

Exhibit 8

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August 7, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: General Motors, LLC Ignition Switch Litigation
Docket: 14-MD-2543 (JMF), 14-MC-2543
CHANGE IN BELLWETHER TRIAL SCHEDULE

Dear Judge Furman

I represent James Yingling's wife Nadia and five children in *Yingling v. GM*, which is the case the parties have selected to be the first bellwether trial to commence on January 11, 2016. I am writing to express my objection to the modification of the bellwether trial schedule as proposed by Robert Hilliard, Esquire, et al, Lead Counsel for the personal injury cases in his letter dated August 5, 2015 (Document Number: 1229).

I was contacted by Mr. Hilliard's office approximately a year ago. In the call one of the persons Mr. Hilliard refers to as his "lieutenants" proposed that I associate Mr. Hilliard in *Yingling* and that I agree to share any fees earned. The proposal was declined.

Before the parties selected *Yingling* to be the first bellwether trial, as set forth in the bellwether trial schedule filed on July 27, 2015, I received a phone call from Mr. Hilliard advising me that he was considering selecting *Yingling* as the first bellwether trial. He also expressed an interest in "trying the case with me." I advised him that I had not considered trying the case with him and he indicated that he would come to visit me so that we could discuss it.

Mr. Hilliard, and the other Lead Counsel, did indeed select the *Yingling* as the first bellwether trial. On Thursday, July 28, 2015, Mr. Hilliard flew to Pittsburgh where I met him for dinner and, among other things, discussed the merits of *Yingling*. Mr. Hilliard never broached the notion that we try the case together nor discussed any terms during that meeting.

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On Sunday, August 1, 2015, I received a phone call from Mr. Hilliard, who told me he was thinking about how we could handle the lawyers' fee if we tried the case together. He proposed that as the result of any settlement that my law firm would retain all lawyers' fees - he then proposed if we began the trial some arrangement for dividing the fees thereafter should be made.

After considering Mr. Hilliard's proposal, I sent the attached letter to Mr. Hilliard via email and regular mail on August 3, 2015. Mr. Hilliard did not respond to my letter. The August 5, 2015 letter addressed to this Court requesting modification of the bellwether trials is the first contact from Mr. Hilliard since I submitted the attached letter to him. I am frankly surprised and disturbed at Lead Counsel's request.

I have done extensive work to prepare for the January 2016 trial. I have retained the necessary experts and submitted their reports. I have a detailed understanding of the issues presented. I understand, however, that the success of the first bellwether trial is not only important to my clients, it is also important to all MDL plaintiffs and their counsel, as well as State Court case plaintiffs and their counsel. With this in mind, I have associated Lance Cooper with The Cooper Firm and Cole Portis with the Beasley Allen firm to assist me in *Yingling*. This team of lawyers will give my clients the best opportunity to prevail in the first bellwether trial.

Of course, Your Honor chose to appoint Mr. Cooper to the Executive Committee. Given his work in *Melton v. GM*, Mr. Cooper has unique knowledge of, and experience with, GM in the ignition switch cases. The Beasley Allen firm brings to *Yingling* the experience and resources which few other plaintiffs' firms in the country can bring. In addition, Cole Portis of the Beasley Allen firm obtained a plaintiff's verdict in the first Toyota sudden acceleration case to go to trial, *Bookout v. Toyota*. The successful result in *Bookout v. Toyota* resulted in Toyota choosing to settle their remaining sudden acceleration cases. Simply put, there could be no better team to try the case for the Yingling family which, again, if successful, will only serve to benefit all plaintiffs.

Further evidence of Mr. Hilliard's acting in his own interests is the case Lead Counsel selected to now be the first bellwether trial — *Scheuer v. GM*. Although I do not profess to know all of the liability facts of *Scheuer*, the Plaintiff Fact Sheet in *Scheuer* says that there is no car available to inspect and there is no download of the SDM. I have always understood it is extremely important for the plaintiff to have the product to prove liability in a product liability case. In *Yingling*, we have both the vehicle and the download of the SDM.

In addition, the damages to Mr. Scheuer as described in the Plaintiff Fact Sheet appear to be primarily soft tissue injuries with \$5,000.00-\$10,000.00 in medical bills and a few months out of work. In contrast, Mr. Yingling was a 35 year old father who lingered 17 days with a profound brain injury and dying, left behind a wife and five children.

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Lead counsel chose *Yingling* as the first bellwether trial after months of deliberation and consideration. Your Honor appointed Lead Counsel to act in the best interests of all plaintiffs, not Lead Counsel. Lead Counsel, and Mr. Hilliard in particular, obviously chose *Yingling* to be the first bellwether trial because of its merits. Mr. Hilliard has apparently now changed his mind after learning that he would not be participating in the trial or sharing in any fees. Mr. Hilliard should not be permitted to tamper with the initial bellwether trial selection because his proposals were rebuked.

Very truly yours,

Victor H. Pribanic

VHP:lmw