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March 7, 2018

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re General Motors LLC Ignition Switch Litigation*, 14-MD-2543

Dear Judge Furman:

Pursuant to Order No. 131 ¶ 11 (Docket No. 4499), Lead Counsel for plaintiffs and counsel for New GM, having met and conferred, write jointly to request a short extension of certain deadlines in the economic loss litigation schedule and to propose *Daubert* motion practice in connection with summary judgment and class certification issues. This request is necessary as the parties continue to work in good faith to complete expert discovery.

First, the parties propose to adjust the current expert discovery deadlines as follows, moving the deadline for plaintiffs to submit rebuttal reports from March 23, 2018 to **Friday, April 20, 2018**, and the deadline to depose New GM's experts and plaintiffs' rebuttal experts from April 6 to **Friday, May 4, 2018**.

Second, the parties propose to adjust the current summary judgment and class certification motion practice deadlines by moving the deadline for opening briefs from April 6 to **Friday, May 4, 2018**, opposition briefs from May 18 to **Friday, June 22, 2018**, and reply briefs from June 15 to **Friday, July 20, 2018**.

Third, the parties propose streamlined *Daubert* motion practice relating to the parties' summary judgment and class certification motions as follows: (1) on **Friday, May 4, 2018**, New GM will file its *Daubert* motion (if any) in connection with its summary judgment motion; (2) on **Friday, June 22, 2018**, Lead Counsel will their *Daubert* motion (if any) in connection with New GM's motion for summary judgment and file any response to New GM's May 4 *Daubert* motion, and New GM will file its *Daubert* motion (if any) limited to plaintiffs' class certification motion (New GM's motion must not duplicate arguments as to any experts already the subject of New GM's May 4 *Daubert* motion); (4) on **Friday, July 20, 2018**, New GM will file its reply in support of its May 4 *Daubert* motion and any opposition to plaintiffs' *Daubert* motion, and Lead Counsel will file their opposition to New GM's June 22 *Daubert* motion; and (5) on **Friday, August 10,**

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2018, the parties will file reply briefs in support of their respective June 22 *Daubert* motions. Also, at the upcoming March 22 status conference, New GM would like to discuss the importance, need and timing of a separately scheduled *Daubert* hearing. Plaintiffs do not believe that a separately scheduled *Daubert* hearing should be held and will be prepared to discuss the issue at the status conference.

Fourth, the parties propose to change the hearing on summary judgment and class certification contemplated in Order No. 131 from “September 2018 or as soon thereafter as is reasonably practical” to “September or October 2018 or as soon thereafter as is reasonably practical.”

This is the parties’ second request for an extension of the deadlines in Order No. 131, and will not impact any other deadlines in the economic loss case. Consistent with Order No. 131, the parties have attached as Exhibit 1 hereto a revised economic loss deadline chart incorporating the parties’ proposed extension request.

Respectfully submitted,

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

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

Counsel for Defendant General Motors LLC

cc: MDL Counsel of Record