

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

NOTICE OF CLASS ACTION SETTLEMENT

You May Be a Class Member Entitled to a Cash Payment of No Less Than \$2,149 If You Purchased or Leased a Model Year 2011-2014 Chevrolet Avalanche, Silverado, Suburban, or Tahoe, or a Model Year 2011-2014 GMC Sierra, Yukon, or Yukon XL Vehicle Equipped with a Generation IV LC9 5.3 Liter V8 Vortec 5300 Engine in California, Idaho, or North Carolina.

Siqueiros et al. v. General Motors LLC, No. 3:16-cv-07244-EMC (N.D. Cal.)

A federal court authorized this Notice. It is not a solicitation from a lawyer.

THIS NOTICE CONCERNS YOUR LEGAL RIGHTS, WHICH ARE AFFECTED WHETHER YOU ACT OR DON'T. PLEASE READ IT CAREFULLY.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS	
North Carolina Identification Forms Only By August 8, 2025	If you received a North Carolina Class Member Identification Notice by mail or email instructing you to identify that you are a Class Member, you must complete the form by August 8, 2025 to be eligible to receive a payment. If you are unsure what notice you received and what action, if any, you need to take, you can verify using the “North Carolina Class Member Identification Form” link at www.GMEngineLitigation.com by entering your Notice ID.
Do Nothing	If you did not receive a North Carolina Class Member Identification Notice, you will receive a direct payment and give up certain rights. By doing nothing, you will stay in the Class and, if the Settlement is approved, you will receive a <i>pro rata</i> share of a \$150,000,000 settlement. You will give up any right you may have to sue the defendant separately regarding any Claims that this Settlement resolves.
Object By August 8, 2025	Tell the Court why you believe the proposed Settlement is unfair, unreasonable, or inadequate. You may mail to the Court a written objection, postmarked no later than August 8, 2025, and/or request to appear at the Final Approval Hearing on October 2, 2025, at 1:30 p.m. PT, to tell the Court why you believe the proposed Settlement is unfair, unreasonable, or inadequate.

This notice summarizes the proposed Settlement between plaintiffs in the lawsuit and the defendant, General Motors, LLC (“GM”). For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.GMEngineLitigation.com. **Please read the remainder of this Notice for more detailed information about how to exercise your rights.**

Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

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Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

1. Why is there a Notice?

You have the right to know about a proposed Settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the Settlement.

Judge Edward M. Chen of the United States District Court for the Northern District of California is overseeing this lawsuit (the “Court”). The lawsuit is known as *Siqueiros et al. v. General Motors LLC*, and the case number is 3:16-cv-07244-EMC. If you have received a notice, records of state departments of motor vehicles show that you may have purchased or leased a Class Vehicle in California, Idaho, or North Carolina.

The “Class Vehicles” are: 2011-2014 Chevrolet Avalanches, 2011-2014 Chevrolet Silverados, 2011-2014 Chevrolet Suburbans, 2011-2014 Chevrolet Tahoes, 2011-2014 GMC Sierras, 2011-2014 GMC Yukons, and the 2011-2014 GMC Yukon XLs with LC9 engines and manufactured on or after February 10, 2011 (“LC9 Engines”). Any vehicle that has already received adequate piston replacement (*i.e.*, upgraded piston rings) under warranty and at no cost is excluded from the Class.

2. What is this lawsuit about?

Plaintiffs allege that the LC9 Engines in the Class Vehicles contain an inherently defective piston assembly and that the defect causes excessive engine wear in every Class Vehicle. Plaintiffs allege that excessively worn piston rings leads to excessive oil consumption, which causes spark plug fouling, rough idling, rough acceleration, check engine light activation, engine shutdown commands from the instrument cluster, oil loss/burn and may eventually lead to permanent engine damage or shutdown.

Plaintiffs further allege that GM was aware of the alleged defect and they seek to recover economic damages. Plaintiffs are not pursuing claims for personal injuries or damage to other property.

GM denies any wrongdoing or liability for the claims alleged and specifically denies that any Class Vehicle is defective.

3. Why is this a class action?

In a class action lawsuit, people called the “Class Plaintiffs” sue on behalf of themselves and other people who have similar claims. All of the people together are called a “Class” or “Class Members.” The company the Class Plaintiffs have sued, General Motors LLC (“GM”), is called the Defendant. One court resolves the issues for everyone in the Classes, except for those people who previously excluded themselves from the Classes.

4. What has happened in this lawsuit so far?

The Court held a jury trial on the Class’s claims in September and October 2022. The jury reached a verdict in Plaintiffs’ favor on each of the claims and awarded each class member \$2,700 in damages. The Court has denied GM’s motions to overturn the jury’s verdict but had not yet entered final judgment on the verdict before the parties agreed to a settlement.

5. Why is there a Settlement?

GM denies that it did anything wrong and was prepared to appeal the jury’s verdict. The parties have agreed to a Settlement, which will allow both sides to avoid the risk of an appeal and cost of further litigation.

Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

WHO IS IN THE SETTLEMENT

6. How do I know if I am part of the Settlement?

The Court certified three Classes in this case and defined the Classes as follows:

- **California Class.** All current owners or lessees of a Class Vehicle that was purchased or leased in new condition in the State of California as of May 23, 2022.
- **North Carolina Class.** All current owners or lessees of a Class Vehicle that was purchased or leased in the State of North Carolina as of May 23, 2022.
- **Idaho Class.** All current owners or lessees of a Class Vehicle that was purchased or leased from a GM-authorized dealer in the State of Idaho as of May 23, 2022.

The **Class Vehicles** are 2011-2014 Chevrolet Avalanches, 2011-2014 Chevrolet Silverados, 2011-2014 Chevrolet Suburbans, 2011-2014 Chevrolet Tahoes, 2011-2014 GMC Sierras, 2011-2014 GMC Yukons, and the 2011-2014 GMC Yukon XLs with LC9 engines manufactured on or after February 10, 2011. Any vehicle that has already received adequate piston replacement (*i.e.*, upgraded piston rings) under warranty and at no cost is excluded from the Classes.

Also excluded from all of the Classes are: GM; any affiliate, parent, or subsidiary of GM; any entity in which GM has a controlling interest; any officer, director, or employee of GM; any successor or assign of GM; and any judge to whom this Action is assigned, and his or her spouse; individuals and/or entities who validly and timely opted-out of the previously certified classes; and current or former owners of a Class Vehicle who previously released their claims in an individual settlement with GM which claims would otherwise be covered by the Release in this Action.

7. I am still not sure if I am included.

If you are not sure whether you are a Class Member, or have any other questions about the Settlement, you should visit the Settlement Website, www.GMEngineLitigation.com, or call the Settlement Administrator toll-free at 1-888-307-8239. Do not call the Court.

WHAT ARE THE TERMS OF THE SETTLEMENT?

8. What types of relief does the Settlement provide?

The Settlement provides monetary relief to all Class Members. All Class Members will be entitled to a *pro rata* share of a \$150,000,000 Settlement Amount. The amount that each Class Member will receive will depend on the final number of North Carolina Class Members.

Prior to the payment of any settlement expenses, including the costs of class notice and administration, and any attorneys' fees and costs as may be awarded by the Court, each Class Member's share of the Settlement Amount will be no less than \$2,700—the amount of damages awarded by the jury.

After payment of any and all settlement expenses, including the costs of class notice and administration, and any attorneys' fees and costs as may be awarded by the Court, it is estimated that no Class Member will receive less than \$2,149.

Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

9. How do I get a payment?

If you received a mailed or email notice that does not ask you to complete the North Carolina Identification Form, you are entitled to a direct payment, and you do not need to file a claim or take any further action. You will receive a direct payment from the Settlement Administrator. If you have not provided a W-9 to the Settlement Administrator, you may still do so on the Settlement Website or by mail. Failure to provide a completed Form W-9 will result in a Federal Income Tax backup withholding of 24%. To avoid potential tax complications down the line, it is strongly in your best interest to submit a completed W-9 form.

IMPORTANT: If you received Notice to complete the North Carolina Class Member Identification Form and meet the Class definition for a North Carolina Class Member, you must complete the North Carolina Class Identification Form in order to receive a payment. To complete the form online or to download a form, visit www.GMEngineLitigation.com. You must complete the form, and it must be postmarked or received no later than **August 8, 2025**.

If you are unsure what notice you received, enter the Notice ID found on your Notice to verify what action you need to take, if any, to receive your payment.

10. What am I giving up to get a payment?

If you are a Class Member and did not previously exclude yourself from the lawsuit, you cannot sue, continue to sue, or be a part of any other lawsuit against GM for claims released in this settlement. It also means that all decisions by the Court in this case will bind you.

The Released Claims and Releasees are defined in the Settlement Agreement. The Released Claims relate to the Oil Consumption Defect alleged in the lawsuit, and defined in the Settlement Agreement. Both the Settlement Agreement and the operative complaint are available on the Settlement Website, www.GMEngineLitigation.com. The Released Claims do not include claims for deaths, personal injury, or damage to tangible property other than a Class Vehicle.

PARTICIPATING IN THE SETTLEMENT

11. How do I update my contact information?

If you received a mailed or email notice and would like to update your contact information, you must contact the Settlement Administrator at info@GMEngineLitigation.com, call 1-888-307-8293, or mail to:

GM 5300 LC9 Class Action
P.O. Box 5124
Baton Rouge, LA 70821

12. How do I provide an IRS Form W-9?

If you received a notification from the GM 5300 LC9 Class Action Administrator and have not provided a copy of an IRS Form W-9, please either (a) visit the Settlement Website, www.GMEngineLitigation.com, and submit your form online, or (b) print, fill out, and mail the form to the Settlement Administrator at the following address: GM 5300 LC9 Class Action, P.O. Box 5124, Baton Rouge, LA 70821. The deadline for submitting is August 8, 2025. Failure to provide a completed Form W-9 will result in a Federal Income Tax backup withholding of 24%. Due to the anticipated

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value of Settlement Payments, the Settlement Administrator will be required by IRS regulations to issue a Form 1099 whether or not you complete a Form W-9. To avoid potential future tax complications, it is in your best interest to submit a completed Form W-9.

13. When will I get a payment?

Settlement Payments will be made after the Final Effective Date, as defined in the Settlement Agreement. This will be after the Court grants “final approval” to the Settlement, and after any appeals are resolved. If the Court approves the Settlement, there may be appeals. It is always uncertain when these appeals will be resolved and resolving them can take time.

14. Do I need to make a claim to receive a payment?

If you received a mailed or email notice that does not ask you to complete the North Carolina Identification Form, you are entitled to a direct payment, and you do not need to file a claim or take any further action. You will receive a direct payment from the Settlement Administrator.

IMPORTANT: If you received Notice to complete the North Carolina Class Member Identification Form and meet the definition for a North Carolina Class Member, you must complete the North Carolina Class Identification Form in order to receive a payment. To complete the form online or to download a form, visit www.GMEngineLitigation.com. You must complete the form, and it must be postmarked or received no later than **August 8, 2025**.

If you are unsure what notice you received, enter the Notice ID found on your Notice to verify what action you need to take, if any, to receive your payment.

EXCLUSION

15. Can I get out of the Settlement?

If you previously did not exclude yourself from the Action after the notice sent to the Class in May 2022, you cannot now exclude yourself from the Settlement Class and will not retain any individual rights you have against GM and will have “released” it from any of the Released Claims. As a Settlement Class Member, you can object to the Settlement if you do not like it.

If you previously requested to be excluded after the notice sent to the Class in May 2022, you are not a part of the Classes and will not be eligible to receive compensation under the Settlement, as described above. You also may not object to the Settlement if you previously requested to be excluded.

16. If I did not previously exclude myself, can I sue GM for the same thing later?

No. Unless you previously excluded yourself from the Action, you have given up any right to sue GM for the claims that this Settlement resolves (*i.e.*, those claims defined in the Settlement Agreement as the “Released Claims”). If you properly excluded yourself from the Action as part of the notice sent to the Class in May 2022, you will not be bound by any orders or judgments entered in the Action relating to the Settlement.

17. If I previously excluded myself, can I still get a payment?

No. You will not get any money from the Settlement if you previously excluded yourself from this Action.

Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

18. How do I tell the Court if I do not like the Settlement?

If you are a Class Member, you can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no Settlement Payments will be sent out, and the lawsuit will continue.

Any objection to the proposed Settlement must be in writing. If you submit a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must include:

- (a) the name and case number of this lawsuit: *Raul Siqueiros, et al. v. General Motors LLC*, No. 3:16-cv-07244-EMC (N.D. Cal.);
- (b) your full name, current residential address, mailing address (if different), email address and phone number;
- (c) an explanation of your objection, including the make, model year, and VIN(s) of the Class Vehicle(s), and whether the Class Vehicle is currently owned or currently leased by the Class Member;
- (d) whether the objection applies only to you, to a specific group within the Class, or to the entire Class. You must also include all reasons for the objection, any legal support for it, and any documents or other evidence you believe supports your objection;
- (e) copies of any documents you wish to submit in support;
- (f) the full name, telephone number, mailing address, and e-mail address of counsel representing you, including any former or current counsel who may be entitled to compensation for any reason related to the objection to the Settlement Agreement, the request for Attorneys' Fees and Expenses, and/or the requested Service Awards to the Class Plaintiffs;
- (g) a statement of whether you intend to appear at the Final Approval Hearing, either with or without counsel;
- (h) the identity of all counsel (if any) who will appear on your behalf at the Final Approval Hearing and all persons (if any) who will be called to testify in support of the objection;
- (i) if the objecting Class Member intends to appear, in person or by counsel, at the Final Approval Hearing, the objecting Class Member must so state in the objection. Any Class Member who does not state his or her intention to appear in accordance with the applicable deadlines and other specifications, or who has not filed an objection in accordance with the applicable deadlines and other specifications, will be deemed to have waived any objections to the Settlement and can be barred from speaking or otherwise presenting any views at the Final Approval Hearing;
- (j) your handwritten signature and date of signature (an electronic signature or attorney's signature is not sufficient), in addition to the signature of any attorney representing you in connection with the objection, and the date of the objection.

Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

- a. In addition, you must provide a list of any other objections you've submitted, or your counsel has submitted, to any class action settlements in any court in the United States in the previous five (5) years including the caption and case number of each case in which the objector has made such objection and the caption and case number of any related appeal, and a copy of any orders related to or ruling upon the objector's prior such objections that were issued by the trial and appellate courts in each listed case. If the Class Member or his or her counsel has not made any such prior objection, the Class Member shall affirmatively so state in the written materials provided with the objection.

Objections must be mailed to the Clerk of the Court at the following address postmarked on or before **August 8, 2025**:

Mark B. Busby, Clerk of the Court
Office of the Clerk
United States District Court
450 Golden Gate Avenue San Francisco, CA 94102-3489
Re: *Raul Siqueiros, et al. v. General Motors LLC*, No. 3:16-CV-07244-EMC

If you previously excluded yourself from the Action, you have no basis to object to the Settlement because it no longer affects you.

THE ATTORNEYS REPRESENTING YOU

19. Do I have an attorney in this case?

Yes. The Court has appointed Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., and DiCello Levitt LLP as Class Counsel. The lawyers will be compensated from the Settlement Fund, in an amount to be determined by the Court. If you want to be represented by your own lawyer, you may hire one at your own expense.

20. How will the attorneys be paid?

Class Counsel spent over eight years prosecuting this matter on a purely contingent fee basis, and advanced the expenses of the litigation, in the expectation that they would receive a fee, and have expenses reimbursed, only if there was a benefit created for the Class.

Class Counsel will file a motion on or before July 7, 2025 seeking an award of up to thirty-eight percent (38%) of the Settlement Fund in fees, and reimbursement of case expenses. Class Counsel will also seek on behalf of the Class Representatives service awards of thirty thousand dollars (\$30,000) each for a total of ninety thousand dollars (\$90,000). The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

After Class Counsel's motion for attorneys' fees, expenses, and service awards is filed on or before July 7, 2025, it will be posted on the Settlement Website, www.GMEngineLitigation.com, and you will have an opportunity to review and comment on the motion via an Objection.

THE COURT'S FINAL APPROVAL HEARING

21. When and where will the court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing (sometimes called a "fairness hearing") on October 2, 2025, at 1:30 p.m. PT. **PLEASE NOTE THAT the date of the final approval hearing date may**

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change without further notice to the Class. It is strongly advised to check the Settlement Website or the Court's PACER site to confirm that the date has not been changed.

At the Final Approval Hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider how much to award to Class Counsel and the Class Representatives. If there are objections, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Settlement.

22. Do I have to come to the hearing?

No. Class Counsel will answer any questions that the Court may have, but you may come at your own expense. If you submit an Objection, you do not have to come to the Court to talk about it. As long as you filed or mailed your written objection to the proper addresses, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

23. May I speak at the hearing?

Yes. You may appear and speak at the Final Approval Hearing. Class Members who wish to appear are requested, but not required, to mail to the Court a Notice of Intent to Appear.

For objecting Class Members who are represented by an attorney, the attorney must file with the Court a notice of appearance and Points and Authorities in support of the objection, which shall contain any and all legal authority upon which the objector will rely and confirm whether the attorney intends to appear at the Final Approval Hearing. Copies of these documents must be filed with the Court and delivered to Class Counsel and Defendants' Counsel no later than **August 8, 2025**.

If you previously excluded yourself from the Action, however, you may not appear and be heard.

WHAT HAPPENS IF YOU DO NOTHING?

24. What happens if I do nothing?

If you do nothing, you will be a member of the Class and will be bound by the release of Claims in this Settlement, and you will be issued a Settlement Payment.

IMPORTANT: If you receive a notice by mail or email to complete the North Carolina Class Member Identification Form, and timely complete the form, you may be issued a Settlement Payment. Unless you previously excluded yourself, if the Settlement is approved, you will not be able to start a lawsuit, or be part of any other lawsuit, against GM relating to the claims alleged in this case.

WHERE CAN I GET MORE INFORMATION?

25. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement and in case documents, which are available at www.GMEngineLitigation.com. If you have additional questions, you can visit the Settlement Website or contact the Settlement Administrator. You may also access the Court's docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>; or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

Any questions? Visit www.GMEngineLitigation.com or call 1-888-307-8239.

Court-Appointed Class Counsel

Adam J. Levitt DICELLO LEVITT LLP Ten North Dearborn Street, Sixth Floor Chicago, Illinois 60602 Telephone: 312-214-7900 alevitt@dicellolevitt.com	H. Clay Barnett, III BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C. 272 Commerce Street Montgomery, Alabama 36104 Telephone: 334-269-2343 Clay.Barnett@BeasleyAllen.com
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Settlement Administrator

GM 5300 LC9 Class Action
P.O. Box 5124
Baton Rouge, LA 70821

**PLEASE DO NOT CALL OR WRITE THE COURT, THE COURT CLERK, OR GENERAL
MOTORS ABOUT THE CLASS ACTION OR THE LITIGATION PROCESS.**

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