

**KIRKLAND & ELLIS LLP**

AND AFFILIATED PARTNERSHIPS

Richard C. Godfrey, P.C.  
To Call Writer Directly:  
(312) 862-2391  
richard.godfrey@kirkland.com

300 North LaSalle  
Chicago, Illinois 60654

(312) 862-2000

www.kirkland.com

Facsimile:  
(312) 862-2200

September 17, 2015

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 (JMF)

Dear Judge Furman:

Counsel for General Motors LLC (“New GM”) and Hilliard Muñoz Gonzalez LLP and Thomas J. Henry Injury Attorneys (certain “Claimants’ Counsel”) jointly write regarding the issue of settlement as it relates to certain of the personal injury and wrongful death lawsuits pending in the MDL. As the Court knows, Your Honor previously has inquired of the parties as to the status of settlement discussions, and requested that the parties keep the Court informed regarding such discussions. Consistent with Your Honor’s request and the discussions that the parties and Court have had on this topic, most recently at the Status Conferences of March 13 and April 24, we are very pleased to inform the Court that certain Claimants’ Counsel and New GM have entered into a Confidential Memorandum of Understanding in which approximately 1,380 post-Bankruptcy personal injury and wrongful death claimants represented by certain Claimants’ Counsel may be eligible to participate in an aggregate settlement. We anticipate filing shortly a Motion and Proposed Order seeking establishment of a Qualified Settlement Fund and appointment of Special Masters.

The six bellwether trials are not part of the Memorandum of Understanding, still remain on the docket, and the parties will be prepared to discuss trial issues at the October 9 Status Conference.

KIRKLAND & ELLIS LLP

The Honorable Jesse M. Furman  
September 17, 2015  
Page 2


If the Court has any questions, please let us know.

Respectfully submitted,




Richard C. Godfrey, P.C.  
Mike Brock  
Wendy Bloom  
Andrew B. Bloomer, P.C.

*Counsel for Defendant General Motors LLC*



Robert C. Hilliard, Esq.  
Hilliard Munoz Gonzales LLP  
719 S. Shoreline Blvd., Suite 500  
Corpus Christi, TX 78401



Thomas J. Henry, Esq.  
Thomas J. Henry Injury Attorneys  
521 Starr St.  
Corpus Christi, TX 78401

*Claimants' Counsel*

cc: MDL Counsel of Record