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March 26, 2018

VIA EMAIL AND ECF FILING

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

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

Dear Judge Glenn:

We write on behalf of the Ignition Switch Plaintiffs, certain Non-Ignition Switch Plaintiffs (collectively, the "**Economic Loss Plaintiffs**"), and certain Ignition Switch Pre-Closing Accident Plaintiffs (collectively with the Economic Loss Plaintiffs, the "**Plaintiffs**"), to provide the Court with an update on the status of the settlement discussions among counsel for the Plaintiffs, the Participating Unitholders and the GUC Trust (collectively, the "**Negotiating Parties**"), and to request that the Court (i) set the deadline for a further update for April 25, 2018; and (ii) hold the Late Claims Motions in abeyance until that time.

Counsel for the Negotiating Parties are making substantial progress toward resurrecting a settlement agreement that, if successful, would obviate the need to litigate the Late Claims Motions. To that end, since last appearing before Your Honor, the Negotiating Parties have engaged in several in-person meetings and other communications to discuss the potential settlement, the related suite of settlement documentation and moving papers, and the rationale and evidence supporting the settlement's approval. The Plaintiffs are optimistic that these discussions will culminate in the execution of a settlement agreement and the filing of a motion seeking the Court's approval of that settlement agreement in the near term.

Given three particular developments that will or are likely to occur over the next few weeks, however, the Negotiating Parties will be significantly better positioned to provide the Court with a more definitive timetable on the status of settlement negotiations by April 25, 2018. First, the Economic Loss Plaintiffs' experts are producing additional reports on or before April 20, 2018, which will be made available to counsel for the GUC Trust and counsel for the Participating Unitholders. Second, within the next two weeks, the Economic Loss Plaintiffs and the Ignition Switch Pre-Closing Accident Plaintiffs represented by Andrews Myers, PC (the "**AM Plaintiffs**")

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expect to file with the Court amended proofs of claim as supplemental exhibits to their motions to file late proofs of claims. The amended proofs of claim to be filed by the Economic Loss Plaintiffs will add additional claimants, and citations to the consumer protection and U.C.C. statutes of the states where the movants and similarly-situated creditors are domiciled, and the amended proofs of claim to be filed by the Ignition Switch Pre-Closing Accident Plaintiffs will be supplemented with additional documents in support of the claims. Third, at a MDL conference held on March 22, 2018, Judge Furman announced that he is likely to rule on the summary judgment briefing addressing the question of whether the Economic Loss Plaintiffs may be entitled to benefit of the bargain damages that is currently before him by April 17, 2018.

Each of these events may well inform the Negotiating Parties' positions regarding the potential settlement. Thus, we respectfully request that April 25, 2018 be set as the deadline for the Negotiating Parties to provide the Court with a further update, so that the parties may review the Economic Loss Plaintiffs' updated expert reports, the Economic Loss Plaintiffs' and AM Plaintiffs' amended proofs of claim, and any decision that Judge Furman may issue prior to that date, and digest any implications that each may have on the potential settlement. We understand that the GUC Trust and the Participating Unitholders are supportive of this request.

We are available at the Court's convenience should Your Honor wish to further discuss this matter.

Respectfully submitted,

/s/ Edward S. Weisfelner

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cc: Counsel of Record via CM/ECF

The deadline for the Parties to provide the Court with a further update regarding the potential settlement shall be 5 p.m., April 25, 2018.

IT IS SO ORDERED.

DATED: MARCH 27, 2018

/s/ MARTIN GLENN

UNITED STATES BANKRUPTCY JUDGE