

LAW FIRM OF

[REDACTED] LLP

[REDACTED]
[REDACTED]
[REDACTED]

TELEPHONE [REDACTED]
FACSIMILE [REDACTED]

January 23, 2007

**FOR MEDIATION AND
SETTLEMENT
PURPOSES ONLY –
CALIFORNIA EVIDENCE
CODE SECTIONS 1119, 1152**

VIA FACSIMILE ([REDACTED]) AND U.S. MAIL

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Re: Signer Buick-Cadillac

Dear [REDACTED]

I am writing in response to your client's recent correspondence, which includes a demand for a large monetary settlement, among other things.

After your client made this demand, I understand that you contacted [REDACTED] of the GM Legal Staff on your client's behalf. I have been retained to represent GM in this matter, and so am delivering this response to you. Please direct all further correspondence in connection with this matter to me and Deborah F. Collins of the GM Legal Staff who, as you may know, has had extensive discussions with Mr. Signer. Because it appears that he is expecting her to respond, I have taken the liberty of asking her to provide a copy of this letter directly to him via e-mail.

The documents Mr. Signer has provided make it clear that our clients have had a long relationship. You are certainly aware that the marketplace has changed dramatically in these past twenty-five years and will continue to do so. It is to our clients' mutual benefit to stay in front of and adapt positively to these changes going forward.

That is not, however, what your client is proposing. Instead, he claims GM ought to critique its network planning back several decades through the infallible lens of 20/20 hindsight and then compensate your client based on the hypothetical results of a “best case scenario” if our clients had made different decisions. I understand that the GM Legal Staff and senior VSSM management have conducted the review of his position that your client requested. As a result of that review, please be advised that GM believes there is no merit to your client’s legal claims and therefore respectfully declines his settlement proposal.

Nonetheless, the upcoming mediation that your client has requested will provide an opportunity for a full discussion. Ideally, this discussion could point the way toward resumption of a positive business relationship going forward. That is certainly GM’s hope.

Very Truly Yours,

[REDACTED]
[REDACTED]
[REDACTED] LLP