

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re FORD MOTOR CO. SPEED)	ALL CASES
CONTROL DEACTIVATION SWITCH)	
PRODUCTS LIABILITY LITIGATION)	MDL DOCKET NO. 1718
)	
)	Judge Bernard A. Friedman
)	Magistrate Judge Steven Whalen

**FORD MOTOR COMPANY’S RESPONSE TO LEAD AND LIAISON COUNSEL’S
MOTION FOR FINAL DISTRIBUTION FROM COMMON BENEFIT FUND**

Plaintiffs’ Lead and Liaison Counsel filed a Motion for Final Distribution from Common Benefit Fund seeking, with respect to Lead Counsel, \$89,470.15 in fees and expenses incurred, and, with respect to Liaison Counsel, \$27,910.45 in fees and expenses incurred. (*See* Dkt. 645.) In total, Lead and Liaison Counsel request a distribution of \$117,380.60 from the Common Benefit Fund (the “Fund”).

Per the Clerk’s report dated August 3, 2012, the total amount in the Fund is \$47,956.60, plus \$3.00 in accrued interest, which means that the amount requested by Lead and Liaison Counsel exceeds the amount available in the Fund. Lead and Liaison Counsel have reached an agreement regarding how the Fund’s \$47,959.60 should be divided between them. (*Id.*) Ford respectfully requests that the Court’s order approve a distribution of only the amount in the Fund and that the order close the Fund after this final distribution has been made. Ford otherwise takes no position concerning Lead and Liaison Counsel’s request for this final distribution from the Fund or the manner in which it will be divided among Lead and Liaison Counsel.

Respectfully submitted,

Date: August 27, 2012

/s/ Timothy M. Kuhn
Andrew J. McGuinness, Esq.
drewmcguin@gmail.com
122 S Main St., Suite 118
P O Box 7711
Ann Arbor, MI 48107

Clay Guise (P59055)
cguise@dykema.com
Timothy Kuhn (P72246)
tkuhn@dykema.com
DYKEMA GOSSETT PLLC
400 Renaissance Center, 36th Floor
Detroit, MI 48243
(313) 568-6800

Attorneys for Defendant Ford Motor Company

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2012, I electronically filed the foregoing paper with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

/s/ Timothy M. Kuhn
Timothy Kuhn (P72246)
tkuhn@dykema.com
DYKEMA GOSSETT PLLC
400 Renaissance Center, 36th Floor
Detroit, MI 48243
(313) 568-6533