

# Exhibit 4

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

GENERAL MOTORS LLC IGNITION SWITCH LITIGATION

14-MD-2543 (JMF)

*This Document Relates to All Actions*

Hon. Jesse M. Furman

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**DEFENDANT GENERAL MOTORS LLC’S CLAIMS FOR INCLUSION IN  
BELLWETHER TRIAL PLAN’S INITIAL DISCOVERY POOL**

Pursuant to MDL Order No. 25 ¶ 33 (14-MD-2543, Docket No. 422), General Motors LLC submits the following nine eligible Plaintiff’s claims for inclusion in the bellwether trial plan’s Initial Discovery Pool.

<b>Plaintiff</b>	<b>Associated Plaintiff<sup>1</sup></b>	<b>MDL 2543 Docket No.</b>	<b>Primary Counsel for Plaintiff(s)</b>
Barthelemy, Lawrence	Spain, Dionne	1:14-cv-05810	Hilliard Muñoz Gonzales LLP
Crook, Reubena	-	1:14-cv-08176	Hilliard Muñoz Gonzales LLP
Elbahou, Elias	-	1:14-cv-05810	Hilliard Muñoz Gonzales LLP
Gonzales, Isabel	Quintero, Frances J.	1:14-cv-08176	Hilliard Muñoz Gonzales LLP
Norville, Amy	-	1:14-cv-08176	Hilliard Muñoz Gonzales LLP
Reid, Robert	-	1:14-cv-05810	Hilliard Muñoz Gonzales LLP
Sharpe, Joan	-	1:14-cv-05810	Hilliard Muñoz Gonzales LLP
Storck, LeAnn	-	1:14-cv-08176	Hilliard Muñoz Gonzales LLP
Vindiola, Cecilia	-	1:14-cv-08176	Hilliard Muñoz Gonzales LLP

<sup>1</sup> Order No. 25 requires the parties to submit “nine (9) eligible Plaintiff’s claims” for inclusion in the Initial Discovery Pool. (See Order No. 25 ¶ 33.) Recognizing that more than one plaintiff may file a claim arising from a single incident, the parties have agreed that, for the purposes of Order No. 25 ¶ 33, any “claim” selected for inclusion in the Initial Discovery Pool shall include all bellwether-eligible claims arising from the same subject incident. Accordingly, certain proposed bellwether claims include the claims of “Associated Plaintiffs” who have filed claims—or on whose behalf claims have been filed—for the same respective subject incident and who also will be included in the Initial Discovery Pool.

Dated: February 17, 2015

/s/ Richard C. Godfrey, P.C.  
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*Attorneys for Defendant General Motors LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2015, I electronically served the foregoing pleading on all counsel of record in this action using the CM/ECF system.

/s/ Richard C. Godfrey, P.C. \_\_\_\_\_  
Richard C. Godfrey, P.C.