

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:

GENERAL MOTORS LLC
IGNITION SWITCH LITIGATION

This Document Relates to the Plaintiffs in the Actions
Listed on the Attached Exhibit A

No. 14-MD-2543 (JMF)

~~No. 14-MC-2543 (JMF)~~

Hon. Jesse M. Furman

MOTION FOR ORDER PERMITTING SUBMISSION OF MEMORANDUM AND
DECLARATION IN SUPPORT OF MOTION TO WITHDRAW
UNDER SEAL AND IN CAMERA

Hilliard Martinez Gonzales (formerly Hilliard Muñoz Gonzales) and Thomas J. Henry
Injury Attorneys (together hereinafter the "Firms"), respectfully request an Order permitting the
Firms to file their Memorandum in Support of the Firms' Motion to Withdraw as Counsel and
Declaration in Support of the Firms' Motion to Withdraw as Counsel, under seal and in camera.
Because the Memorandum in Support and Declaration reflect both confidential and attorney-client
privileged information and attorney opinion work product, the Firms respectfully request that the
Court permit the Firms to submit the Declaration under seal and in camera (that is, filing under
seal and submission to the Court by email without disclosure to any other parties). The Firms have
filed a Memorandum in Support of this Motion.

Dated: December 6, 2019

Respectfully submitted,

Application GRANTED. The Clerk of Court is
directed to docket this in 14-MD-2543, 14-CV-6924,
and 15-CV-5528. The Clerk of Court is further
directed to terminate 14-MD-2543, ECF No. 7578;
14-CV-6924, ECF No. 334; and 15-CV-5528, ECF
No. 169. SO ORDERED.

/s/ Robert C. Hilliard
HILLIARD MARTINEZ GONZALES LLP
Robert C. Hilliard
bobh@hmglawfirm.com
719 S. Shoreline Boulevard
Corpus Christi, TX 78401
Telephone No.: (361) 882-1612
Facsimile No.: (361) 882-3015

[Handwritten signature]
December 9, 2019

-and-

/s/ Thomas J. Henry

THOMAS J. HENRY INJURY ATTORNEYS

Thomas J. Henry

tjh@tjhlaw.com

521 Starr St.

Corpus Christi, Texas 78401

Telephone No.: (361) 985-0600

Facsimile No.: (361) 985-0601

*Attorneys for Plaintiffs*