

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

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