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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. 140 (Docket No. 4967), Lead Counsel for plaintiffs and counsel for New GM write jointly to request a short extension of the deadline for the parties to submit their joint letter proposing next steps to address: (1) any remaining disputes on successor liability claims; (2) any remaining disputes on air bag deployment claims; (3) any remaining disputes on “no plausibly pled defect / causation” claims; (4) any remaining disputes on statute of limitation/repose claims; (5) procedures for the motions to withdraw that have been filed by counsel; and (6) procedures for pro se plaintiffs who failed to respond to notices sent pursuant to Order No. 140. (*See id.* §§ II-III; 2/26/2018 Memo Endorsement at 16, Docket No. 5107.)

The parties respectfully request an extension until **Wednesday, March 14, 2018** to submit the joint letter. The current deadline is Friday, March 9, 2018. The parties believe this additional time will aid the parties in their ongoing meet and confer to narrow disputes, as well as to account for late responses received after the Court’s February 26, 2018 Memo Endorsement, which provided non-responsive counsel until March 5, 2018 to comply with Order No. 140.

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