

# Exhibit 9

**Doreen Lundrigan**

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**From:** Victor Pribanic <vpribanic@pribanic.com>  
**Sent:** Friday, August 14, 2015 11:03 AM  
**To:** Doreen Lundrigan  
**Subject:** FW: Yingling #9108 - GM Ignition System Cases

> Victor H. Pribanic  
> Pribanic & Pribanic  
> 1735 Lincoln Way  
> White Oak, Pa 15131  
> (412) 672-5444  
vpribanic@pribanic.com

On 8/14/15, 10:54 AM, "Steve Berman" <Steve@hbsslw.com> wrote:

>My assistant is out can someone send one

>  
>

>Steve Berman | Hagens Berman Sobol Shapiro LLP | Direct: (206) 268-9320

>

>-----Original Message-----

>From: Cabraser, Elizabeth J. [mailto:ECABRASER@lchb.com]

>Sent: Friday, August 14, 2015 7:39 AM

>To: Steve Berman; Bob Hilliard

>Cc: Steve Shadowen; Thomas J. Henry; Michael E. Henry

>Subject: Re: Yingling #9108 - GM Ignition System Cases

>

>What's the conf Call schedule on this today?

>

>Sent from my BlackBerry 10 smartphone.

> Original Message

>From: Steve Berman

>Sent: Friday, August 14, 2015 7:32 AM

>To: Cabraser, Elizabeth J.; Bob Hilliard

>Cc: Steve Shadowen; Thomas J. Henry; Michael E. Henry

>Subject: RE: Yingling #9108 - GM Ignition System Cases

>  
>  
>Well said  
>  
>  
>Steve Berman | Hagens Berman Sobol Shapiro LLP | Direct: (206) 268-9320  
>  
>-----Original Message-----  
>From: Cabraser, Elizabeth J. [mailto:ECABRASER@lchb.com]  
>Sent: Thursday, August 13, 2015 11:02 AM  
>To: Bob Hilliard  
>Cc: Steve Berman; Steve Shadowen; Thomas J. Henry; Michael E. Henry  
>Subject: Re: Yingling #9108 - GM Ignition System Cases  
>  
>That is the crux of the bellwether issue:  
>Does the value-and legitimacy- of the MDL bellwether system derive from  
>priority trial of the "best" case, or the most representative case?  
>Most authorities say the latter. The keystone of any letter or motion  
>response the Co-Leads file should not be a "we're the Co-Leads, and  
>you're not" us vs them argument, but the point that the order of  
>bellwethers was derived to achieve the most common benefit out of the  
>exercise by Recognizing it's function: to have the experience of a  
>truly representative trial inform the entire litigation. Yingling is an  
>excellent death case-there is no argument about that. And it may well  
>be that, in a non-bellwether system, plaintiffs would make every effort  
>to have it tried first. But- New GM will argue that a Yingling  
>plaintiff's verdict is anomalous and will not inform values for the remaining cases.  
>There is no similar argument that the current #1 case is anomalous- your  
>statistics show that and should be centerpieces.  
>Sent from my BlackBerry 10 smartphone.  
>From: Robert C. Hilliard  
>Sent: Thursday, August 13, 2015 10:38 AM  
>To: Cabraser, Elizabeth J.  
>Cc: Steve Berman; Steve Shadowen; Cabraser, Elizabeth J.; Thomas J.  
>Henry; Michael E. Henry  
>Subject: Re: Yingling #9108 - GM Ignition System Cases  
>  
>  
>also:  
>  
>there are 1,910 cases in the mdl.  
>  
>1,855 have no black box download available. (97.1%)  
>  
>That means our current #1 case is a bellwether for 97.1% of the cases.  
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>ROBERT C. HILLIARD

>-- Attorney at Law --

>

>Board Certified in Personal Injury

>Trial Law & Civil Trial Law

>

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

>

>

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>it from your system.

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>On Aug 13, 2015, at 10:48 AM, Cabraser, Elizabeth J.

><[ECABRASER@lchb.com](mailto:ECABRASER@lchb.com)<<mailto:ECABRASER@lchb.com>>> wrote:

>

>My concern is that the (for shorthand) "no car" issue could get ruled

>on via SJ- and a bad ruling would then eliminated many cases

>

>Sent from my BlackBerry 10 smartphone.

>From: Steve Berman

>Sent: Thursday, August 13, 2015 8:45 AM

>To: Bob Hilliard; Cabraser, Elizabeth J.

>Subject: FW: Yingling #9108 - GM Ignition System Cases

>

>

>His letter is toned down

>

>What about the merits issue first case no car no download

>

>

>Steve Berman | Hagens Berman Sobol Shapiro LLP | Direct: (206) 268-9320

>

>From: Lisa Wilson [<mailto:lisa@pribanic.com>]

>Sent: Thursday, August 13, 2015 8:36 AM

>To: Bob Hilliard; Steve Shadowen; Steve Berman; Elizabeth Cabraser

>Cc: Matthew Doebler; Ernest Pribanic; Victor Pribanic

>Subject: Yingling #9108 - GM Ignition System Cases

>

>

>FROM VICTOR H. PRIBANIC, ESQUIRE

>

>

>Gentlemen and Ms. Cabraser,

>

> The Motion I mentioned yesterday is attached - please let  
>me know if we can discuss this today.

>

> Thank you for your attention.

>

>

>Victor

>

>

>DICTATED BUT NOT REVIEWED

>

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