

Exhibit 15:

Notice Pursuant to the Class Action Fairness Act, 28 U.S.C. §1715

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

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March __, 2020

VIA FIRST CLASS CERTIFIED MAIL

To: All “Appropriate” Federal and State Officials Per 28 U.S.C. § 1715
(see attached Service List)

Re: Notice of Proposed Class Action Settlement

In re: General Motors LLC Ignition Switch Litigation, 14-MD-2543 (S.D.N.Y.) (JMF)

In re: Motors Liquidation Company, et al., f/k/a/ General Motors Corp., et al., 09-50026
(Bankr. S.D.N.Y.) (MG)

Ladies and Gentlemen:

We write on behalf of General Motors LLC (“New GM”) in the Multidistrict Litigation (“MDL”) matter of *In re: General Motors LLC Ignition Switch Litigation*, 14-MD-2543 (JMF), pending in the United States District Court for the Southern District of New York before the Honorable Jesse M. Furman, and the Motors Liquidation Company General Unsecured Creditors Trust (“the GUC Trust”) in the matter of *In re: Motors Liquidation Company, et al., f/k/a/ General Motors Corp., et al.*, 09-50026 (MG), pending in the Bankruptcy Court for the Southern District of New York (“Bankruptcy Court”) before the Honorable Martin Glenn.

In compliance with the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 (“CAFA”), New GM and the GUC Trust hereby serve upon you notice that a motion for approval of a proposed class action settlement has been filed in the MDL Court. Counsel for Plaintiffs, counsel for New GM, and counsel for the GUC Trust (the “Parties”) engaged in arm’s-length negotiations over more than two years with the assistance of an experienced, court-appointed mediator, former United States Attorney and former United States District Judge Layn Phillips. These negotiations led to the Parties executing the enclosed Settlement Agreement.

Pursuant to 28 U.S.C. § 1715(b), New GM and the GUC Trust provide the following information in connection with the proposed class action settlement. Relevant documents, where available, are included on the enclosed USB drive.

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1. **Copy of the complaint, all materials filed with the complaint, and any amended complaints.**

- (a) A true and correct copy of the the Fifth Amended Consolidated Complaint, filed on November 27, 2017 (MDL Docket 4838), is provided in a folder labeled Exhibit 1 on the enclosed USB drive. Copies of superseded complaints are publicly available on the official GM Ignition Switch Litigation (MDL No. 2543) website, created and maintained by the Parties at the request of the MDL Court¹, and are also available via the Court's PACER system.²

2. **Notice of any scheduled judicial hearing.**

- (a) The MDL Court has scheduled a hearing to consider preliminary approval of the proposed settlement for April 23, 2020 at 9:30 a.m., and a copy of the Notice of Joint Motion and Joint Motion for Preliminary Approval of Class Settlement is provided in a folder labeled Exhibit 2 on the enclosed USB drive.

3. **Any proposed or final notification to class members.**

- (a) Enclosed are copies of the proposed Long Form Notice, Short Form Notice, and Summary Settlement Notice. These notices were submitted to the MDL Court as Exhibits 5, 11, and 12 to the Settlement Agreement attached to the Joint Motion for Preliminary Settlement Approval. These documents are provided in a folder labeled Exhibit 3 on the enclosed USB drive.

4. **Any proposed or final class action settlement.**

- (a) Enclosed are copies of the Settlement Agreement, including exhibits; the Joint Motion for Preliminary Settlement Approval; and supporting memorandums of law submitted by the Parties. These documents are provided in a folder labeled Exhibit 4 on the enclosed USB drive.

¹ The website is available at: <https://gmignitionmdl.com/>. In addition to the complaints, the website has, among other things, case orders, transcripts, and counsel information.

² The Court's PACER system can be accessed at <https://ecf.nysd.uscourts.gov>. Superseded complaints are available at MDL Docket Numbers 275, 347, 1139, 1915, and 3356.

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5. **Any settlement or other agreement contemporaneously made between class counsel and counsel for the Defendants.**
 - (a) No other settlement or agreement was made contemporaneously between class counsel and counsel for New GM or the GUC Trust.
6. **Any final judgment or notice of dismissal.**
 - (a) At this time, no final judgment or notice of dismissal has been proposed or entered in connection with this class settlement.
7. **Class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement.**
 - (a) At this time, it is not feasible to provide names of class members who reside in each State. *See* 28 U.S.C. § 1715(b)(7)(B). A chart showing a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement is provided in a folder labeled Exhibit 5 on the enclosed USB drive.
8. **Any written judicial opinion relating to the materials described in items 3-6.**
 - (a) There has been no written judicial opinion relating to the materials described above.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Wendy L. Bloom

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

/s/ Kristin Going
McDermott Will & Emery
340 Madison Avenue
New York, NY 10173

Counsel for the GUC Trust

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SERVICE LIST

<p>The Honorable William Barr Attorney General of the United States United States Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001</p>	<p>The Honorable Xavier Becerra Office of the Attorney General c/o CAFA Coordinator Consumer Law Section 455 Golden Gate Ave., Suite 11000 San Francisco, CA 94102</p>
<p>The Honorable Jay Clayton U.S. Securities and Exchange Commission SEC Headquarters 100 F Street, NE Washington, DC 20549</p>	<p>The Honorable Phil Weiser Office of the Colorado Attorney General Ralph L. Carr Judicial Building 1300 Broadway, 10th Floor Denver, CO 80203</p>
<p>The Honorable Kevin G. Clarkson Office of the Alaska Attorney General 1031 W. 4th Avenue Suite 200 Anchorage, AK 99501-1994</p>	<p>The Honorable William Tong Office of the Connecticut Attorney General 165 Capitol Avenue Hartford, CT 06106</p>
<p>The Honorable Steve Marshall Office of the Alabama Attorney General 501 Washington Avenue Montgomery, AL 36104</p>	<p>The Honorable Karl A. Racine District of Columbia Attorney General 441 4th Street, NW Suite 1100S Washington, DC 20001</p>
<p>The Honorable Leslie Rutledge Arkansas Attorney General Office 323 Center Street Suite 200 Little Rock, AR 72201</p>	<p>The Honorable Kathy Jennings Delaware Department of Justice Carvel State Office Building 820 N. French Street Wilmington, DE 19801</p>
<p>The Honorable Mark Brnovich Office of the Arizona Attorney General 2005 N. Central Avenue Phoenix, AZ 85004-2926</p>	<p>The Honorable Ashley Moody Office of the Attorney General State of Florida PL-01 The Capitol Tallahassee, FL 32399-1050</p>

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<p>The Honorable Chris Carr Office of the Georgia Attorney General 40 Capitol Square, SW Atlanta, GA 30334</p>	<p>The Honorable Derek Schmidt Kansas Attorney General 120 S.W. 10th Ave., 2nd Floor Topeka, KS 66612</p>
<p>The Honorable Clare E. Connors Department of the Attorney General 425 Queen Street Honolulu, HI 96813</p>	<p>The Honorable Daniel Cameron Office of the Kentucky Attorney General 700 Capitol Avenue Capitol Building, Suite 118 Frankfort, KY 40601</p>
<p>The Honorable Tom Miller Office of the Attorney General of Iowa Hoover State Office Building 1305 E. Walnut Street Des Moines, IA 50319</p>	<p>The Honorable Jeff Landry Office of the Louisiana Attorney General P.O. Box 94095 Baton Rouge, LA 70804-4095</p>
<p>The Honorable Lawrence Wasden Office of the Attorney General State of Idaho 700 W. Jefferson Street, Suite 210 P.O. Box 83720 Boise, ID 83720-0010</p>	<p>The Honorable Maura Healey Office of the Attorney General of Massachusetts ATTN: CAFA Coordinator/General Counsel's Office One Ashburton Place Boston, MA 02108-1518</p>
<p>The Honorable Kwame Raoul Illinois Attorney General James R. Thompson Center 100 W. Randolph Street Chicago, IL 60601</p>	<p>The Honorable Brian Frosh Office of the Maryland Attorney General 200 St. Paul Place Baltimore, MD 21202-2202</p>
<p>The Honorable Curtis T. Hill, Jr. Office of the Indiana Attorney General Indiana Government Center South 302 West Washington Street, 5th Floor Indianapolis, IN 46204</p>	<p>The Honorable Aaron Frey Office of the Maine Attorney General 6 State House Station Augusta, ME 04333</p>

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<p>The Honorable Dana Nessel Office of the Michigan Attorney General P.O. Box 30212 525 W. Ottawa Street Lansing, MI 48909-0212</p>	<p>The Honorable Wayne Stenehjem North Dakota Office of the Attorney General State Capitol 600 E. Boulevard Avenue, Dept. 125 Bismarck, ND 58505-0040</p>
<p>The Honorable Keith Ellison Office of Minnesota Attorney General Attention: CAFA Coordinator 445 Minnesota Street, Suite 1400 St. Paul, MN 55101-2131</p>	<p>The Honorable Doug Peterson Office of the Nebraska Attorney General 345 State Capitol P.O. Box 98920 Lincoln, NE 68509-8920</p>
<p>The Honorable Eric Schmitt Office of the Missouri Attorney General Supreme Court Building 207 W. High Street P.O. Box 899 Jefferson City, MO 65101</p>	<p>The Honorable Gordon MacDonald New Hampshire Attorney General 33 Capitol Street Concord, NH 03301</p>
<p>The Honorable Lynn Fitch Mississippi Attorney General's Office Department of Justice P.O. Box 220 Jackson, MS 39205</p>	<p>The Honorable Gurbir S. Grewal Office of the New Jersey Attorney General Richard J. Hughes Justice Complex 25 Market Street, P.O. Box 080 Trenton, NJ 08625</p>
<p>The Honorable Tim Fox Office of the Montana Attorney General Justice Bldg., Third Floor P.O. Box 201401 215 N. Sanders Street Helena, MT 59620-1401</p>	<p>The Honorable Hector Balderas Office of the New Mexico Attorney General P.O. Drawer 1508 Santa Fe, NM 87504-1508</p>
<p>The Honorable Josh Stein Office of the North Carolina Attorney General Department of Justice 114 West Edenton Street Raleigh, NC 27603</p>	<p>The Honorable Aaron D. Ford Nevada Attorney General Old Supreme Ct. Bldg. 100 North Carson Street Carson City, NV 89701</p>

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<p>The Honorable Letitia A. James Office of the New York Attorney General c/o CAFA Coordinator 28 Liberty St., 15th FL New York, NY 10005</p>	<p>The Honorable Alan Wilson South Carolina Attorney General Rembert C. Dennis Office Bldg. P.O. Box 11549 Columbia, SC 29211-1549</p>
<p>The Honorable Dave Yost Ohio Attorney General State Office Tower 30 E. Broad Street, 14th Floor Columbus, OH 43266</p>	<p>The Honorable Jason Ravnsborg South Dakota Office of the Attorney General 1302 East Highway 14, Suite 1 Pierre, SD 57501-8501</p>
<p>The Honorable Mike Hunter Oklahoma Office of the Attorney General 313 NE 21st Street Oklahoma City, OK 73105</p>	<p>The Honorable Herbert H. Slatery, III Tennessee Office of the Attorney General and Reporter P.O. Box 20207 Nashville, TN 37202-0207</p>
<p>The Honorable Ellen F. Rosenblum Office of the Oregon Attorney General Oregon Department of Justice 1162 Court Street, NE Salem, OR 97301-4096</p>	<p>The Honorable Ken Paxton Office of the Attorney General of Texas Capitol Station P.O. Box 12548 Austin, TX 78711-2548</p>
<p>The Honorable Josh Shapiro Pennsylvania Office of the Attorney General 16th Floor, Strawberry Square Harrisburg, PA 17120</p>	<p>The Honorable Sean Reyes Utah Office of the Attorney General 350 N State St., Suite 230 Salt Lake City, UT 84114-2320</p>
<p>The Honorable Peter F. Neronha Rhode Island Office of the Attorney General 150 South Main Street Providence, RI 02903</p>	<p>The Honorable Mark Herring Office of the Virginia Attorney General 202 North Ninth Street Richmond, VA 23219</p>

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<p>The Honorable TJ Donovan Office of the Attorney General of Vermont 109 State Street Montpelier, VT 05609-3171</p>	<p>The Honorable Leevin T. Camacho Office of the Attorney General 590 S. Marine Corps Drive, Suite 901 Tamuning, Guam 96913</p>
<p>The Honorable Bob Ferguson Washington State Office of the Attorney General 1125 Washington St SE P.O. Box 40100 Olympia, WA 98504-0100</p>	<p>The Honorable Edward Manibusan Northern Mariana Islands Attorney General Administration Building Caller Box 10007 Saipan, MP 96950-8907</p>
<p>The Honorable Josh Kaul Office of the Wisconsin Attorney General Dept of Justice, State Capitol, RM 114 East P.O. Box 7857 Madison, WI 53707-7857</p>	<p>The Honorable Dennise N. Longo Quinones Puerto Rico Attorney General P.O. Box 902192 San Juan, PR 00902-0192</p>
<p>The Honorable Patrick Morrisey West Virginia Attorney General State Capitol Complex Bldg. 1, Room E-2 1900 Kanawha Blvd E Charleston, WV 25305</p>	<p>The Honorable Denise N. George Virgin Islands Attorney General, Department of Justice 3438 Kronprindsens Gade GERS Bldg, 2nd Floor St. Thomas, VI 00802</p>
<p>The Honorable Bridget Hill Office of the Wyoming Attorney General Kendrick Building 2320 Capitol Avenue Cheyenne, WY 82002</p>	
<p>The Honorable Talauega Eleasalo V. Ale American Samoa Attorney General American Samoa Government, Exec. Ofc. Bldg, Utulei, Territory of American Samoa Pago Pago, AS 96799</p>	

Exhibit 5 to Exhibit 15:

Notice Pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715

Estimate of the Number of Class Members by State/Territory^[1]

State/Territory	Estimated Number of Class Members	Percentage of Total Estimated Class Members
AK	38,021	0.11%
AL	616,077	1.84%
AR	372,030	1.11%
AZ	693,929	2.07%
CA	1,782,042	5.33%
CO	395,414	1.18%
CT	254,834	0.76%
DC	26,064	0.08%
DE	92,869	0.28%
FL	1,901,770	5.69%
GA	915,446	2.74%
HI	84,538	0.25%
IA	606,165	1.81%
ID	144,111	0.43%
IL	1,928,239	5.77%
IN	1,172,955	3.51%
KS	384,955	1.15%
KY	544,616	1.63%
LA	551,954	1.65%
MA	423,562	1.27%
MD	510,780	1.53%
ME	146,780	0.44%
MI	2,247,988	6.72%
MN	824,501	2.47%
MO	922,778	2.76%
MS	442,331	1.32%
MT	116,807	0.35%
NC	878,831	2.63%
ND	128,959	0.39%
NE	298,534	0.89%
NH	115,800	0.35%
NJ	744,600	2.23%
NM	222,654	0.67%
NV	243,607	0.73%
NY	1,642,539	4.91%
OH	2,145,478	6.42%
OK	504,182	1.51%
OR	189,766	0.57%

State/Territory	Estimated Number of Class Members	Percentage of Total Estimated Class Members
PA	1,571,569	4.70%
PR	41,574	0.12%
RI	77,912	0.23%
SC	461,351	1.38%
SD	167,170	0.50%
TN	746,135	2.23%
TX	2,578,969	7.71%
UT	230,809	0.69%
VA	692,413	2.07%
VT	61,284	0.18%
WA	370,722	1.11%
WI	879,984	2.63%
WV	233,699	0.70%
WY	73,704	0.22%

Source: New GM data; IHS/Polk vehicle registration data

[1] The number of class members in each state/territory is estimated from New GM data identifying the vehicle identification number (“VIN”) for each vehicle subject to the Recalls and then excluding those vehicles for which the VIN does not appear in vehicle registration data obtained by New GM from IHS Markit/Polk for all the fifty States, the District of Columbia, and Puerto Rico. Such vehicle registration data is not available for Guam or the United States Virgin Islands. Also excluded were those vehicles only ever registered through the Recall Announcement Date to (1) daily rental fleet purchasers, owners and lessees and (2) governmental entities as identified in the data by IHS Markit/Polk, all of which are excluded from the Class. Using this process, New GM identified 13,796,508 Subject Vehicles. Next, for these 13,796,508 Subject Vehicles for which there were multiple owners, purchasers and/or lessees over the period from initial sale of the vehicle until the Recall Announcement Date, New GM excluded just those who were identified as daily rental fleet or governmental entities by the IHS Markit/Polk data. New GM then summed the total number of owners, purchasers and lessees remaining and utilized the vehicle registration data identifying the state in which the Subject Vehicle was registered to estimate the number of class members in each State. New GM does not have access to the names and addresses associated with each registration of a Subject Vehicle; rather, New GM knows only the state in which the Subject Vehicle was registered for each instance in which the Subject Vehicle is registered to a Person with both a different name and address than the prior registrant. Thus, New GM was unable to de-duplicate the data, which means that Class Members who purchased, owned, or leased multiple Subject Vehicles during the class period are counted multiple times in this data.

Note that New GM did not have access to vehicle registration data for the 114,498 model year 1997 vehicles subject to the Recalls; therefore, New GM is unable to estimate the number of class members associated with those model year 1997 Subject Vehicles nor the states in which they reside. Also, the State or U.S. territory of each owner, purchaser or lessee is recorded at the time of initial registration; the IHS Markit/Polk data does not provide subsequent registration information in the event the Class Member moved to another state/territory with the Subject Vehicle. Additionally, New GM does not have access to data for changes to the owner, purchaser or lessee of a Subject Vehicle where the new owner, purchaser and/or lessee did not register the Subject Vehicle because IHS Markit/Polk data is pulled from the States’ vehicle registration records; thus, any Class Member associated with such a transaction is not included in these estimates. Lastly, New GM’s estimates are subject to any errors that exist in the IHS Markit/Polk data and any errors in underlying registration data acquired by IHS Markit/Polk and provided to New GM.

(All capitalized terms referenced in this footnote have the same meaning as in the Settlement Agreement.)