

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

*Counsel for Pre-Closing  
 Accident Plaintiffs Represented by  
 Hilliard Martinez Gonzales L.L.P. and  
 Thomas J. Henry Injury Attorneys*

UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK

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

**NOTICE OF WITHDRAWAL AS COUNSEL OF RECORD  
 FOR CERTAIN MOVANTS UNDER OMNIBUS MOTIONS BY CERTAIN  
 PRE-CLOSING ACCIDENT PLAINTIFFS FOR AUTHORITY TO  
 FILE LATE PROOFS OF CLAIM FOR PERSONAL INJURIES  
AND WRONGFUL DEATHS [DOCKET NOS. 13807 AND 14325]**

**WHEREAS**, Goodwin Procter, LLP (“**Goodwin**”) represents the law firms of Hilliard Martinez Gonzales L.L.P. (“**HMG**”) and Thomas J. Henry Injury Attorneys (“**TJHIA**”) in connection with their representation of claimants asserting personal injury and wrongful death claims against the debtors in the above-captioned chapter 11 cases (“**Old GM**”) and General Motors LLC (“**New GM**”).

**WHEREAS**, on December 22, 2016, Goodwin filed that certain *Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* [Docket No. 13807] (the “**Late Claims Motion**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Late Claims Motion (the “**Late Claims Movants**”). Attached as Exhibit B to the Late Claims Motion were copies of each Late Claims Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

**WHEREAS**, on May 25, 2018, Goodwin filed that certain *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* [Docket No. 14325] (the “**Supplemental Late Claims Motion**”) and, together with the Late Claims Motion, the “**Late Claims Motions**”) on behalf of those certain HMG and TJHIA clients listed on Exhibit A to the Supplemental Late Claims Motion (the “**Supplemental Late Claims Movants**”) and, collectively with the clients listed on Exhibit A to the Late Claims Motion, the “**Late Claims Movants**”). Attached as Exhibit B to the Supplemental Late Claims Motion were copies of each Supplemental Late Claims Movant’s proposed proof of claim against Old GM’s chapter 11 estate.

**WHEREAS**, on December 4, 2017, Goodwin filed a *Notice of Withdrawal as Counsel of Record for Certain Movants Under Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths [Docket No. 13807] [Docket No. 14179]*, pursuant to which Goodwin withdrew as counsel to certain Movants that were no longer clients of HMG and TJHIA pursuant to Order No. 137 entered in the multi-district litigation pending before the Honorable Jesse M. Furman of the United States District Court for the Southern District of New York, *In re General Motors LLC Ignition Switch Litigation*, MDL No. 2543 (JMF) (S.D.N.Y.) (the “**MDL**”) [MDL Docket No. 4840]. Notice was given to each such former client to retain new counsel or to proceed *pro se* as to the Late Claims Motion or Supplemental Late Claims Motion (as applicable) because neither Goodwin, HMG, nor TJHIA would be prosecuting either of such motions on their behalf.

**WHEREAS**, on April 25, 2018, Goodwin filed a *Second Notice of Withdrawal as Counsel of Record for Certain Movants Under Omnibus Motion By Certain Ignition Switch Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths [Docket No. 13807] [Docket No. 14282]*, pursuant to which Goodwin withdrew as counsel to certain additional Late Claims Movants that were no longer clients of HMG and TJHIA in the MDL. Notice was given to each such former client to retain new counsel or to proceed *pro se* as to the Late Claims Motion or Supplemental Late Claims Motion (as applicable) because neither Goodwin, HMG, nor TJHIA would be prosecuting either of such motions on their behalf. The Late Claims Movants for whom Goodwin previously withdrew as counsel are identified on Exhibit B hereto (collectively, the “**Previously Withdrawn Late Claims Movants**”).

**WHEREAS**, most of the Late Claims Movants whom HMG and TJHIA represent in the MDL have reached a settlement with New GM pursuant to which, *inter alia*, these settling plaintiffs have agreed to withdraw their proofs of claim from the Motions. The Late Claims Movants who have reached settlements with New GM are identified on Exhibit C hereto (collectively, the “**Settling Plaintiffs**”).

**WHEREAS**, five of the Late Claims Movants, each identified on Exhibit A hereto (the “**Affected Movants**”), have not agreed to settle their claims against New GM or withdraw their Late Claims Motion or Supplemental Late Claims Motion (as applicable) seeking allowance of their proofs of claim against Old GM’s chapter 11 estates.

**WHEREAS**, HMG and TJHIA filed a formal motion to withdraw in the MDL for one of the Affected Movants (Nicole Jaure), which motion the MDL court granted on June 13, 2018 [MDL Docket No. 5685].

**WHEREAS**, on November 11, 2019, HMG and TJHIA notified Affected Movant Tammie Marshall, of the withdrawal of those firms as her counsel. HMG and TJHIA did not file a motion to withdraw in the MDL because Ms. Marshall did not have a complaint or claims pending in the MDL.

**WHEREAS**, on December 6, 2019, HMG and TJHIA filed a formal motion to withdraw in the MDL for three of the Affected Movants (Lynda Duncan, Christopher Gracia, and Diedra Shipman) [MDL Docket Nos. 7575, 7576 and 7578].

**NOW THEREFORE, PLEASE TAKE NOTICE THAT**, pursuant to Rule 2090-1(f) of the Local Bankruptcy Rules for the Southern District of New York, Goodwin withdraws as counsel of record for the Affected Movants in these chapter 11 cases and will not be prosecuting

the Late Claims Motion or Supplemental Late Claims Motion (as applicable) on behalf of the Affected Movants.

**PLEASE TAKE FURTHER NOTICE THAT**, the Settling Plaintiffs hereby affirmatively withdraw their proofs of claim from the Late Claims Motion or Supplemental Late Claims Motion (as applicable).

**PLEASE TAKE FURTHER NOTICE THAT**, due to the settlement among the Settling Plaintiffs and New GM, Goodwin will not be prosecuting either of the Late Claims Motion or the Supplemental Late Claims Motion on behalf of any of the Late Claims Movants (including the Affected Movants, the Previously Withdrawn Late Claims Movants and the Settling Plaintiffs).

**PLEASE TAKE FURTHER NOTICE THAT**, HMG and TJHIA will provide the Affected Movants and the Previously Withdrawn Late Claims Movants with a copy of this notice in order to give them an opportunity to find replacement counsel to prosecute the Late Claims Motion or Supplemental Late Claims Motion (as applicable), to act *pro se*, or to otherwise pursue authority to file a late proof of claim in these chapter 11 cases.

Dated: December 9, 2019

Respectfully submitted,

/s/ William P. Weintraub  
William P. Weintraub  
Gregory W. Fox  
GOODWIN PROCTER LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
Tel.: 212.813.8800  
Fax: 212.355.3333  
wweintraub@goodwinlaw.com  
gfox@goodwinlaw.com

*Counsel for Pre-Closing  
Accident Plaintiffs Represented by*

*Hilliard Martinez Gonzales L.L.P. and  
Thomas J. Henry Injury Attorneys*

**EXHIBIT A – AFFECTED MOVANTS**

1. Lynda Duncan (Supplemental Late Claims Movant)
2. Christopher Gracia (Deceased) (Supplemental Late Claims Movant)
3. Nicole Jaure (Supplemental Late Claims Movant)
4. Tammie Marshall (Supplemental Late Claims Movant)
5. Deidra Shipman (Late Claims Movant)

**EXHIBIT B – PREVIOUSLY WITHDRAWN MOVANTS**

1. Allen, Lisa
2. Berard, Brandy
3. Bueno, John
4. Bueno, Lisa
5. Burns, Angela
6. Burns, Elizabeth Faye
7. Davis, Veronica Lynn
8. Duckett, Raymond
9. Ferrell, Tabatha
10. Garza, Rosy E
11. Gibbs, Santoria
12. Gibson, Mary
13. Gill, April
14. Hairston, John T
15. Harris, Charlesa
16. Hartnett, Carolyn individually and as representative of the Estate for Sara Hartnett
17. Haseleu, Tanya individually and as representative of the Estate for Tiffany Lee Haseleu
18. Haseleu, Todd individually and as representative of the Estate for Tiffany Lee Haseleu
19. Higgins, Sherell individually and as next friend of Darrell Brown Jr. and as representative of the Estate of Dameasha Brown
20. Honeycutt, Sammeeka
21. Hueber, Jamie
22. Jackman, Kenneth individually and as representative of the Estate for Jessica Jackman
23. Jackman, Patricia individually and as representative of the Estate for Jessica Jackman
24. Langley, Kim individually and as representative of the Estate for Richard Bailey
25. Langley, Nick individually and as representative of the Estate for Richard Bailey
26. Lindsay, Kenneth individually and as representative of the Estate of Rita Carol Lindsay
27. Lockhart, Marjorie
28. Lopez, Kimberly
29. Maclin, Justin
30. Moindi, Wycliffe
31. Moza, Joell individually and as representative of the Estate for Loretta Moza
32. Moza, Julie individually and as representative of the Estate for Loretta Moza
33. Moza, Richard individually and as representative of the Estate for Loretta Moza
34. Myra Washington a/k/a Minerva Peterson individually and as representative of the Estate for Myra Washington
35. Peoples, Earlesha
36. Peterson, Ranae
37. Platzke, Joell
38. Pylar, Shirley
39. Reetz, Janet individually and as representative of the Estate for Loretta Moza
40. Rooney, Richard



41. Shells, Willie
42. Snyder, Anthony
43. Stanley, Glenn
44. Stivers, Brandon
45. Surbeck, Kally
46. Torres, Aleni
47. Torres, Daniel
48. Vargas, Chelsea Dirks
49. Venable, Houston
50. Waithe, Dwayne
51. Wallace, Carla individually and as representative of the Estate for Cory Wallace
52. West, Linda individually and as representative of the Estate for Tracy West
53. Willis-Singh, Tanya
54. Wright, Jacqueline

**EXHIBIT C – SETTling PLAINTIFFS**

1. Adams, Ernest individually and as representative of the Estate for Elizabeth Williams
2. Albert, Christine a/k/a Boutilier, Christine
3. Amsdill, Scott
4. Anderson, Vangie
5. Atkinson, Horace individually and as representative of the Estate for Tammeye Jan Atkinson
6. Bannarn, Dennis
7. Barkwell, Linda individually and as representative of the Estate for Randall Forrester
8. Barner, Jasmine
9. Barrett, Lowary
10. Baylor, Sandra D individually and as next friend of Kyle Wojciechowski
11. Bennett, Keith
12. Bennett, Walter Kevin
13. Bonito, Kathleen
14. Bowers, Johnnie
15. Bowyer, Alicia a/k/a Stewart, Alicia
16. Boyd, David
17. Braxton, Linda
18. Bremenkamp, Sandra
19. Brooks Jr., Joseph
20. Brooks, Rose
21. Brown, Cathalina
22. Brown, Melinda individually and as representative of the Estate for Brenda Inman
23. Buckley, Amanda
24. Buie, Darell
25. Cady, Jeanine individually and as representative of the Estate for Sandy Cady
26. Caldwell, Connell
27. Cardell, Kateasha
28. Casey, Isaac
29. Chandler, Dessie
30. Chapman, Edgar
31. Charles, Hans
32. Collins, Donna individually as next friend of Billy V. Collins
33. Crew, Richard
34. Cunningham, Eric
35. Cuthbertson, Ruth
36. Deforest, Gayla
37. Delhommer, Michelle individually and as next friend of Justin Kyle and Justice Delhommer
38. Delk, Brittany
39. Delk, Grant
40. Delk, Sherille
41. Delk, Sherille individually and as next friend of Timothy Delk

42. Delk, Valeria
43. Deming, Michael
44. Doinidis Jr., Peter
45. Dunbar, Alternetta
46. Dunson, Jamie
47. Dyer, Alan individually and as representative of the Estate for Emma R Dyer
48. Dyer, Margaret individually and as representative of the Estate for Emma R Dyer
49. Edmonson, Kesha
50. Edwards, Shiza
51. Elias, Abraham
52. Elias, Diane individually and as the representative of the Estate of Dolores  
Zatwarnicki
53. Elias, Michael
54. Fair, Kristi
55. Ferruolo, Edward individually and as representative of the Estate for Evelyn Ferruolo
56. Fish, Robert
57. Fleming, Jessica
58. Gaston Jr, Darryl R
59. Ghesquiere, Dan
60. Gibbs, Sandra
61. Gillespie, Robert
62. Goad, Lisa individually and as representative of the Estate for Justin Wayne Goad
63. Gomez, Tiffany
64. Gonzales, Simon
65. Gordon, Catherine
66. Greene, Crystal
67. Grooms, Stephanie
68. Gross, Kevin D.
69. Groves, Michelle
70. Haislah, Robert
71. Hamilton, Donnie
72. Harmon, Paul individually and as representative of the Estate for Anthony Harmon
73. Hawes, Wade individually and as representative of the Estate for Amy Hawes
74. Hemminger, Deana
75. Hicks, Jennie individually and as representative of the Estate for Alphonso Hicks
76. Hill, Roderick
77. Howard, Tanya
78. Hubbard, Wesley
79. Hughes, Melody
80. Hultgren, Erik
81. Ira, Sage a/k/a Carter, Nicole
82. Jackson, Mary
83. James, Gwendolyn
84. Jennings, Robert
85. Johansen, Michael
86. Johndro, Jason

87. Johnson, Kara
88. Johnson, Margaret individually and as next friend of Bryan Johnson and individually and as representative of the Estate for Robert Brian Johnson
89. Jones, Volanda
90. Kage, Gloria
91. Kalilou, Rasheda
92. Kavanaugh, Michael individually and as representative of the Estate for Norman Kavanaugh
93. Keller, William F.
94. Kersey, Patricia individually and as representative of the Estate for Carl Beale
95. Knight, Michael
96. Korona, Richard
97. Kunc, Linda
98. Laird, Andrea
99. Latimer, James
100. Leblanc, Nachel
101. LeDay, Gilbert
102. Leonard, Janeshea
103. Lesesne, Cheryl
104. Lester, Shirley
105. Lett, Tony Sr. individually and as representative of the Estate for Tony Lett, Jr.
106. Lissner, Kevin
107. Loree, Jenna
108. Love, Mark
109. Love, Teeynesha
110. Lueth, Kon
111. Lynch, Patricia
112. Maloney, Margaret
113. McCloud, Patricia
114. McGhee, Sharon
115. McPherson, Randall individually and as representative of the Estate of Tina Elizabeth McPherson
116. Mency, Eileen
117. Mosley, Melanie individually and as representative of the Estate for Anthony Harmon
118. Myers, Edson
119. Myles, Yvette
120. Noffke, Robert A.
121. O'Shields, Mary individually and as representative of the Estate for Brenda Inman
122. Owens, Janice
123. Page, Ashley
124. Page, Sammie individually and as representative of the Estate for Nakeshia Page
125. Pearce, Kenneth
126. Powell, Martinique
127. Powell, Ryan
128. Powell, Sharon

129. Powledge Colvin, Amber individually and as representative of the Estate for Adam Powledge
130. Powledge, Austin individually and as representative of the Estate for Adam Powledge
131. Powledge, Mary individually and as representative of the Estate for Adam Powledge
132. Powledge, Ronnie individually and as representative of the Estate for Adam Powledge
133. Prados, Katherine
134. Prewitt, Vernice
135. Pruitt, Jami individually and as representative of the Estate for David James Slezak
136. Purdy, Anna
137. Quintanilla, Jose individually and as representative of the Estate for Joe Quintanilla
138. Quintanilla, Rosalita individually and as representative of the Estate for Joe Quintanilla
139. Ramadi, Muntaha
140. Ramsey, Joyce
141. Raniolo, Samuel individually and as representative of the Estate for Christian Raniolo
142. Robbins, Justin
143. Robinson, Miranda individually and as representative of the Estate for Tina Elizabeth McPherson
144. Rodgers, Dailene
145. Rodriguez, Rafael
146. Rogers, Dennis individually and as representative of the Estate for Sarah Rogers
147. Rogers, Timothy
148. Roura, Samara
149. Ruppert, Amy
150. Russell, Chikoa
151. Santiago, Carla
152. Scott, Randy
153. Scroggins, Deborah
154. Secord, Marilyn
155. Shinko, Patricia
156. Short-Coleman, Yolanda
157. Sims, Derrius
158. Sims, Rodney
159. Small, Clara
160. Small, Kenneth
161. Smith, George E.
162. Sorrells, Rickey
163. Sowers, Adam
164. Spencer, Christina
165. Spiller, Carol
166. Stanley, Deborah
167. Stevens, Cheryl
168. Strauss, Alaina
169. Surbeck, Kally<sup>1</sup>

---

<sup>1</sup> Ms. Surbeck previously withdrew her proof of claim from the Motion. *See* Docket No. 14282 at 3 n.1.

170. Swafford, Marshall individually and as representative of the Estate for Corey Swafford
171. Sykes, Johnnie
172. Taylor, Kenya
173. Thomison, Teresa
174. Vasquez, Hilda
175. Walker, Erica individually and as representative of the Estate for Kenneth Juan Walker
176. Walker, Tionnte
177. Warren, Isaac individually and as representative of the Estate for Melissa Warren
178. Washington, Ricky
179. Watkins, Diana
180. Weston, Rhonda
181. White, Virginia
182. Wiley, Ashley a/k/a Good, Ashley
183. Wilkinson, Herbert individually and as representative of the Estate for Jimmy Wilkinson
184. Williams, Alexander
185. Wilson, Johnny
186. Wright, Vernessa
187. Zamora, George