

Multiple Documents

Part	Description
1	6 pages
2	Exhibit 1
3	Exhibit 2
4	Exhibit 3
5	Exhibit 4
6	Exhibit 5
7	Exhibit 6
8	Exhibit 7
9	Exhibit 8

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

MDL No. 2543

GENERAL MOTORS LLC IGNITION
SWITCH LITIGATION

Master File No.: 14-MD-2543 (JMF)

This Document Relates to: All Actions

**DECLARATION OF ROBERT C. HILLIARD IN SUPPORT OF CO-LEAD COUNSEL'S
MEMORANDUM IN OPPOSITION TO LANCE COOPER'S MOTION TO REMOVE
CO-LEAD COUNSEL AND FOR RECONSIDERATION OF THE ORDER APPROVING
THE QUALIFIED SETTLEMENT FUND**

I, Robert C. Hilliard, declare under penalty of perjury as follows:

1. I am a founding partner of the law firm Hilliard Muñoz Gonzales, LLP ("HMG") and Co-Lead Counsel for Plaintiffs in the matter, *In re: General Motors, LLC Ignition Switch Litigation*, MDL No. 2543, Civil Action No. 1:14-md-2543, in the United States District Court for the Southern District of New York.

2. I submit this Declaration in support of Co-Lead Counsel's Memorandum in Opposition to Lance Cooper's Motion to Remove Co-Lead Counsel and for Reconsideration of the Order Approving the Qualified Settlement Fund. The following facts are within my personal knowledge, and, if called and sworn as a witness, I could and would testify competently to them.

3. As Co-Lead Counsel, I have encouraged and welcomed the participation of Executive Committee ("EC") members. Robust participation of EC members, Liaison Counsel, and their firms was crucial in this large-scale litigation that was readied for the first bellwether trial in just 16 months.

4. My firm coordinated the deposition scheduling of almost 100 GM and Delphi witnesses and repeatedly reached out to the EC to assist in deposing those witnesses.

5. On April 20, 2015, Mr. Cooper informed Co-Lead Counsel that he would not complete the work he was asked to perform as an EC member, including deposing GM employees Joseph Fedullo and Jim Sewell. Mr. Cooper confirmed that this meant he was resigning from the EC. A true and correct copy of this April 20, 2015 email correspondence is attached hereto as Ex. 1.

6. Despite his informal resignation, Co-Lead Counsel continued to include Mr. Cooper on all communications to the EC. My firm also continued to communicate with Mr. Cooper in connection with his representations that he was acting on behalf of state case Coordinated Counsel.

7. Prior to the start of GM depositions in mid-May 2015, Co-Lead Counsel hosted a leadership meeting at the San Francisco office of Co-Lead Counsel, Lief Cabraser Heinmann & Bernstein, to discuss the evidence and deposition strategy. All EC members were invited to attend in person or telephonically, including Mr. Cooper.

8. Over the course of discovery, EC members took 46 of 98 depositions of GM and Delphi employees.

9. Mr. Cooper appeared at four depositions and conducted limited questioning on behalf of the state court Coordinated Counsel: Jaclyn Palmer (5/19/15); Gay Kent (6/17/15); Ray DeGiorgio (Day 1) (6/18/15); and Ray DeGiorgio (Day 2) (6/19/15). Mr. Cooper gave notice that he would appear at the depositions of Lawrence Buonomo, Deborah Nowak-Vanderhoef, David Trush, Brian Stouffer, Ronald Porter, Steven Oakley, Jennifer Sevigny, Alberto Manzor, and James Federico, but did not appear.

10. On August 21, 2015, I sent an email to Co-Lead Counsel and the EC asking for help in preparing the six bellwether cases for trial. I cited the EC's "deep reserve of talent [and] experience" in requesting this help. My goal was to ensure that there were "no 'silos'" and that the entire leadership team was working together. Based on this initial communication, EC member Boies Schiller took primary responsibility for MDL Bellwether Trial #2. This email was addressed to the entire EC, including Mr. Cooper. A true and correct copy of this August 21, 2015 email is attached hereto as Ex. 2.

11. On August 27, 2015, Co-Lead Counsel sent a memo to the EC and Liaison Counsel requesting trial preparation help with the *Scheuer* case. We wrote: "We have a lot of hard work to do to prepare for the first bellwether trial, which begins on January 11, 2016. The Co-Leads would like to utilize many of the accomplished and experienced attorneys of the Executive Committee and Liaison Counsel to help us prepare for that trial." As a result of this memo, many EC and Liaison Counsel firms provided key assistance in preparing *Scheuer* for trial and continued to assist the *Scheuer* team during trial. This memo was sent to the entire EC, including Mr. Cooper. A true and correct copy of this August 27, 2015 memo and cover email is attached hereto as Ex. 3. Although Co-Lead Counsel sent the above-referenced communications to the entire EC, including Mr. Cooper, I never received any response from him.

12. My actions with respect to the *Yingling* case were motivated by what was in the best interests of all MDL plaintiffs.

13. After my firm selected the *Yingling* case to be included in the Initial Discovery Pool, I discussed an association with Mr. Pribanic in representing his client. Mr. Pribanic was not part of the leadership structure and not involved in the day-to-day discovery and expert work that demanded a large team of attorneys' full-time attention. I found Mr. Pribanic to be friendly, cooperative, and open.

14. I spoke to Mr. Pribanic in April 2015 about the possibility of an association with respect to the *Yingling* case. In an effort to ensure participation in the trial, I proposed any association on terms agreeable to Mr. Pribanic, and made some suggestions. Though sharing of fees was discussed under many different scenarios, the most significant issue, in my view, was

that my team and I be allowed to assist Mr. Pribanic in actually trying the case.

15. As I told my co-counsel on April 14, 2015 with respect to my discussion with Mr. Pribanic, “we were not interested in sharing fees, just helping with getting this [*Yingling*] case ready.” A true and correct copy of the April 14, 2015 email is attached hereto as Ex. 4.

16. As a result, a Consent to Associate was executed by Mr. Pribanic and HMG with respect to pretrial matters. Mr. Pribanic expressed that he was “happy to cooperate” and that he “look[ed] forward” to working with me and my team. Mr. Thomas J. Henry (my co-counsel) also signed the Consent to Associate. A true and correct copy of the April 21, 2015 correspondence and the executed Consent to Associate is attached hereto as Ex. 5.

17. On July 27, 2015, Plaintiffs filed a joint proposal with GM regarding the order of bellwether trials, which proposed that *Yingling* would be the first bellwether trial. I believed at that time that Co-Lead Counsel (specifically myself and Mr. Berman) would have some role in the *Yingling* trial. Although I later raised the fee issue in the event of a Plaintiff’s verdict in *Yingling*, my goal was to participate in the first trial on whatever terms Mr. Pribanic found acceptable, including no fee sharing.

18. On July 28, 2015, Mr. Pribanic and I met in Pittsburgh, Pennsylvania over dinner to meet each other for the first time and discuss the *Yingling* and *Lakisha-Ward Green* (see ¶26 below) cases.

19. On August 3, 2015, Mr. Pribanic sent me a letter declining my “kind offer” to try the *Yingling* case with him. He told me he wanted to “go[] it alone.” A true and correct copy of that August 3, 2015 correspondence is attached hereto as Ex. 6.

20. After Mr. Pribanic declined Co-Lead Counsel’s participation in trying *Yingling*, Co-Lead Counsel determined that it would be in the best interests of all MDL plaintiffs if Co-Lead Counsel adjusted the order of trials so that Co-Lead Counsel could try the first bellwether case. Mr. Pribanic’s case would still remain a bellwether selection.

21. The impetus to adjust the order was in no way a result of informal conversations regarding attorney’s fees. Co-Lead Counsel had mastered the facts and expert issues and was best positioned to go to trial in January 2016.

22. For example, at that time, Co-Lead Counsel and their firms had reviewed more than 923,426 GM documents. Co-Lead Counsel and their firms had taken 24 of the 35 depositions of GM employees and former employees that had been conducted. Co-Lead Counsel and their firms had worked with all of the common liability experts, and with 11 of the case-specific experts for the bellwether trials. Even as to the *Yingling* case, Co-Lead Counsel had worked with (and paid for) 6 of the 12 experts slated to testify in that trial. Understandably, Mr. Pribanic, at that time, did not have the benefit of this extensive document review, expert work, and organizational knowledge. While Mr. Pribanic is an exceptional and well-qualified trial lawyer, it was the view of Co-Lead Counsel that it was essential that the MDL Co-Leads try the first bellwether trial.

23. My team and I viewed the *Scheuer* case a rational choice for the first bellwether

trial based on the following factors: (1) the delta-v that Plaintiff's experts calculated demonstrated unequivocally that the airbags should have deployed; (2) the accident occurred when replacement parts to fix the defect were not available; Mr. Scheuer followed the directive in the recall notice and contacted the dealership to get his defective switch replaced, but he was sent away without the new switch; (3) as Mr. Scheuer's treating physician testified at trial, Mr. Scheuer suffered an annular tear at the C4-C5 level of his cervical spine as a result of the crash; (4) punitive damages were available under applicable Oklahoma law; and (5) Co-Lead Counsel, after having led the litigation since being appointed and done the bulk of the work in the MDL litigation, would conduct the trial. In addition, Mr. Scheuer's crash came after he followed GM's instruction to remove other keys from his key ring—instructions that GM asserted would make him safe and avert a defect that would prevent airbags from deploying (instructions that turned out to be false).

24. On August 6, 2015, after the *Yingling* case was moved to fifth in the bellwether order, Mr. Pribanic sent Co-Lead Counsel a draft letter to the Court objecting to the change. Mr. Pribanic never filed that letter because he and Co-Lead Counsel were able to better understand each others' positions through the meet and confer process.

25. During an August 11, 2015 meet and confer, Co-Lead Counsel discussed with Mr. Pribanic the order of the bellwether trials. We explained that Co-Lead Counsel, who possessed the deepest knowledge of the fact and expert issues, should conduct the first trials. Mr. Pribanic requested that Co-Lead Counsel seek Court permission to move *Yingling* to the #3 position and we agreed to do so.

26. Later that month, I partnered with Mr. Pribanic in convincing a Pennsylvania court to overturn the involuntary manslaughter conviction of Ms. Lakisha Ward-Green, whose defective ignition switch contributed to the non-deployment crash that killed her passenger boyfriend.

27. At the November 20, 2015 status conference, I introduced Mr. Pribanic to the Court and, over GM's objection, requested that the Court move the *Yingling* case from the fifth to the third bellwether case. The Court agreed to do so.

28. I also welcomed Mr. Pribanic's and his associate's presence during the first week of the *Scheuer* trial – in both the Courtroom and in the *Scheuer* trial team's war rooms, sharing freely all work-product, expert reports, outlines, summaries and strategies.

29. Since the *Scheuer* trial ended, my team has been providing Mr. Pribanic with any and all work product that may be helpful in trying the *Yingling* case.

30. I will be meeting with Mr. Pribanic, as well as other members of the *Scheuer* trial team and the Boies trial team (trial #2), in person beginning February 2nd and 3rd in Texas to assist with trial preparation.

31. On September 16, 2015, HMG and Thomas J. Henry Injury Attorneys (my co-counsel) entered into a Memorandum of Understanding ("MOU") with GM to settle our clients' death and personal injury cases that were filed in this MDL. All of our MDL clients may be eligible to settle their claims under the MOU with the exception of the five cases that were

selected as bellwether trial cases.

32. The only reason these five bellwether trial cases are not part of the MOU is that GM refused to settle the bellwether trial cases.

33. On September 17, 2015, my firm issued a press release announcing the partial settlement of the personal injury and death cases. A true and correct copy of the press release is attached as Ex. 7.

34. On that same day, I also sent an email to the EC explaining that I settled “approx. 1385 cases that I have” and attached the press release (Ex. 7 hereto) that explained the general parameters of the agreement. A true and correct copy of the September 17, 2015 email is attached as Ex. 8. The email was sent to the entire EC, including Mr. Cooper.

35. The parties also notified the Court about the settlement via an ECF-docketed letter, which made clear that the bulk of Mr. Henry’s and my clients would be eligible for participation in the aggregate settlement, but that the bellwether trial cases were not part of the MOU.

36. I did not receive any complaint from any EC member or state case Coordinated Action counsel about the MOU.

37. On November 20, 2015, I informed the Court in chambers that my bellwether clients had entered into High/Low Agreements with GM.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 1, 2016

By: /s/ Robert C. Hilliard

Robert C. Hilliard

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 February 1, 2016, which will send notification of such filing to the e-mail addresses registered.

/s/ Steve W. Berman

Steve W. Berman

Exhibit 1

Subject: RE: In re: General Motors Ignition Switch Litigation, No. 14-MD-2543-JMF
Date: Monday, April 20, 2015 at 12:08:13 PM Central Daylight Time
From: Lance Cooper
To: Robert C. Hilliard
CC: Anne Fornecker, Elizabeth Cabraser, Steve Berman, Lauren Gomez, Emily Hilliard, Rudy Gonzales, Steve Shadowen

Yes.

From: Robert C. Hilliard [mailto:bobh@hmglawfirm.com]
Sent: Monday, April 20, 2015 12:46 PM
To: Lance Cooper
Cc: Anne Fornecker; Elizabeth Cabraser; Steve Berman; Lauren Gomez; Emily Hilliard; Rudy Gonzales; Steve Shadowen
Subject: Re: In re: General Motors Ignition Switch Litigation, No. 14-MD-2543-JMF

Lance,

Understood.

I take it you have determined to resign from the executive committee?

Bob

ROBERT C. HILLIARD
-- Attorney at Law --

*Board Certified in Personal Injury
Trial Law & Civil Trial Law*

hmglawfirm.com

CONFIDENTIALITY NOTICE

This electronic mail transmission contains information which is confidential and privileged under the attorney-client communication privilege and/or the attorney work product doctrine and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and delete it from your system.

On Apr 20, 2015, at 10:32 AM, Lance Cooper <lance@thecooperfirm.com> wrote:

Bob,

We have decided not to participate in the response to the objections by King & Spalding, Harold Franklin and Phil Holladay to the MDL Subpoena. I am sure that you will be able to find a firm among the Executive Committee members who can handle this task. In addition, we will also not be taking the depositions of Joseph Fedullo and Jim Sewell. I am sure you can find someone on the Executive Committee who can handle these depositions as well.

Lance

From: Robert C. Hilliard [<mailto:bobh@hmglawfirm.com>]

Sent: Saturday, April 18, 2015 5:57 PM

To: Anne Fornecker; Elizabeth Cabraser; Steve Berman; Lance Cooper; Lauren Gomez; Emily Hilliard; Rudy Gonzales; Steve Shadowen

Subject: Fwd: In re: General Motors Ignition Switch Litigation, No. 14-MD-2543-JMF

time to battle!

ROBERT C. HILLIARD
-- Attorney at Law --

*Board Certified in Personal Injury
Trial Law & Civil Trial Law*

hmglawfirm.com

CONFIDENTIALITY NOTICE

This electronic mail transmission contains information which is confidential and privileged under the attorney-client communication privilege and/or the attorney work product doctrine and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and delete it from your system.

Begin forwarded message:

From: "Zachman, Jeff" <jzachman@mckennalong.com>

Subject: In re: General Motors Ignition Switch Litigation, No. 14-MD-2543-JMF

Date: April 17, 2015 at 5:29:09 PM CDT

To: "Robert C. Hilliard" <bobh@hmglawfirm.com>

Cc: "Darden, Buddy" <bdarden@mckennalong.com>, "Garroway, Nathan" <ngarroway@mckennalong.com>, "Thornton, Bob" (BThornton@KSLAW.com)" <BThornton@KSLAW.com>, "Sieve, Brian D." <bsieve@kirkland.com> (bsieve@kirkland.com)" <bsieve@kirkland.com>

Mr. Hilliard,

Exhibit 2

Subject: roll up our sleeves and out work GM every day.

Date: Friday, August 21, 2015 at 9:14:28 AM Central Daylight Time

From: Robert C. Hilliard

To: GM Co-Lead Group, GM Executive Committee Group

CC: Victor Pribanic

Team,

The first BW trial begins in January, 2016.

Though the Judge has not endorsed the subsequent trial dates yet, we have jointly recommended the following dates:

1.11.16-2.5.16 **Scheuer vs. GM**

4.4.16-4.21.16 **Barthelemy vs. GM**

6.6.16-6.24.16 **Cockram vs. GM**

8.15.16-9.2.16 **Reid vs. GM**

10.27.16-11.4.16 **Yingling vs. GM**

11.28. 16-12.16.16 **Norville vs. Gm**

GM has made clear indications that it intends to try all of the BW cases.

This EC has a deep reserve of talent, experience, and spit and vinegar. Lets get work horses workin!

I would like to assign and staff 6 'trial team's to take primary responsibility for helping prepare each of the trials starting now and invite you and your firm to participate and nominate team members.

This is not an assignment regarding who will actually try the case. This is a project to help get each case ready for trial and to participate in the trial with whomever does try it.

Each team or team leader will meet separately and then with the other teams or team leaders as well as the co-leads to be sure there are no 'silos' and we are all moving forward together, separately.

We are all committed to one goal: nothing falls through the cracks, nothing gets left undone.

One advantage will be that each team gets to learn from the preceding trial. No doubt there will be 'real-time' adjustments to assignments within the teams as the first trials unfold. Each team will be able to see weeks of general liability testimony and how GM is going to defend itself. Each team will be able to understand the defenses as GM puts on its case and adjust accordingly.

Some general thoughts:

Judge Furman has indicated trial will be from 9:30 -2:30 each day. This gives us plenty of time to prepare for the next day.

We are discussing with GM the practical agreements we can reach (how much notice to the other side re who is going to be called to the stand each day, agreed to exhibits and demonstratives, questionnaires, etc).

The day-shift war room team will be on alert during trial, receiving real time instructions and requests and sending suggestions.

The night shift war-room team is as vital and important as any other part of the process, getting witnesses ready, summaries of the day before—adding to responses to directed verdict, etc.

As with any intellectual, psychological and emotional endeavor with this level of commitment playing well with others is a **must**. Tackling massive amounts of pre-trial and war-room trial work day in and day out (while humming a tune) is vital.

When you send your recommendations please include the level of experience/suggested roles of those nominated and any other information you think would help us assign roles. ('she is great at witness prep' 'he is strong on quick briefs re real time legal issues', 'she was lead war-room paralegal for 5 trials', etc).

I also invite you to generally weigh in on this and offer any tweaks you think may help.

Thanks,

Bob

ROBERT C. HILLIARD
-- Attorney at Law --

*Board Certified in Personal Injury
Trial Law & Civil Trial Law*

hmglawfirm.com

CONFIDENTIALITY NOTICE

This electronic mail transmission contains information which is confidential and privileged under the attorney-client communication privilege and/or the attorney work product doctrine and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and delete it from your system.

Exhibit 3

Subject: GM - Memo from Co-Leads re Trial Preparation

Date: Thursday, August 27, 2015 at 10:02:55 AM Central Daylight Time

From: Anne Fornecker

To: GM Executive Committee Group, GM Co-Lead Group, Dawn M. Barrios, Robin L. Greenwald

Counsel:

Please see the attached memo from Elizabeth, Bob and Steve.

Thank you,

Anne

--

ANNE K. FORNECKER

HILLIARD & SHADOWEN LLP

919 Congress, Suite 1325

Austin, Texas 78701

Phone: 512-993-3069

Cell: 1-718-916-3520

Web: www.hilliardshadowenlaw.com





To: Executive Committee and Liaison Counsel

From: Co-Leads

Re: *In re General Motors LLC Ignition Switch Litig.*, MDL No. 2543, Trial Preparation

Date: August 27, 2015

We have a lot of hard work to do to prepare for the first bellwether trial, which begins on January 11, 2016. The Co-Leads would like to utilize many of the accomplished and experienced attorneys of the Executive Committee and Liaison Counsel (“EC/LC”) to help us prepare for that trial. We have identified below descriptions of various trial preparation tasks that we would like to assign to EC/LC members and the experience level of the lawyers whom we expect can best fulfill those various roles. By Monday August 31, 2015, please recommend lawyers from your firms to perform any of the tasks you feel are appropriate given the lawyers’ experience and commitment to the trial preparation team. When you provide your recommendations, please include any trial experience of those you are suggesting and why the recommended lawyers would be a good fit for the assignment.

1. Trial Exhibits and Related Evidence Gathering

We currently anticipate needing four to five (4-5) EC/LC attorneys to assist with gathering evidence for offensive and defensive purposes. The “Trial Exhibit Team” will work on determining the best vehicles to introduce our most convincing evidence, objecting to New GM’s exhibit list, and gathering impeachment or contradictory evidence. This requires mid-level attorneys with excellent knowledge of the Federal Rules of Evidence, preferably in a trial setting. The “Miscellaneous Trial Preparation Team” project requires attorneys to help with various pre-trial tasks that will likely focus on gathering and analyzing the evidence that will best tell our story. For example, one such task will be gathering all the best evidence that proves New GM’s gross negligence post-bankruptcy. We are looking for low-mid level attorneys that are proficient at Everlaw and have mastered the facts of the case.

2. Depositions

We currently anticipate needing three to four (3-4) EC/LC attorneys to help us narrow the universe of deponents we expect to present at trial and to designate deposition testimony. We are looking for mid-level attorneys with trial experience and excellent knowledge of the case. We anticipate that certain testimony will be used across various trials, and that the assigned attorneys may help in more than one trial.

3. Briefing

We would like to assign two to three (2-3) EC/LC attorneys to help us with pre-trial briefing and other written work product including, for example, evidentiary memos, motions in limine, and jury instructions. We are looking for mid-high level attorneys with excellent writing

skills who can turn written work quickly. We anticipate that this task may persist across bellwether trials due to the benefits of institutional knowledge of issues that arise repeatedly.

We hope that the EC/LC members assigned to these tasks will each become an integral part of our pre-trial team. We look forward to receiving your recommendations and working with you further as we prepare for trial.

Exhibit 4

From: Robert C. Hilliard

Sent: Tuesday, April 14, 2015 4:18 PM

To: TJH; rwilson@tjhlaw.com; Lauren Gomez; Rudy Gonzales

Cc: Victor Pribanic

Subject: Re: Nidia Yingling individually and representative of the estate of James Yingling v. GM

Robert,

I spoke to Victor.

Told him we were not interested in sharing fees, just helping with getting this case ready.

He will shortly send us a consent crafted to protect his fees and allowing us to help with the preparation of his client's case.

Please coordinate with his office and let his team utilize its fire power to assist in getting this case in the strongest position as possible and as quick as possible.

thanks,

Victor, appreciate the willingness to allow us to assist and I look forward to meeting you.

bob

ROBERT C. HILLIARD
-- Attorney at Law --

*Board Certified in Personal Injury
Trial Law & Civil Trial Law*

hmglawfirm.com

CONFIDENTIALITY NOTICE

This electronic mail transmission contains information which is confidential and privileged under the attorney-client communication privilege and/or the attorney work product doctrine and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and

Exhibit 5

Law Offices of

PRIBANIC & PRIBANIC

A Limited Liability Company

1735 Lincoln Way

White Oak, Pennsylvania 15131

Tel. 412/672-5444

VICTOR H. PRIBANIC

Fax. 412/672-3715

PITTSBURGH OFFICE
513 COURT PLACE
PITTSBURGH, PA 15219
TEL. 412/281-8844

April 21, 2015

Bob Hilliard, Esquire
Hilliard Munoz Gonzales, L.L.P.
710 South Shoreline Blvd., Suite 500
Corpus Christi, TX 78401

RE: Nadia Yingling, Personal Representative of the Estate of James E.
Yingling v. General Motors, LLC
Our File No.: 9108

Dear Bob:

Enclosed is a Consent to Association which I think affords the necessary license to act in this matter which I take it relates primarily to the obvious need to maintain uniformity, avoid duplication of effort and ensure that each of the respective cases is thoroughly addressed while at the same time avoiding potentially conflicting theories, evidence, etc.

I certainly agree with your concerns in this area and I am happy to cooperate. As I mentioned during our phone call, I am not really used to anyone carrying my bags and certainly we are available and want to participate in the discovery strategizing and other aspects of preparation of our case and hopefully supply some useful input as to the others.

Our fee agreement permits this type of association without the signature of our client so the document enclosed executed by me is adequate for these purposes.

I do not know what the timing of the other injuries/deaths are but I did receive a nice package of materials from Doreen at Lance Cooper's office which described the information that we can demonstrate was clearly obtained by GM through the *Melton* case, including Lance's experts and so forth and which I would be happy to make available to the extent it is relevant in any of the other cases you are working on.

Thank you for your help with this and I look forward to working with you all.

Very truly yours,
/s/ Victor H. Pribanic
Victor H. Pribanic

VHP:lmw

Enclosure

cc: Rudy A. Gonzales, Jr., Esquire
Thomas J. Henry, Esquire
Matthew A Doeblor, Esquire

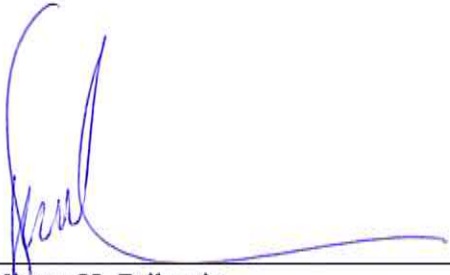
CONSENT TO ASSOCIATION

Pribanic & Pribanic, L.L.C. wishes to associate with Hilliard Munoz Gonzales LLP and Thomas J. Henry – Injury Attorneys as additional counsel as follows:

It is understood and agreed that this association shall be limited to discovery, including responding to written discovery requests, preparing for and prosecuting and defending depositions, preparation of discovery to be advanced to an opposing party and otherwise coordinating discovery responses and objections among the various actions pending against General Motors relating to the ignition switch litigation pending in the United States District Court for the Southern District of New York.

It is further understood that communication with the client and beneficiaries of the estate of James E. Yingling, III will be engaged in exclusively by Pribanic & Pribanic, L.L.C. or otherwise with the express consent and/or in the company of representative of Pribanic & Pribanic, L.L.C.

Dated: 4-21-15



Victor H. Pribanic

Dated: 04/27/15



Hilliard Munoz Gonzales L.L.P.

Dated: _____

Thomas J. Henry – Injury Attorneys

Exhibit 6

Law Offices of
PRIBANIC & PRIBANIC

A Limited Liability Company
1735 Lincoln Way
White Oak, Pennsylvania 15131

Tel. 412/672-5444

VICTOR H. PRIBANIC

Fax. 412/672-3715

PITTSBURGH OFFICE
513 COURT PLACE
PITTSBURGH, PA 15219
TEL. 412/281-8844

August 3, 2015

CONFIDENTIAL

Bob Hilliard, Esquire
Hilliard Munoz Gonzales, L.L.P.
710 South Shoreline Blvd., Suite 500
Corpus Christi, TX 78401

RE: Nadia Yingling, Personal Representative of the Estate of James E.
Yingling v. General Motors, LLC
Our File No.: 9108

Dear Bob:

I have been thinking of your kind offer to try this case with me. First, I want to thank you for, however it occurred, putting it first in line. It is obviously a tremendous opportunity for our client and a case that I absolutely relish the prospect of trying, albeit it with a bit of trepidation.

I trust that I can count on you as lead counsel for the personal injury cases in this MDL to assist in any way possible and after meeting you I am confident that I can do so but I am at a complete loss as to how both of us could try this case – I cannot see me second seating you anymore than you would want to second seat me in a trial. I have agonized over some way to split it up and I have no solution short of going it alone, with your good help, and that of my colleagues here at the office and putting my head down and getting to work immediately.

I hope your reaction to this is not to take any offense whatsoever – if it is – just think to yourself what would I do if I were in Victor's shoes and answer honestly and I expect you won't be able to take any umbrage at this choice whatsoever.

I hope to do the best job that 35 years in the courtroom will allow me to and pray for the strength and wisdom to get through this the best way possible for my client and all of your many many clients that will be affected in some way by the outcome.

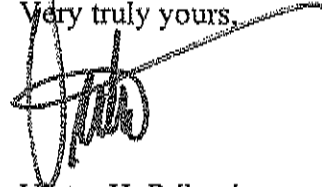
You are going to get to try one of these cases if you choose to no matter what – I only have this one and feel duty bound to do it.

Bob Hilliard, Esquire
August 3, 2015
Page 2 of 2

Again, I hope your feelings are not hurt by this and I hope we can remain, as we should, brothers in arms throughout this thing.

If you have some thoughts or want to discuss this, please give me a call.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'VHP', with a long, sweeping horizontal line extending to the right.

Victor H. Pribanic

VHP:lmw

Exhibit 7

FOR IMMEDIATE RELEASE

HILLIARD ANNOUNCES PARTIAL GM SETTLEMENT

CORPUS CHRISTI, Texas (September 17, 2015) Bob Hilliard, appointed by the Federal Judge in the GM MDL litigation to be the lead attorney for all personal injury and death cases caused by GM's defective ignition switch, announced today that, on behalf of 1,385 of his clients, he and GM, have sent a letter to Judge Furman advising that the parties have entered into a 'Memorandum of Understanding' whereby his clients may be eligible to participate in a settlement.

Hilliard states, "It is clear from Today's news regarding the 900 million dollar agreement between GM and the Department of Justice, and the deal we have negotiated for my clients that GM is determined to resolve parts of the ignition switch litigation where it feels it is most exposed."

"Lives were taken and families were devastated and there is no way to ever change that sad fact. Still, this agreement will allow some healing, as GM recognizes, through its payment of financial compensation, the needlessness of this enormous national tragedy."

"There remains, inside the MDL approximately 370 injury cases and 84 death cases. I look forward to continuing to aggressively help these victims find justice through the consolidated national litigation. Also, 6 cases will remain on the Court's trial docket, with the first jury trial to begin in January 2016. In 4 short months a Manhattan jury will be seated and will have an opportunity, through its verdict, to speak to GM's cover up and the human consequences of that cover up."

ABOUT HMG <http://www.hmglawfirm.com/>

Hilliard Muñoz Gonzales LLP (HMG) specializes in mass torts, personal injury, product liability, commercial and business litigation, and wrongful death. Hilliard Muñoz Gonzales LLP has been successfully representing clients in the United States and Mexico since 1986. Bob Hilliard obtained the Largest Verdict in the country in 2012 and the #1 verdict in Texas in 2013.

HMG is actively seeking to represent other victims of GM's defective vehicles.

SCHEDULE AN INTERVIEW WITH BOB HILLIARD

Contact Adolfo Martinez at 361-960-9619

End of text.

Exhibit 8

Subject: <no subject>

Date: Thursday, September 17, 2015 at 3:23:11 PM Central Daylight Time

From: Robert C. Hilliard

To: GM Executive Committee Group, GM Co-Lead Group

Team,

Last night GM and I signed an MOU regarding approx. 1385 cases I have.

Attached is the Press Release explaining generally the agreement.

Thanks,

Bob

ROBERT C. HILLIARD

-- Attorney at Law --

*Board Certified in Personal Injury
Trial Law & Civil Trial Law*

hmglawfirm.com

CONFIDENTIALITY NOTICE

This electronic mail transmission contains information which is confidential and privileged under the attorney-client communication privilege and/or the attorney work product doctrine and should be read or retained only by the intended recipient. If you have received this transmission in error, please immediately notify the sender and delete it from your system.