

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

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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.