

**Hearing Date and Time: TBD**

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Pre-Closing Plaintiffs*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:  
MOTORS LIQUIDATIONS COMPANY, et al.  
f/k/a General Motors Corp., et al.

Debtors.

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

(Jointly Administered)

**SUPPLEMENT TO 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 DEATHS**

Those certain Additional Ignition Switch Pre-Closing Accident Plaintiffs<sup>1</sup> identified herein, by and through the undersigned counsel, hereby file this Supplement to the Brief in Support [Doc. 14690] of the Motion to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths (“Motion”) and supplements thereto [ECF Nos. 14018, 14046, 14112, 14195 and 14346], and in support thereof, respectfully state as follows:

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<sup>1</sup> The “Additional Ignition Switch Pre-Closing Accident Plaintiffs”, identified in Doc. 14018, 14046, 14112, 14195 and 14346, were not included in the Omnibus Motion filed by Certain Ignition Switch Pre-Closing [Docket No. 13807] but are seeking the same relief set forth in the motion at Docket No. 13807, which was still pending and for which oral arguments had not yet occurred when these “Additional Ignition Switch Pre-Closing Accident Plaintiffs” filed their late claims motion, and supplements thereto. These “Additional Ignition Switch Pre-Closing Accident Plaintiffs” are included in the subset of the Pre-Closing Accident Plaintiffs that had the Ignition Switch in their Subject Vehicles, but did not receive notice of the filing of Docket No. 13807 or the deadline to join in that motion.

1. In addition to the twelve (12) Additional Ignition Switch Pre-Closing Accident Plaintiffs who continue to seek authority to file late claims and filed a brief in support of their pending motion, eight (8) additional plaintiffs who are part of the original 389 movants also desire to continue pursuing their rights to assert late claims to the extent allowed by this Court. These eight (8) Ignition Switch Pre-Closing Accident Plaintiffs, whose claims continue to remain pending before this Court and who join in the arguments set forth in the brief at Docket 14690, are identified as follows:

Jared Bednar,  
Ryan Dullen,  
Sheryl El-Cheikh,  
Michael Gillis,  
Shanga Johnson,  
Deborah Overcast,  
Jibreel Riley, and  
Kenneth Salm

WHEREFORE, Movants respectfully request that this Court enter an Order granting them leave to file their proposed late claims.

Dated: April 20, 2020

Respectfully submitted,

ANDREWS MYERS, P.C.

/s/ Lisa M. Norman

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), copies will also be served by email on April 20, 2020 on those parties listed as “Notice Parties” under the Court’s December 12, 2016 Order to Show Cause [ECF No. 13802], with paper copies served by first class mail postage prepaid on all Notice Parties for whom email addresses are unavailable.

/s/ Lisa M. Norman  
LISA M. NORMAN