with attachments	
DX-FF	GUC_0001446	GUC_0001453	Email from Weintraub to Steel et al re: Motors - GUC Settlement	
DX-GG	GUC_0010567	GUC_0010620	GUC Trust Form 10-Q for quarter ending 6/30/17	
DX-HH	GUC_0001341	GUC_0001350	Email from Martorana to Steel et al re: Motors – GUC Settlement	
DX-II	GUC_0005638	GUC_0005642	Email from Steel to Martorana re: Motors – GUC Trust Settlement Agreement	
DX-JJ	GUC_0005651	GUC_0005651	Email from Golden to Steinberg et al re: GM	
DX-KK	GUC_0001096	GUC_0001097	Email from Martorana to Steel et al re: Motors – GUC Settlement	
DX-LL	GUC_0001062	GUC_0001065	Email from Steel to Golden et al re: Motors – GUC Trust Settlement Agreement	
DX-MM	AG0006847	AG0006850	Email from Williams to Golden et al re: Arthur called [kinda urgent]	
DX-NN	GUC_0005647	GUC_0005650	Email from Steel to Martorana re: Motors – GUC Trust Settlement Agreement	
DX-OO	BR006032	BR006033	Email from Gillett to Steel re: GM	
DX-PP	GUC_0000905	GUC_0000908	Email from Williams to Steel et al	
DX-QQ	GUC_0000904	GUC_0000904	Email from Williams to Steel et al	
DX-RR	HM003907	HM003911	Email from Hilliard to Boudette re: Sole and absolute, with attachments	

<u>Ex. No.</u>	<u>Starting Bates #</u>	<u>Ending Bates #</u>	<u>Document Description</u>	<u>Signatory Plaintiffs' and Participating Unit Holders' Objections</u>
DX-SS	GUC_0000898	GUC_0000899	Email from Williams to Steel et al	
DX-TT	GUC_0000888	GUC_0000890	Email from Williams to Steel et al	
DX-UU	GUC_0005630	GUC_0005630	Email from Steel to Moss et al re: Motors	
DX-VV	HM003912	HM003915	Email from Boudette to Hilliard re: Sole and absolute	
DX-WW	GUC_0010439	GUC_0010441	Email from Golden to Williams re: GM Letter Executed	
DX-XX	GUC_0000881	GUC_0000882	Email from Weisfelner to Martorana et al re: Call Today	
DX-YY	HM003905	HM003906	Email from Hilliard to Vlastic et al	
DX-ZZ	HM003922	HM003923	Email from Vlastic to Hilliard	
DX-AAA	HM004734	HM004737	Email from Hilliard to Vlastic re: Letter to Judge Glenn	
DX-BBB	AG0005441	AG0005441	Email from Moss to Weisfelner et al re: GM, with attachments	
DX-CCC	AG0005101	AG0005101	Email from Pickering to Vanaskey re: MTLQU	
DX-DDD	AG0000114	AG0000116	Email from Williams to Golden	
DX-EEE	AG0003123	AG0003123	Email from Seery to Moss re: GM	
DX-FFF	GP000001	GP000003	Email from Steel to Martorana et al re: Motors, with attachments	
DX-GGG			August 17, 2017 Hearing Transcript	
DX-HHH			Weisfelner declaration in support of motion to enforce settlement, with exhibits (Dkt. No. 14093)	
DX-III			Motion to Enforce the Settlement Agreement By and Among the Signatory Plaintiffs and the GUC Trust (Dkt. No.14092)	
DX-JJJ			Economic Loss/Brown Rudnick Plaintiffs' Responses and Objections to Interrogatories	
DX-KKK			Economic Loss/Brown Rudnick Plaintiffs' Responses and Objections to RFAs	
DX-LLL			HMG Claimants' Responses and Objections to RFAs	
DX-MMM			Norman Plaintiffs' Responses and Objections to RFAs	
DX-NNN			Norman Plaintiffs' Responses and Objections to Interrogatories	
DX-OOO			October 3, 2017 Hearing Transcript	
DX-PPP			Economic Loss/Brown Rudnick Plaintiffs' Supplemental Responses and Objections to Interrogatories	

<u>Ex. No.</u>	<u>Starting Bates #</u>	<u>Ending Bates #</u>	<u>Document Description</u>	<u>Signatory Plaintiffs' and Participating Unit Holders' Objections</u>
DX-QQQ			HMG Claimants' Supplemental Responses and Objections to Interrogatories	
DX-RRR			Norman Plaintiffs' Supplemental Responses and Objections to Interrogatories	
DX-SSS			Joinder of the Participating Unitholders in the Motion to Enforce (Dkt. No. 14153)	
DX-TTT	GUC_0010988	GUC_0011028	Email from Steel to Weisfelner et al re: Motors	
DX-UUU	AG0001041	AG0001082	Email from Steel to Martorana et al re: Motors	
DX-VVV	AG0002102	AG0002241	Email from Steel to Moss re: Motors	
DX-WWW	GUC_0003680	GUC_0003682	Email from Steel to Martorana et al re: Motors	
DX-XXX			August 11, 2017 Conference Transcript	
DX-YYY	GUC_0006799	GUC_0007004	Email from Steel to Weintraub et al re: Motors - GUC Trust Settlement Agreement	
DX-ZZZ	GUC_0013946	GUC_0013949	Email from Williams to Golden et al	
DX-AAAA			HMG Claimants' Responses and Objections to Interrogatories	
DX-BBBB	GUC_0003777	GUC_0003823	Email from Martorana to Weintraub et al re: GUC Settlement, with attachments	
DX-CCCC			Golden Declaration in Support of Joinder of the Participating Unitholders in the Motion to Enforce (Dkt. No. 14154)	
DX-DDDD	GUC_0000001	GUC_0000041	Email from Martorana to Steel et al re: Motors	
DX-EEEE			Proposed Ignition Switch Class Claim, Ex. A (Dkt. No. 13086-2)	
DX-FFFF			Proposed Non-Ignition Switch Class Claim, Ex. B (Dkt. No. 13806-3)	
DX-GGGG			Norman Plaintiffs' Motion for Authority to File Late Proofs of Claim	
DX-HHHH			Norman Plaintiffs' First Supplement to Motion for Authority to File Late Proofs of Claim	
DX-IIII			Norman Plaintiffs' Second Supplement to Motion for Authority to File Late Proofs of Claim	
DX-JJJJ	GUC_0006767	GUC_0006770	Email from Steel to Williams	
DX-KKKK			Letter from Golden to Judge Glenn re: Settlement (Dkt. No. 14063)	
DX-LLLL	GUC_0013900	GUC_0013900	Email from Tennenbaum to Vanaskey et al re MTLQU Ignition Switch Settlement	
DX-MMMM	BR000367	BR000368	Email from Martorana to Weintraub et al re GUC Settlement	
DX-NNNN	BR000507	BR000514	Email from Weintraub to Martorana et al re: GUC Settlement	

<u>Ex. No.</u>	<u>Starting Bates #</u>	<u>Ending Bates #</u>	<u>Document Description</u>	<u>Signatory Plaintiffs' and Participating Unit Holders' Objections</u>
DX-O000			Deposition Transcript of Beth Andrews	Hearsay (801, 802).
DX-PPPP			Deposition Transcript of Daniel Golden	Hearsay (801, 802).
DX-QQQQ			Deposition Transcript of Edward Weisfelner	Hearsay (801, 802).
DX-RRRR			Deposition Transcript of Howard Steel	Hearsay (801, 802).
DX-SSSS			Deposition Transcript of James Barton	Hearsay (801, 802).
DX-TTTT			Deposition Transcript of Keith Martorana	Hearsay (801, 802).
DX-UUUU			Deposition Transcript of Melanie Mosley	Hearsay (801, 802).
DX-VVVV			Deposition Transcript of William Weintraub	Hearsay (801, 802).
DX- WWWW	GUC_0002229	GUC_0002484	Email from Martorana to Steel et al re: Motors - GUC Settlement, with attachments	
DX-XXXX			Deposition Transcript of Matthew Williams, Vol. I	Hearsay (801, 802).
DX-YYYY	GUC_0002485	GUC_0002724	Email from Steel to Martorana et al re: Motors – GUC Settlement, with attachments	
DX-ZZZZ			Deposition Transcript of Matthew Williams, Vol. II	Hearsay (801, 802).
DX-AAAAA	GUC_0003520	GUC_0003589	Email from Martorana to Weintraub et al re: Motors - GUC Settlement, with attachments	
DX-BBBBB	GUC_0003677	GUC_0003679	Email from Martorana to Steel et al re: Motors - GUC Settlement	
DX-CCCC	GUC_0003942	GUC_0003986	Email from Weintraub to Martorana et al re: GUC Settlement, with attachments	
DX-DDDDD	GUC_0006456	GUC_0006501	Email from Martorana to Weintraub et al re: GUC Settlement, with attachments	
DX-EEEE	GUC_0010022	GUC_0010062	Email from Martorana to Weintraub et al re: GUC Settlement, with attachments	
DX-FFFF	GUC_0010811	GUC_0010883	Motors Liquidation Company GUC Trust Form 10-K	
DX- GGGG	GUC_0010946	GUC_0010982	Email from Martorana to Steel et al re: Motors	
DX-HHHHH	GUC_0013102	GUC_0013103	Email from Martorana to Vanaskey et al re: GM/Late Claims - Potential Settlement	
DX-IIIII			Hilliard Martinez Gonzalez et al's Memorandum of Law in Support of Motion to Withdraw as Counsel in In re: General Motors LLC Ignition Switch Litigation, Case No. 14-md-02543 (Dkt. No. 4713)	
DX-JJJJJ			Hilliard's Declaration in Support of Motion to Withdraw as Counsel in In re: General Motors LLC Ignition Switch Litigation, Case No. 14-md-02543 (Dkt. No. 4714)	
DX-KKKKK			Hilliard Martinez Gonzalez et al's Motion to Withdraw as Counsel in In re: General Motors LLC Ignition Switch	

<u>Ex. No.</u>	<u>Starting Bates #</u>	<u>Ending Bates #</u>	<u>Document Description</u>	<u>Signatory Plaintiffs' and Participating Unit Holders' Objections</u>
			Litigation, Case No. 14-md-02543 (Dkt. No. 4716)	
DX-LLLLL			Order re Hilliard Motion to Withdraw in In re: General Motors LLC Ignition Switch Litigation, Case No. 15-cv-06578 (Dkt. No. 128)	
DX-MMMMM	GUC_0010437	GUC_0010437	Email from Gillett to Steinberg re: settlement	
DX-NNNNN			Errata Sheet for Deposition of Golden	Hearsay (801, 802).
DX-OOOOO			Errata Sheet for Deposition of Andrews	Hearsay (801, 802); not proper errata material.
DX-PPPPP			Letter from Steinberg to Judge Glenn re: Update on Matters Related to the Late Claims Motions and the Chambers Conference Scheduled for August 17, 2017 at 3:00 p.m.	