

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

GENERAL MOTORS LLC IGNITION  
SWITCH LITIGATION

No. 14-MD-2543 (JMF)

This Document Relates to:

*ALL ECONOMIC LOSS ACTIONS*

**NOTICE OF MOTION AND INTERIM CLASS COUNSEL'S RULE 23(h) MOTION  
FOR APPROVAL OF AWARD OF ATTORNEYS' FEES AND EXPENSES AND  
SERVICE AWARDS TO LEAD PLAINTIFFS**

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on **December 18, 2020, at 9:30 a.m.**, or as soon thereafter as the matter may be heard, a hearing will be held before the Honorable Martin Glenn, United States Bankruptcy Judge for the Southern District of New York, sitting jointly with the Honorable Jesse M. Furman, United States District Court Judge for the Southern District of New York, in the Courtroom of the Honorable Jesse M. Furman, located at 40 Centre Street, New York, NY 10007, or, subject to further order of the Courts, by telephone (the “Joint Hearing”). At the Joint Hearing, Interim Class Counsel will and hereby do move the Court under Fed. R. Civ. P. 23(h) for entry of an Order approving an award of attorneys’ fees and expenses of \$34,500,000 million for Plaintiffs’ counsels’ work in securing the Settlement and for service awards totaling \$310,000 to the Lead Plaintiffs.

This Motion is based on this Notice of Motion and Motion, the Memorandum in Support of this Motion, the Settlement Agreement and all Exhibits attached thereto, the Declaration of Steve W. Berman in Support of Interim Class Counsel’s Rule 23(h) Motion for Approval of Award of Attorneys’ Fees and Expenses and Service Awards to Lead Plaintiffs, the Declaration of Elizabeth J. Cabraser in Support of Interim Class Counsel’s Rule 23(h) Motion for Approval of Award of Attorneys’ Fees and Expenses and all exhibits thereto, the argument of counsel, all papers and records on file in this matter, and such other matters as the Court may consider.

Dated: September 28, 2020

**HAGENS BERMAN SOBOL SHAPIRO  
LLP**

By: /s/ Steve W. Berman

Steve W. Berman  
Sean R. Matt  
Andrew M. Volk  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
seam@hbsslaw.com  
andrew@hbsslaw.com

*Interim Class Counsel*

Respectfully submitted,

**LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP**

By: /s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008  
ecabraser@lchb.com

Rachel Geman  
250 Hudson Street, 8th Floor  
New York, NY 10013  
Telephone: (212) 355-9500  
Facsimile: (212) 355-9592  
rgeman@lchb.com

*Interim Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic filing service on September 28, 2020, which will send notification of such filing to the e-mail addresses registered.

*/s/ Steve W. Berman*

\_\_\_\_\_  
Steve W. Berman