



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 20, 2020

**By ECF and Email**

Hon. Martin Glenn  
United States Bankruptcy Court  
One Bowling Green  
New York, New York 10004

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street  
New York, NY 10007

Re: *In re: Motors Liquidation Co.*, No. 09-B-50026 (MG);  
*In re General Motors LLC Ignition Switch Litig.*, 14-MD-2543 (JMF)

Dear Judges Glenn and Furman:

I represent the United States Department of the Treasury (“**Treasury**”). Treasury and Export Development Canada (“**EDC**”), are debtor-in-possession lenders to the MLC bankruptcy estate. On April 20th, the DIP Lenders filed a short joinder (ECF No. 14714 in case 09-B-50026) to an objection (ECF No. 14691) that the MLC Avoidance Action Trust filed to a settlement approval motion filed by the MLC GUC Trust. I write respectfully in light of the order entered by Judge Furman in the above-referenced MDL proceedings (ECF No. 7845) and by Judge Glenn in the MLC bankruptcy case limiting live telephonic participation in the joint hearing scheduled for April 23, 2020 at 9:30 a.m., to specified parties absent further order of the Court. I hereby respectfully request that both EDC counsel, Michael Schein, and I be afforded a “live” telephonic appearance. We do not anticipate affirmatively arguing at any length, but wish to be able to respond to questions and/or to comment if the parties’ contentions during argument require response by the DIP Lenders.

Thank you for your consideration of this request.

Respectfully,

GEOFFREY S. BERMAN  
United States Attorney

By: s/ David S. Jones  
DAVID S. JONES  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (212) 637-2739  
Facsimile: (212) 637-2730  
Email: [David.Jones6@usdoj.gov](mailto:David.Jones6@usdoj.gov)

cc by ECF to counsel for all parties in 09-B-50026 and email to parties on the 9019 motion