

# **Exhibit 16:**

**Initial Press Release**

**If You Owned or Leased a GM Vehicle that was Subject to Certain 2014 Recalls, You May Have Rights and Choices in a Proposed Settlement.**

Seattle, WA, Month x, 2020/JND Legal Administration

A proposed class settlement of economic loss claims by persons who owned or leased certain GM vehicles that were recalled in 2014 has been submitted for approval to the federal district court. The recalls involved the ignition system, key rotation, electronic power steering and/or side airbag wiring. Plaintiffs claim that consumers overpaid when they bought or leased these vehicles. General Motors LLC (“New GM”) and the Motors Liquidation Company GUC Trust (“the GUC Trust”) deny these allegations. Plaintiffs, the GUC Trust and New GM have agreed to a settlement to avoid the risk and cost of further litigation.

The proposed settlement class includes all persons (individuals, businesses and organizations) who, at any time on or before GM’s announcement of the 2014 recalls, owned, purchased, or leased a vehicle subject to any of the recalls in the United States, or its territories and/or possessions. Daily rental fleet businesses, governmental entities and certain other persons are not included in the class. Go to [www.XXXXXXXXXXXXX.com](http://www.XXXXXXXXXXXXX.com), or call 1-8xx-xxx-xxxx, to see if your GM vehicle is covered by the settlement.

If approved, the settlement fund will be **\$120 million**. Payment amounts to eligible class members will vary depending on which recall applied to their vehicle, settlement implementation costs, and the number of class members who file claims.

For details about the settlement, including the money that may be available to class members, and your eligibility to file a claim and receive a payment, review the Long Form Notice and the Settlement Agreement available at [add website]. All claims must be submitted online or by mail before the deadline which will be posted on the website, which will be no earlier than \_\_\_\_\_.

Class members have other options too. If you want to keep your right to sue New GM, the GUC Trust and other parties about the economic loss claims, you must exclude yourself from the class. If you exclude yourself, you cannot receive benefits provided by the settlement. Your exclusion request must be postmarked by \_\_\_\_\_, **2020**. **IF YOU DO NOT EXCLUDE YOURSELF AND THE SETTLEMENT IS APPROVED, YOU WILL BE BOUND BY THE RELEASE, WAIVER AND COVENANT NOT TO SUE.** If you stay in the class, you may object to the settlement – that is, tell the Court why you don’t like the settlement. Your objection must be filed by \_\_\_\_\_, **2020**. Information about how to exclude yourself or object to the settlement is available on the website. The District Court will hold a hearing on \_\_\_\_\_, **2020 at \_\_\_\_\_** to consider whether to approve both the settlement and attorneys’ fees and expenses (up to a maximum of \$34.5 million). The attorneys’ fees and expenses will not be deducted from the settlement fund. You may appear at the hearing, either yourself or through an attorney hired by you, but you do not have to. For more information, call **1-8xx-xxx-xxxx** or visit **www.\_\_\_\_\_.com**.