



Mary Livingston  
Phone: [REDACTED]  
Email: mary.livingston@gm.com

GENERAL MOTORS LLC  
LEGAL STAFF  
Mail Code: 482-028-205  
P.O. Box 400  
Detroit, MI 48265-4000

February 28, 2020

***Attorney Work Product  
Privileged and Confidential***

Mary Arens, Esq  
Erskine Law Group PC  
3995 E. La Palma Ave.  
Anaheim, CA 92807

Re: [REDACTED]  
[REDACTED] *v. General Motors LLC*

Dear Ms. Arens:

This will acknowledge your agreement to represent General Motors in this case.

This case is not part of the Early Resolution Program; however, the Business Resource Center (BRC) will furnish you with a copy of all relevant files. Please forward your written recommendation directly to me, setting forth: (1) the present settlement demand from the plaintiff; (2) your evaluation of that demand; (3) your initial overall settlement recommendation, including your best estimate of how much it will take to settle the case; and (4) your present evaluation of the chances and potential range of an adverse judgment. Please include in your evaluation the total amount you roughly anticipate it will cost General Motors for attorney fees and disbursements through final resolution of this matter, including trial if necessary.

Please make certain to provide Legal Staff with your firm's proposed pleadings, including the Answer to the Complaint, and discovery responses for review and approval before filing with the court and/or serving upon opposing counsel. Once approved, please provide Legal Staff with the as-filed version of the pleadings and discovery.

Information necessary to support your preliminary settlement evaluation should not be obtained through formal discovery procedures. Rather, it is suggested that pertinent information such as vehicle mileage, out-of-pocket expenses, repair history, continuing complaints, etc., can be obtained from the BRC and plaintiff's attorney.

It is also important that you advise us of the names of any of your firm's **new** timekeepers who will be working on this case. On all written communication, please be sure to include the GM Case Name and Case Number. Feel free to contact me with any questions.

During the management of this matter if you have concern that the plaintiff's product allegation, GM's engineering assessment, or your own technical analysis of this case raises a potential safety-related issue, please take that concern promptly to me, the Executive Director of Product Litigation, the North American General Counsel, or the General Counsel. We expect our outside

Ms. Mary Arens, Esquire

February 28, 2020

Page 2

counsel to be partners in identifying and elevating issues that may impact product safety. Your attention to this will help GM set the industry standard with respect to customer safety.

Sincerely,

Mary Livingston