

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

GENERAL MOTORS LLC IGNITION
SWITCH LITIGATION

No. 14-MD-2543 (JMF)

This Document Relates to:

ALL ECONOMIC LOSS ACTIONS

**NOTICE OF JOINT MOTION AND JOINT MOTION FOR PRELIMINARY
APPROVAL OF CLASS SETTLEMENT, APPROVAL OF NOTICE PROCEDURES,
AND APPOINTMENT OF CLASS COUNSEL & CLASS REPRESENTATIVES**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on **April 23, 2020, at 9:30 a.m.**, or as soon thereafter as the matter may be heard, a hearing will be held before the Honorable Martin Glenn, United States Bankruptcy Judge for the Southern District of New York, sitting jointly with the Honorable Jesse M. Furman, United States District Court Judge for the Southern District of New York, in the Courtroom of the Honorable Jesse M. Furman, located at 40 Centre Street, New York, NY 10007, or, subject to further order of the Courts, by telephone (the “Joint Hearing”). At the Joint Hearing, the Economic Loss Plaintiffs (“Plaintiffs”), General Motors LLC (“New GM”), and the Motors Liquidation Company GUC Trust (the “GUC Trust”) (collectively, the “Parties”) will and hereby do move the Court for entry of an Order:

- (a) Granting preliminary approval of the proposed Settlement Agreement entered into between the Parties, including establishing and creating the Common Fund as a Qualified Settlement Fund Trust pursuant to Internal Revenue Code § 468B and the Regulations issued thereto;
- (b) Directing that notice be disseminated to the Class in the manner specified in the Settlement Agreement;
- (c) Determining that the Court, at the final approval stage, will likely certify the Class and Subclasses as defined in the Settlement Agreement for settlement purposes only;
- (d) Appointing Plaintiffs as interim class representatives of the proposed Class and certain Plaintiffs as interim representatives of the Subclasses for settlement purposes only;
- (e) Appointing, on an interim basis, Steve W. Berman, of Hagens Berman Sobol Shapiro LLP and Elizabeth J. Cabraser of Lief Cabraser Heimann & Bernstein, LLP as Class Counsel for the proposed Class for settlement purposes only;
- (f) Appointing, on an interim basis, (i) Marc Seltzer of Susman Godfrey as Subclass 1 Counsel; (ii) Joe Rice and Kevin Dean of Motley Rice as Subclass 2 Counsel; (iii) Peter Prieto and Matthew Weinshall of Podhurst Orseck, P.A. as Subclass 3 Counsel; (iv) David Boies and Steven Davis of Boies Schiller Flexner LLP as Subclass 4 Counsel; and (v) Adam Levitt and John Tangren of DiCello Levitt Gutzler as Subclass 5 Counsel, each for settlement purposes only;
- (g) Appointing Jennifer M. Keough of JND Legal Administration (“JND”) as Class Action Settlement Administrator and directing her to carry out the duties and responsibilities of the Class Action Settlement Administrator specified in the Settlement Agreement;

- (h) Appointing Flora Bian of JND as Qualified Settlement Fund Administrator and Trustee to carry out all duties and responsibilities of the Qualified Settlement Fund Administrator and Trustee as specified in the Settlement Agreement and the Qualified Settlement Fund Trust Agreement; and
- (i) Setting a Fairness Hearing and certain other dates and procedures in connection with the final approval of the Settlement Agreement, including but not limited to (i) the deadlines and procedures for Settlement Objections and Opt-Outs, and (ii) the deadlines and procedures for Settlement Claims.

This Motion is based on this Notice of Motion and Motion, Plaintiffs' Memorandum in Support of this Joint Motion, New GM's Memorandum in Support of this Joint Motion, the Settlement Agreement and all Exhibits attached thereto, the Declarations of Steve W. Berman and Elizabeth J. Cabraser and all exhibits thereto, the Declaration of the Hon. Layn R. Phillips, the argument of counsel, all papers and records on file in this matter, and such other matters as the Court may consider.

Dated: March 27, 2020

Respectfully submitted,

**HAGENS BERMAN SOBOL SHAPIRO
LLP**

**LIEFF CABRASER HEIMANN
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By: /s/ Elizabeth J. Cabraser

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on March 27, 2020, which will send notification of such filing to the e-mail addresses registered.

/s/ Steve W. Berman _____

Steve W. Berman