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Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RAUL SIQUEIROS, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**PLAINTIFFS’ SUPPLEMENTAL
STATEMENT IN SUPPORT OF
PLAINTIFFS’ MOTIONS FOR FINAL
APPROVAL AND ATTORNEYS’ FEES,
EXPENSES, AND SERVICE AWARDS**

Hon. Edward M. Chen

Following the completion of Class Notice and the deadline for Class Member objections, Class Counsel now respectfully submits this supplemental statement in further support of Plaintiffs' Motions for Final Approval of Settlement ("Final Approval Motion") and Attorneys' Fees, Expenses, and Class Representative Service Awards ("Fee and Expense Motion"). ECF Nos. 726, 727. For the reasons set forth below, the Court should confirm its preliminary finding that the Settlement is fair, reasonable, and adequate; finally approve the Settlement; and award attorneys' fees and expenses in the requested amount of \$57,000,000 ("Fee Request"), along with service awards of \$30,000 each to Plaintiffs Tarvin, Del Valle, and Davis.

I. The Reaction of the Class to the Proposed Settlement Is Overwhelmingly Positive.

As demonstrated in Plaintiffs' Final Approval Motion, each of the Rule 23 and Ninth Circuit factors weigh in favor of approval of the Settlement. ECF No. 726, § IV. The Settlement was vigorously negotiated at arm's length, is fair, reasonable, and adequate, and the lack of objections supports final approval. *Id.*; *see also Franco v. E-3 Sys.*, 2021 WL 2333851, at *5 (N.D. Cal. June 8, 2021) ("The lack of any objections to or requests for exclusion from the proposed settlement—during the notice period or at the final fairness hearing—supports final approval.") (citing *DIRECTV*, 221 F.R.D at 528-529).

Here, Class Notice was directly mailed to 42,979 Settlement Class Members (99.7% of all Class Members), of which 24,744 were mailed a Direct Payment Notice and 18,235 were mailed an Identification Notice. *See* Supplemental Declaration of Ryan Aldridge Re: Notice Plan Implementation and Settlement Administration ("Suppl. EisnerAmper Decl.") ¶¶ 5, 8-10, 18. In addition, the Settlement Administrator, EisnerAmper, sent supplemental mailings to 202 Class Members for which the initial Postcard Notice was undeliverable. *Id.* ¶ 10. Through the direct mailings alone, the Class Notice effectively reached 98.3% of all Class Members. *Id.* ¶ 18. Class Notice was also sent via e-mail and text message to Class Members where valid e-mail addresses and cell-phone numbers were available. In total, EisnerAmper successfully delivered a total of 22,222 e-mail notices and 20,211 text message notices, including reminder notices to Class Members who received the North Carolina Identification Notice. Suppl. EisnerAmper Decl. ¶¶ 5-7, 11-12, 18. Concurrent with the direct notice outreach, digital notice publications generated

3,674,053 digital impressions, 1 million more than originally anticipated. Suppl. EisnerAmper Decl. ¶ 13; *see also* ECF No. 722-1, Declaration of Brandon Schwartz Regarding Proposed Digital Notice to North Carolina Class Members Receiving Identification Notice, ¶¶ 5-6. The Settlement Website was *viewed 13,847 times* by unique visitors. *Id.* ¶ 15. On July 28, 2025, Class Counsel and EisnerAmper issued another wave of digital notice via text message, email, and social media to increase Identification Form submissions from potential North Carolina Class Members. *Id.* ¶¶ 11-13.

As of August 11, 2025, EisnerAmper has received 2,911 Identification Forms from potential North Carolina Class Members, 2,594 of which are eligible for Settlement Payments. *Id.* ¶ 19. EisnerAmper continues to analyze and intake any additional, timely submitted Identification Forms mailed to the P.O. Box.

Following EisnerAmper’s robust notice efforts, ***not a single objection to the substantive terms of the Settlement itself, Plaintiffs’ Fee and Cost Request, or the service awards has been made.*** *Id.* ¶ 20. Under these circumstances, there can be no doubt that this overwhelmingly positive reaction to the Settlement strongly supports granting final approval of the Settlement, as well as Plaintiffs’ Fee Request and Service Awards to the Class Plaintiffs.

II. Plaintiffs’ Fee Request Should Be Granted.

For the reasons detailed in Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Fee and Expense Motion and the Joint Declaration and accompanying exhibits, which Plaintiffs incorporate herein, the Fee Request is reasonable and should be awarded. ECF No. 727, §§ II-III; ECF Nos. 728–728-2.

For over 8 years, Class Counsel litigated this vigorously contested matter through rounds of motion practice and extensive discovery, obtained a full jury verdict in Plaintiffs’ favor at a Class trial, and engaged in extensive post-trial briefing, all of which was done on a contingent basis with no promise of payment. As a direct result of their efforts, Class Counsel have secured a Settlement which provides significant monetary compensation—from a Settlement Fund of \$150 million—to the current and former owners and lessees of the Class Vehicles. *See In re Omnivision Techs., Inc.*, 559 F. Supp. 2d 1036, 1046 (N.D. Cal. 2008) (“The overall result and benefit to the class from the

litigation is the most critical factor in granting a fee award.”).

As of August 11, 2025, there are 24,790 verified California, Idaho, and North Carolina Class Members, and, at least, 2,594 additional North Carolina Class Members who have submitted Identification Forms and will be eligible for direct Settlement Payments. Suppl. EisnerAmper Decl. ¶¶ 5, 10, 19. The Settlement Administrator will provide a final total of eligible Class Members by August 29, 2025. Based on current totals, the Settlement will provide Settlement Payments of at least \$3,380 each to the Class Members, after payment of the full amount of Attorneys’ Fee and Expenses, Service Awards, and Settlement Administration Expenses requested. This is *a substantial increase – approximately 25% – to the \$2,700 per vehicle damages awarded by the jury*. This is proof of Class Counsel’s exceptional performance from filing through trial and settlement.

III. The Class Plaintiff Service Awards Should Be Approved.

“Incentive awards are fairly typical in class action cases.” *Rodriguez v. W. Publ’g Corp.*, 563 F.3d 948, 958 (9th Cir. 2009) (citing 4 William B. Rubenstein, et al., *Newberg on Class Actions* § 11:38 (4th ed. 2008)); *China Agritech, Inc. v. Resh*, 584 U.S. 732, 747 n.7 (2018). They promote the public policy of encouraging individuals to undertake the responsibility of representative lawsuits. *Rodriguez*, 563 F.3d at 958–59.

A service award of \$30,000 each for each of the Class Plaintiffs is reasonable in light of the substantial time and effort they expended on behalf of the Classes, as well as the exceptional results achieved, and is in line with awards approved by federal courts in California and elsewhere. *Galeener v. Source Refrigeration & HVAC, Inc.*, 2015 WL 12977077, at *2 (N.D. Cal. Aug. 21, 2015) (collecting cases); *Garner v. State Farm Mut. Auto. Ins. Co.*, 2010 WL 1687832, at *17 (N.D. Cal. Apr. 22, 2010) (compiling cases and holding service award of \$20,000 were “well justified”); *Glass v. UBS Fin. Servs., Inc.*, 2007 WL 221862, at *16 (N.D. Cal. Jan. 26, 2007), *aff’d*, 331 F. App’x 452 (9th Cir. 2009) (approving \$25,000 awards to each of four representatives whose efforts were supported by class counsel’s declaration); *Van Vranken v. Atl. Richfield Co.*, 901 F. Supp. 294, 299 (N.D. Cal. 1995) (holding a service award of \$50,000 was “just and reasonable”).

CONCLUSION

For the foregoing reasons, and as set forth in the Plaintiffs' Motions, ECF Nos. 726, 727, Plaintiffs respectfully submit that final approval is warranted and the requested attorneys' fees, expenses, and service awards are justified.

DATED: August 13, 2025

Respectfully submitted,

/s/ H. Clay Barnett, III

H. Clay Barnett, III (*pro hac vice*)

W. Daniel "Dee" Miles, III (*pro hac vice*)

Rebecca D. Gilliland (*pro hac vice*)

J. Mitch Williams (*pro hac vice*)

Dylan T. Martin (*pro hac vice*)

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Class Counsel

ECF CERTIFICATION

Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that he has obtained concurrence regarding the filing of this document from the signatories above.

DATED: August 13, 2025

By: /s/ H. Clay Barnett, III
H. Clay Barnett, III (*pro hac vice*)

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RAUL SIQUEIROS, et al.,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 3:16-cv-07244-EMC

**SUPPLEMENTAL DECLARATION REGARDING NOTICE PLAN IMPLEMENTATION
AND SETTLEMENT ADMINISTRATION**

1 I, Ryan Aldridge, declare:

2 1. I am a Partner for the Court-appointed Settlement Administrator, Eisner Advisory Group,
3 LLC (“EAG” or “EisnerAmper”)¹. EisnerAmper was retained as the Settlement Administrator in this case,
4 and, as the Project Manager over this Settlement, I am personally familiar with the facts set forth in this
5 declaration.

6 2. I am over the age of 21. Except as otherwise noted, the matters set forth in this Declaration
7 are based upon my personal knowledge, information received from the parties in this proceeding, and
8 information provided by my colleagues at EisnerAmper and our partners.

9 **BACKGROUND**

10 3. In the Declaration Regarding Notice Plan Implementation (ECF No. 729) filed on July 7,
11 2025, I confirmed EisnerAmper started Notice in accordance with the Notice requirements contained in the
12 Notice Plan, Settlement Agreement, and the Court’s Preliminary Approval Order. I submit this Declaration
13 to report on the results of the Notice Plan and provide an update on the identification forms received to date.

14 **CLASS ACTION FAIRNESS ACT (“CAFA”)**

15 4. **CAFA Notice.** On April 25, 2025, pursuant to 28 U.S.C. § 1715, EisnerAmper, on behalf of
16 the Defendant, caused notice of this settlement and related materials to be sent to the Attorneys General of
17 all U.S. states, U.S. Territories and Puerto Rico as well as the Attorney General of the United States. To date,
18 EisnerAmper has not received any objection or any other response from any Attorneys General. A copy of
19 the CAFA Notice and mail list are attached as **Exhibit A**.

20 **CLASS NOTICE PROGRAM EXECUTION**

21 5. **Notice Database.** EisnerAmper maintains a database of 43,090 Class Members (“Notice
22 List”), which was used to effectuate the proposed Notice Plan. The 43,090 Class Members consist of 5,869
23 California Class Members, 1,611 Idaho Class Members, and 35,610 North Carolina Class Members. The
24 North Carolina Class Members are further grouped into two populations: (a) the vehicle was a single owner
25

26 ¹ EAG Gulf Coast, LLC is a subsidiary of Eisner Advisory Group LLC. “EisnerAmper” is the brand name under which
27 EisnerAmper LLP and Eisner Advisory Group LLC and its subsidiary entities provide professional services. EisnerAmper LLP
28 and Eisner Advisory Group LLC are independently owned firms that practice in an alternative practice structure in accordance
with the AICPA Code of Professional Conduct and applicable law, regulations and professional standards. EisnerAmper LLP is a
licensed CPA firm that provides attest services, and Eisner Advisory Group LLC and its subsidiary entities provide tax and business
consulting services. Eisner Advisory Group LLC and its subsidiary entities are not licensed CPA firms.

or purchased Certified Pre-Owned from the list of VINs provided by GM or the prior owner was registered in North Carolina and the current owner was registered in North Carolina (17,310 VINs) and (b) either the current or previous owner (but not both) was registered in North Carolina (18,300 VINs). Of the 43,090 Class Members, 24,790 Class Members meet the definition to receive a Direct Payment Notice and 18,300 Class Members meet the definition to receive an Identification Notice. Where both a mailing address and an email address exist for a Class Member in the Notice List, we have attempted to send both a Postcard Notice and an Email Notice. Additionally, if a cell-phone number was available for a North Carolina Class Member receiving the Identification Notice, we also attempted to send Notice as a text message.

6. **Email Notice.** On July 1, 2025, EisnerAmper commenced sending Email Notice to the 16,574 Class Members on the Notice List with an email address that passed hygiene and verification. EisnerAmper followed standard email best practices, including utilizing “unsubscribe” links and providing Settlement Administrator contact information in the Email Notice. Of the 16,574 Class Members with a deliverable email address, 8,885 were sent a Direct Payment Notice and 7,689 were sent an Identification Notice. Ultimately, the Email Notice was successfully delivered to 15,425 Class Members, or 93.1% deliverability. A true and correct copy of the Email Notices are attached as **Exhibit B**. Email Notice delivery statistics are detailed in Table 1 below.

7. **Text Notice.** Beginning on July 11, 2025, EisnerAmper sent an Identification Notice as a text message to 14,343 Class Members for whom a cell-phone number is available (“Text Notice”). Ultimately, the Text Notice was successfully delivered to 10,979 Class Members, or 76.5% deliverability. A true and correct copy of the Text Notice is attached as **Exhibit C**. Text Notice delivery statistics are detailed in Table 1 below.

8. **Mail Notice.** EisnerAmper coordinated and caused the Postcard Notice to be mailed via USPS First-Class Mail to Class Members for which a mailing address was available from the Notice List. The Postcard Notice included (a) the web address to the Settlement Website for access to additional information and documents, and (b) rights and options as a Class Members and the dates by which to act on those options, and the requested attorneys’ fees and expenses, and (c) the date of the Final Approval Hearing. The Notice mailing commenced on July 7, 2025, in accordance with the Preliminary Approval Order. A true and correct

copy of the Postcard Notices are attached as **Exhibit D**, with a copy of the Long Form Notice, and identification form.

9. ***Mailing Address Validation.*** Prior to the mailing, all mailing addresses were checked against the National Change of Address (NCOA) database maintained by the United States Postal Service (“USPS”). In addition, the addresses were certified via the Coding Accuracy Support System (CASS) to ensure the quality of the zip code and verified through Delivery Point Validation (DPV) to verify the accuracy of the addresses. Of the 43,090 Class Member records, 111 records did not successfully pass the address validation procedures noted above.

10. ***Mail Notice Delivery.*** EisnerAmper executed mailings to the 42,979 Class Members that passed address validation. Of the 42,979 Class Member records with a valid address, 24,744 were mailed a Direct Payment Notice and 18,235 were mailed an Identification Notice. EisnerAmper executed supplemental mailings for 202 Class Members for which the initial Postcard Notice was not deliverable but for which EisnerAmper was able to obtain an alternative mailing address through (1) forwarding addresses provided by the USPS, (2) skip trace searches using a third-party vendor database, or (3) requests received directly from Class Members. Mail notice delivery statistics are detailed in paragraph 18 below.

11. ***Reminder Email Notice.*** As the deadline to submit identification forms approached, EisnerAmper identified Class Members on the Notice List with a deliverable email address who had not yet submitted an identification form. On July 28, 2025, in consultation with Class Counsel, EisnerAmper commenced sending reminder Identification Notices as an email to these Class Members. The reminder Identification Notice was successfully delivered by email to 6,797 Class Members.

12. ***Reminder Text Notice.*** As the deadline to submit identification forms approached, EisnerAmper identified Class Members on the Notice List with an available cell-phone number who had not yet submitted an identification form. On July 28, 2025, in consultation with Class Counsel, EisnerAmper commenced sending reminder Identification Notices as a text message to these Class Members. The reminder Identification Notice was successfully delivered by text message to 9,232 Class Members.

13. ***Supplemental Digital Social Media Notice.*** On June 28, 2025, EisnerAmper commenced the customer match digital program on the Meta sites Facebook and Instagram, targeting the North Carolina

Class Members who were expected to receive an Identification Notice. More than 3,674,053 impressions were generated during the campaign. Screenshots of the digital banner notices are attached as **Exhibit E**.

14. **Settlement Post Office Box.** EisnerAmper maintains the following Post Office Box (the “P.O. Box”) for the Settlement Program:

GM 5300 LC9 Class Action
PO Box 5124
Baton Rouge, LA 70821

This P.O. Box serves as a location for the USPS to return undeliverable program mail to EisnerAmper and for Class Members to submit requests for exclusion, identification forms, and other settlement-related correspondence. The P.O. Box address appears prominently in all Notices, the identification form, and in multiple locations on the Settlement Website. EisnerAmper monitors the P.O. Box daily and uses a dedicated mail intake team to process each item received.

15. **Settlement Website.** On June 23, 2025, EisnerAmper updated the Settlement Website, www.GMEngineLitigation.com. Visitors to the Settlement Website can download the Long Form Notice (English and Spanish), the identification form (English and Spanish), as well as Court Documents, such as the First Class Action Complaint, the Eighth Amended Class Action Complaint, the Defendant’s Answer to the Eighth Amended Class Action Complaint, the Settlement Agreement, Motions filed by Class Counsel, and Orders of the Court. Visitors are also able to submit identification forms electronically, download an identification form to submit by mail, and find answers to frequently asked questions (FAQs), important dates and deadlines, and contact information for the Settlement Administrator. As of August 13, 2025, the Settlement Website received 13,847 unique visits since the Settlement Website was updated on June 23, 2025.

16. **Toll-Free Number.** EisnerAmper maintains the dedicated toll-free telephone number, 1-888-307-8239 (the “Toll-Free Number”), which is available twenty-four hours per day. Class Members can call and interact with an interactive voice response (“IVR”) system that provides important settlement information and offers the ability to leave a voicemail message to address specific requests or issues. EisnerAmper also provided copies of the Notice, paper identification form, and IRS Form W-9, upon request to Class Members, through the Toll-Free Number. The Toll-Free Number appeared in all Notices, as well as

in multiple locations on the Settlement Website. The Toll-Free Number will remain active through the close of this Settlement Program.

17. **Email Support.** EisnerAmper maintains an Email address, info@GMEngineLitigation.com, to provide an additional option for Class Members to address specific questions and requests to the Settlement Administrator for support.

NOTICE PROGRAM REACH

18. **Notice Reach Results.** Through the Notice procedures outlined above, EisnerAmper attempted to send direct Notice to 42,979 (99.7%) Class Members. As of August 13, 2025, the Notice Program reached a total of 42,356 (98.3%) Class Members². Table 1 provides an overview of dissemination results for the Notice Program and reach statistics for the Notice Program.

Table 1: Direct Notice Program Dissemination & Reach		
Description	Volume of Class Member Records	Percentage of Class Member Records (%)
Class Member Records	43,090	100.0%
Mail Notice		
(+) Postcard Notices Mailed	42,979	99.7%
(-) Total Postcard Notices Returned as Undeliverable	1,316	3.1%
Supplemental Mail Notice		
(+) Total Postcard Notices Re-mailed	202	0.5%
(-) Total Postcard Notices Returned as Undeliverable	35	0.1%
Email Notice		
(+) Total Email Notices Sent	16,574	38.5%
(+) Total Email Notices Delivered	15,425	35.8%
(-) Total Email Notices Bounced/Undelivered	1,149	2.7%
Text Message Notice		
(+) Total Text Notices Sent	14,343	33.3%
(+) Total Text Notices Delivered	10,979	25.5%
(-) Total Text Notices Bounced/Undelivered	3,364	7.8%
Reminder Email Notice		
(+) Total Reminder Email Notices Sent	7,689	17.8%
(+) Total Reminder Email Notices Delivered	6,797	15.8%
(-) Total Reminder Email Notices Bounced/Undelivered	892	2.1%

² A Settlement Class Member is considered “reached” by direct Notice if either (1) a Notice emailed was successfully sent to the Class Member or (2) a Notice mailed to the Settlement Class Member has not been returned by the USPS as undeliverable or, if a Notice mailed to the Settlement Class Member was returned by the USPS as undeliverable, a subsequent Notice was mailed to an alternative mailing address for the Settlement Class Member and was not returned.

Reminder Text Message Notice		
(+) Total Reminder Text Notices Sent	13,585	31.5%
(+) Total Reminder Text Notices Delivered	9,232	21.4%
(-) Total Reminder Text Notices Bounced/Undelivered	4,353	10.1%
Direct Notice Program Reach		
(+) Received Mail & Email and/or Text Notice	21,621	50.2%
(+) Received Only Mail Notice	20,209	46.9%
(+) Received Only Email and/or Text Notice	526	1.2%
(=) Received Direct Notice	42,356	98.3%

IDENTIFICATION FORM ACTIVITY

19. **Identification Form Intake and Processing.** Class Members had the option of submitting identification forms online or mailing the printed or postcard identification form to the Settlement Administrator. The online identification form submission feature was available beginning on June 23, 2025. The deadline to file an identification form was August 8, 2025. As of August 13, 2025, EisnerAmper has received a total of 2,986 identification forms. Of these, EisnerAmper has determined that 2,594 identification forms are timely submissions, are from Class Members, and are non-duplicative. EisnerAmper will continue to analyze and intake any additional identification forms mailed to the P.O. Box and postmarked by the identification form deadline. Table 2 below provides summary statistics of identification form submissions and current dispositions.

Table 2: North Carolina Identification Form Statistics (as of August 13, 2025)	
Description	Volume (#)
Total NC Identification Forms Received	2,986
(-) Duplicate NC Identification Forms	190
(-) Invalid NC Identification Forms	202
Net NC Identification Forms Received	2,594

OBJECTIONS

20. **Settlement Objections.** The Settlement Agreement directed objections be filed with the Court. EisnerAmper has not received any objections from Class Members as of August 13, 2025. The deadline to object to the Settlement expired on August 8, 2025.

21. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 13th day of August, 2025 in Baton Rouge, Louisiana.

A handwritten signature in black ink, reading "Ryan Aldridge". The signature is written in a cursive, flowing style. The first name "Ryan" is written with a large, looped "R". The last name "Aldridge" is written with a large, looped "A" and a trailing flourish.

Ryan Aldridge



Exhibit A: CAFA Notice



EAG Gulf Coast, LLC

8550 United Plaza Blvd.

Suite 1001

Baton Rouge, LA 70809

T 225.922.4600

F 225.922.4611

www.eisneramper.com

April 23, 2025

By Certified Mail

Federal and State Officials
as listed in Attachment 1

Re: NOTICE UNDER THE CLASS ACTION FAIRNESS ACT OF 2005, 28 U.S.C. § 1715(b),
Raul Siqueiros et al. v. General Motors, LLC, Case No. 16-cv-07244-EMC (United States District Court, Northern District of California, San Francisco Division)

Dear Sir or Madam:

I send this letter and the enclosed disc to you on behalf of the Parties to the action referenced above (the "Parties") regarding the Unopposed Motion for Preliminary Approval of a Class Action Settlement filed on April 17, 2025. This communication constitutes the notice required by the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) ("CAFA").

The proposed settlement resolves the class action lawsuit brought by Garret Tarvin, Gabriel Del Valle, and William Davis, Jr. ("Class Plaintiffs" or "Class Representatives") against General Motors LLC, ("Defendant") concerning an allegation 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. The Classes and specific vehicles included in the settlement (the "Class Vehicles") are identified in the Settlement Agreement.

In accordance with 28 U.S.C. § 1715(b), the enclosed disc includes:

- a. Exhibit 1: A copy of the first Class Action Complaint filed on December 19, 2016;
- b. Exhibit 2: A copy of the currently operative Eighth Amended Class Action Complaint filed on July 13, 2022;
- c. Exhibit 3: A copy of the Plaintiffs' Notice of Motion, and Unopposed Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities filed on April 17, 2025;



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- d. Exhibit 4: The Settlement Agreement filed on April 17, 2025, including the Proposed Preliminary Approval Order, Notice Plan, Class Notice Documents, Plan of Allocation, Proposed Final Approval Order, and Proposed Final Judgment attached as Exhibits 1-8 to the Settlement Agreement;
- e. Exhibit 5: Per 28 U.S.C. §§ 1715(b)(7)(A)-(B), the estimated number of potential class members by state. Class Members will be entitled to a *pro rata* share of a \$150,000,000 Settlement Amount. The Settlement Amount will be used to pay Class Members, Settlement expenses, including the costs of Class Notice and Settlement administration, and Attorneys' Fees and Expenses, and Service Awards as may be awarded by the Court. It is estimated that no Class Member will receive less than \$2,149.

A hearing on Plaintiffs' Unopposed Motion for Preliminary Approval of the Class Action Settlement is scheduled for May 29, 2025, at 1:30 p.m. before the Honorable Edward M. Chen of the United States District Court for the Northern District of California, 450 Golden Gate Ave., Courtroom 5, 17th Floor, San Francisco, CA, 94102. No other hearings have yet been scheduled.

There are no other agreements between Class Counsel and counsel for Defendant, there are no final judgments in this matter, and there are no written judicial opinions relating to the materials described under 28 U.S.C. §§ 1715(b)(3)-(6).

Thank you for your attention to this matter. Please contact us if you have any questions about this notice or the enclosed materials.

Sincerely,

A handwritten signature in black ink that reads "Jordan Turner".

Jordan Turner

Eisner Advisory Group, LLC ("EAG") as *Settlement Administrator for Raul Siqueiros et al. v. General Motors, LLC*

cc by email:

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Attorneys for General Motors LLC ("Defendant")

**EAG Gulf Coast, LLC**www.eisneramper.com

CAFA Notice Service List							
Raul Siqueiros et al. v. General Motors, LLC, Case No. 16-cv-07244-EMC (Northern District of California, San Francisco Division)							
Name1	Name2	Address1	Address2	Address3	City	State	Zip
Office of the Attorney General		1031 W. 4th Avenue, Suite 200			Anchorage	AK	99501-1994
Office of the Attorney General		501 Washington Avenue	PO Box 300152		Montgomery	AL	36104
Office of the Attorney General		323 Center Street, Suite 200			Little Rock	AR	72201-2610
Office of the Attorney General		PO Box 7			Pago Pago	AS	96799
Office of the Attorney General		2005 N Central Ave			Phoenix	AZ	85004-2926
Office of the Attorney General	CAFA Coordinator, Consumer Law Section	455 Golden Gate Avenue, Suite 11000			San Francisco	CA	94102
Office of the Attorney General		Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor		Denver	CO	80203
Office of the Attorney General		165 Capitol Avenue			Hartford	CT	06106
Office of the Attorney General		441 4th Street NW, Suite 1100S			Washington	DC	20001
United States Office of the Attorney General	US Department of Justice	950 Pennsylvania Ave, NW			Washington	DC	20530-0001
Office of the Attorney General		820 North French Street	6th Floor		Wilmington	DE	19801
Office of the Attorney General		The Capitol	PL-01		Tallahassee	FL	32399-1050
Office of the Attorney General		40 Capitol Square SW			Atlanta	GA	30334
Office of the Attorney General	Administrative Division	590 S. Marine Corps Dr., Suite 901			Tamuning	GU	96913
Department of the Attorney General		425 Queen Street			Honolulu	HI	96813
Office of the Attorney General		Hoover State Office Building	1305 East Walnut Street		Des Moines	IA	50319
Office of the Attorney General		954 West Jefferson Street, 2nd floor	PO Box 83720		Boise	ID	83720-0010
Office of the Attorney General		100 West Randolph Street			Chicago	IL	60601
Office of the Attorney General		Indiana Government Center South	302 West Washington Street, 5th Floor		Indianapolis	IN	46204
Office of the Attorney General		120 SW 10th Ave, 2nd Floor			Topeka	KS	66612-1597
Office of the Attorney General		700 Capitol Avenue, Suite 118			Frankfort	KY	40601-3449
Office of the Attorney General		PO Box 94005			Baton Rouge	LA	70804
Office of the Attorney General	ATTN: CAFA Coordinator/General Counsel's Office	One Ashburton Place			Boston	MA	02108
Office of the Attorney General		200 St. Paul Place			Baltimore	MD	21202
Office of the Attorney General		6 State House Station			Augusta	ME	04333
Office of the Attorney General		G. Mennen Williams Building	525 West Ottawa Street	PO Box 30212	Lansing	MI	48909
Office of the Attorney General		445 Minnesota Street, Suite 1400			St Paul	MN	55101-2131
Office of the Attorney General		Supreme Court Building	207 West High Street		Jefferson City	MO	65102
Office of the Attorney General		Administrative Building	PO Box 10007		Saipan	MP	96950
Office of the Attorney General		Walter Sillers Building	550 High Street, Suite 11		Jackson	MS	39201
Office of the Attorney General		Justice Building Third Floor	215 North Sanders		Helena	MT	59601
Office of the Attorney General	ATTN: Consumer Protection	114 West Edenton Street			Raleigh	NC	27603
Office of the Attorney General		State Capitol	600 East Boulevard Avenue, Dept. 125		Bismarck	ND	58505
Office of the Attorney General		2115 State Capitol	PO Box 98920		Lincoln	NE	68509
Office of the Attorney General		33 Capitol Street			Concord	NH	03301
Office of the Attorney General		RJ Hughes Justice Complex	25 Market Street	PO BOX 080	Trenton	NJ	08625-0080
Office of the Attorney General	ATTN: Farrah Diaz, Paralegal	201 3rd St NW, Suite 300			Albuquerque	NM	87102
Office of the Attorney General		Old Supreme Court Building	100 North Carson Street		Carson City	NV	89701
Office of the Attorney General		The Capitol			Albany	NY	12224-0341
Office of the Attorney General		State Office Tower	30 East Broad Street, 14th Floor		Columbus	OH	43215
Office of the Attorney General		313 NE 21st Street			Oklahoma City	OK	73105
Office of the Attorney General	Oregon Department of Justice	1162 Court Street NE			Salem	OR	97301-4096
Office of the Attorney General		16th Floor, Strawberry Square			Harrisburg	PA	17120
Office of the Attorney General		PO Box 9020192			San Juan	PR	00902-0192
Office of the Attorney General	ATTN: Lisa Pinsonneault/CAFA Notice	150 South Main Street			Providence	RI	02903
Office of the Attorney General		PO Box 11549			Columbia	SC	29211-1549
Office of the Attorney General		1302 E. Highway 14, Suite 1			Pierre	SD	57501-8501
Office of the Attorney General and Reporter		PO Box 20207			Nashville	TN	37202
Office of the Attorney General		Capitol Station	PO Box 12548		Austin	TX	78711-2548
Office of the Attorney General		Utah State Capitol Complex	350 North State Street, Suite 230		Salt Lake City	UT	84114-2320
Office of the Attorney General		202 North Ninth Street			Richmond	VA	23219
Office of the Attorney General		34-38 Kronprindsens Gade	Gers Building, 2nd Floor		St Thomas	VI	00802
Office of the Attorney General		109 State Street			Montpelier	VT	05609
Office of the Attorney General		1125 Washington Street SE	PO Box 40100		Olympia	WA	98504-0100
Office of the Attorney General	Wisconsin Department of Justice	PO Box 7857			Madison	WI	53707-7857
Office of the Attorney General		State Capitol	Building 1, Room E-26		Charleston	WV	25305
Office of the Attorney General		Kendrick Building	2320 Capital Avenue		Cheyenne	WY	82002



Exhibit B: Email Notices

Subject: Notice of Settlement - Siqueiros et al. v. General Motors, LLC
From: GM 5300 LC9 Class Action Administrator notice@pnclassaction.com
Reply-To: info@GMEngineLitigation.com
To: Test@email.com

Dear [Class Member Name],

Your Notice ID is: **ABC-1234567**

LEGAL NOTICE

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

A federal court ordered this notice. This is not a solicitation from a lawyer.

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.

Visit www.GMEngineLitigation.com to file an Identification Form by August 8, 2025.

What is the lawsuit about?

Plaintiffs allege that the LC9 Engines in every Class Vehicle contain an inherently defective piston assembly which may lead to excessive oil consumption and related engine problems. GM denies any wrongdoing or liability for the claims alleged and specifically denies that any Class Vehicle is defective.

Who is included?

The "Class Vehicles" are: 2011-2014 Chevrolet Avalanches, Silverados, Suburbans, and Tahoes, and 2011-2014 GMC Sierras, Yukons, and Yukon XLs with LC9 engines manufactured on or after February 10, 2011. Any vehicle that has already received adequate piston replacement (i.e., piston replacement in which the new pistons were not merely new versions of the same allegedly defective pistons) under warranty and at no cost is excluded from the Classes. Additionally, anyone who previously requested to be excluded from the certified Classes, after the notice sent on or around May 23, 2022, is not a part of the Classes and will not be eligible to receive compensation under the Settlement or object to the Settlement or its terms.

"Class Members" are all current owners or lessees of a Class Vehicle as of May 23, 2022, who purchased or leased the vehicle (a) in North Carolina, (b) from a GM-authorized dealer in Idaho, or (c) in new condition in California.

What does the settlement provide?

GM has agreed to pay a total of \$150,000,000 as part of the Settlement. That amount will be used to pay Class Members, Settlement expenses, including the costs of Class Notice and Settlement administration, and Attorneys' Fees and Expenses, and Service Awards as may be awarded by the Court.

What are your options?

Complete the North Carolina Class Member Identification Form: Information available through state departments of motor vehicles indicate that your Class Vehicle was registered in North Carolina, but the information did not identify the state of purchase. **If you meet the definition of the North Carolina Class, and would like to receive a Settlement Payment, estimated to be no less than \$2,149, you must complete and submit an Identification Form.** The amounts of the Settlement Payments are subject to a pro rata increase or decrease based on participation of Class Members. You may submit your form electronically through the Settlement Website (www.GMEngineLitigation.com). You must submit online or mail postmarked by **August 8, 2025**.

Do Nothing: If you do nothing, you will not be eligible to receive a payment and will be bound by the terms of the Settlement Agreement and Final Judgment.

Object: You may object to any part of this Settlement. Details about how to object are available at the Settlement Website. Objections must be mailed to the Court **postmarked on or before August 8, 2025**.

Has the Court approved the Settlement?

The Court has not decided whether to approve the Settlement yet. The Court has set a hearing for **October 2, 2025 at 1:30 p.m. PT** to determine whether to approve the Settlement and award Attorneys' Fees and Expenses, and Service Awards. Class Counsel will file a motion seeking an award of up to 38% of the Settlement Fund in attorneys' fees and reimbursement of case expenses. Class Counsel will also seek, on behalf of the Class Plaintiffs, Service Awards of \$30,000 each. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

You do not need to appear at the hearing but you may come at your own expense. The Court has appointed Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., and DiCello Levitt LLP as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

This is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available at www.GMEngineLitigation.com or by calling 1-888-307-8239.

GM5300 LC9 Class Action
P.O. Box 5124
Baton Rouge, LA 70821

If you do not wish to receive future emails [Click here to opt out](#)

Subject: Notice of Settlement - Siqueiros et al. v. General Motors, LLC
From: GM 5300 LC9 Class Action Administrator notice@pncclassaction.com
Reply-To: info@GMEngineLitigation.com
To: Test@email.com

Dear [Class Member Name],

Your Notice ID is: **ABC-1234567**

LEGAL NOTICE

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What is the lawsuit about?

Plaintiffs allege that the LC9 Engines in every Class Vehicle contain an inherently defective piston assembly which may lead to excessive oil consumption and related engine problems. GM denies any wrongdoing or liability for the claims alleged and specifically denies that any Class Vehicle is defective.

Who is included?

The "Class Vehicles" are: 2011-2014 Chevrolet Avalanches, Silverados, Suburbans, and Tahoes, and 2011-2014 GMC Sierras, Yukons, and Yukon XLs with LC9 engines manufactured on or after February 10, 2011. Any vehicle that has already received adequate piston replacement (i.e., piston replacement in which the new pistons were not merely new versions of the same allegedly defective pistons) under warranty and at no cost is excluded from the class. Additionally, anyone who previously requested to be excluded from the Class, after the notice sent on or around May 23, 2022, is not a part of the Settlement Classes and will not be eligible to receive compensation under the Settlement or object to the Settlement or its terms.

"Class Members" are all owners or lessees of a Class Vehicle as of May 23, 2022 who purchased or leased the vehicle (a) in North Carolina, (b) from a GM-authorized dealer in Idaho, or (c) in new condition in California.

What does the settlement provide?

GM has agreed to pay a total of \$150,000,000 as part of the Settlement. That amount will be used to pay Class Members, Settlement expenses, including the costs of Class Notice and Settlement administration, Attorneys' Fees and Expenses, and Service Awards as may be awarded by the Court.

What are your options?

Do Nothing: If you do nothing you will remain a member of the Class, you will receive a payment estimated to be no less than \$2,149 if the Settlement is approved, and you will be bound by the release of claims in this Settlement. Payments will be distributed by the Settlement Administrator after the Court grants "final approval" of the Settlement and after any appeals are resolved. You do not need to file a claim to receive a payment under the

Settlement. Your Settlement Payment in the form of a check will be sent directly to you. If you have not done so already, it is strongly recommended that you complete and submit an IRS Form W-9 on the Settlement Website (www.GMEngineLitigation.com) by August 8, 2025 to prevent required Federal Income Tax backup withholding of 24%.

Object: You may object to any part of this Settlement. Details about how to object are available at the Settlement Website. Objections must be mailed to the Court postmarked on or before **August 8, 2025**. For further information, please review the Long Form Notice, available at www.GMEngineLitigation.com.

Has the Court approved the Settlement?

The Court has not decided whether to approve the Settlement yet. The Court has set a hearing for **October 2, 2025 at 1:30 p.m. PT** to determine whether to approve the Settlement and award Attorneys' Fees and Expenses, and Service Awards. Class Counsel will file a motion seeking an award of up to 38% of the Settlement Fund in attorneys' fees and reimbursement of case expenses. Class Counsel will also seek, on behalf of the Class Representatives, Service Awards of \$30,000 each. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

You do not need to appear at the hearing but you may come at your own expense. The Court has appointed Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. and DiCello Levitt LLP and as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

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GM5300 LC9 Class Action
P.O. Box 5124
Baton Rouge, LA 70821

If you do not wish to receive future emails [Click here to opt out](#)

Exhibit C: Text Notice

U.S. Federal Court Authorized Notice

{Name}, we are following up on your prior notice of a pending class action lawsuit involving your {year} {model} to inform you that a settlement has been reached.

To receive payment, you must confirm your eligibility by visiting your unique link: {{GUID}}.

For more information regarding your rights and deadlines to act, visit

GMEngineLitigation.com or call 1-888-307-8239.

Txt STOP to OptOut



Exhibit D: Postcard Notices, Long Form Notice, Identification Form

**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.**

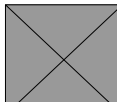
A federal court ordered this notice. This is not a solicitation from a lawyer.

This postcard is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available at www.GMEngineLitigation.com or by calling 1-888-307-8239.

What is the lawsuit about? Plaintiffs allege that the LC9 Engines in every Class Vehicle contain an inherently defective piston assembly which may lead to excessive oil consumption and related engine problems. GM denies any wrongdoing or liability for the claims alleged and specifically denies that any Class Vehicle is defective.

GM 5300 LC9 Class Action

P.O. Box 5124
Baton Rouge, LA 70821



ELECTRONIC SERVICE REQUESTED

Notice ID: [notice Id]
[FIRST NAME] [LAST NAME]
[ADDRESS1]
[ADDRESS2]
[CITY] [STATE] [ZIP]



Business Reply Mail Content

who is included. The Class Vehicles are: 2011-2014 Chevrolet Avalanches, Silverados, Suburbans, and Tahoees, and 2011-2014 GMC Sierras, Yukons, and Yukon XLs with LC9 engines manufactured on or after February 10, 2011. Any vehicle that has already received adequate piston replacement (*i.e.*, piston replacement in which the new pistons were not merely new versions of the same allegedly defective pistons) under warranty and at no cost is excluded from the Classes. Additionally, anyone who previously requested to be excluded from the certified Classes, after the notice sent on or around May 23, 2022, is not a part of the Classes and will not be eligible to receive compensation under the Settlement or object to the Settlement or its terms.

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What are your options?

Complete the North Carolina Class Member Identification Form: Information available through state departments of motor vehicles indicate that your Class Vehicle was registered in North Carolina, but the information did not identify the state of purchase. **If you meet the definition of the North Carolina Class, and would like to receive a Settlement Payment, estimated to be no less than \$2,149, you must complete and submit the Identification Form attached to this postcard.** The amounts of the Settlement Payments are subject to a *pro rata* increase or decrease based on participation of Class Members. Alternatively, you may submit your form electronically through the Settlement Website (www.GMEngineLitigation.com). You must submit online or return the attached form postmarked by **August 8, 2025**.

Do Nothing: If you do nothing, you will not be eligible to receive a payment and will be bound by the terms of the Settlement Agreement and Final Judgment.

Object: You may object to any part of this Settlement. Details about how to object are available at the Settlement Website. Objections must be mailed to the Court **postmarked on or before August 8, 2025**.

Has the Court approved the Settlement? The Court has not decided whether to approve the Settlement yet. The Court has set a hearing for **October 2, 2025 at 1:30 p.m. PT** to determine whether to approve the Settlement and award Attorneys’ Fees and Expenses, and Service Awards. Class Counsel will file a motion seeking an award of up to 38% of the Settlement Fund in attorneys’ fees and reimbursement of case expenses. Class Counsel will also seek, on behalf of the Class Plaintiffs, Service Awards of \$30,000 each. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

You do not need to appear at the hearing but you may come at your own expense. The Court has appointed Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., and DiCello Levitt LLP as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

North Carolina Class Member Identification Form -- VIN: [VIN Number]

If you purchased your Class Vehicle in North Carolina with the VIN number provided above and would like to receive a Settlement Payment, you must complete the form below, check the boxes to complete the attestation, and mail to the Settlement Administrator postmarked by **August 8, 2025**.

Contact Information *(Please fill in completely.)*

Full Name: _____ Telephone Number: _____

Address: _____

City, State, Zip Code: _____

Email Address: _____

I attest under the penalty of perjury, to the best of my knowledge, that, as of May 23, 2022, I was the owner of the Class Vehicle with the Vehicle Identification Number (VIN) at the top of this form.

☐ **Yes** ☐ **No**

I attest under the penalty of perjury, to the best of my knowledge, that I purchased the Class Vehicle in North Carolina.

☐ **Yes** ☐ **No**

*You may be asked to submit documentation that supports that you own or own the Class Vehicle associated with the VIN number at the top of this form and that you purchased the vehicle in North Carolina.

Sign and Date your Identification Form

I declare that the information supplied in this form by the undersigned is true and correct to the best of my recollection, and that this form was executed on the date set forth below. I understand that I may be asked to provide supplemental information to the Settlement Administrator before my claim will be considered complete and valid including a W-9.

Signature: _____ Date (mm/dd/yyyy): _____

The deadline to submit this form is **August 8, 2025**. Questions? Call 1-888-307-8239 or visit www.GMEngineLitigation.com.

Legal Notice

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Engine in California, Idaho, or North Carolina.**

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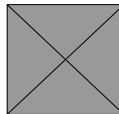
This postcard is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available at www.GMEngineLitigation.com or by calling 1-888-307-8239.

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GM 5300 LC9 Class Action

P.O. Box 5124

Baton Rouge, LA 70821



ELECTRONIC SERVICE REQUESTED

Notice ID: [notice Id]

[FIRST NAME] [LAST NAME]

[ADDRESS1]

[ADDRESS2]

[CITY] [STATE] [ZIP]



Who is included? The “Class Vehicles” are: 2011-2014 Chevrolet Avalanches, Silverados, Suburbans, and Tahoes, and 2011-2014 GMC Sierras, Yukons, and Yukon XLs with LC9 engines manufactured on or after February 10, 2011. Any vehicle that has already received adequate piston replacement (i.e., piston replacement in which the new pistons were not merely new versions of the same allegedly defective pistons) under warranty and at no cost is excluded from the class. Additionally, anyone who previously requested to be excluded from the Class, after the notice sent on or around May 23, 2022, is not a part of the Settlement Classes and will not be eligible to receive compensation under the Settlement or object to the Settlement or its terms.

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Object: You may object to any part of this Settlement. Details about how to object are available at the Settlement Website. Objections must be mailed to the Court **postmarked on or before August 8, 2025**. For further information, please review the Long Form Notice, available at www.GMEngineLitigation.com.

Has the Court approved the Settlement? The Court has not decided whether to approve the Settlement yet. The Court has set a hearing for **October 2, 2025 at 1:30 p.m. PT** to determine whether to approve the Settlement and award Attorneys’ Fees and Expenses, and Service Awards. Class Counsel will file a motion seeking an award of up to 38% of the Settlement Fund in attorneys’ fees and reimbursement of case expenses. Class Counsel will also seek, on behalf of the Class Representatives, Service Awards of \$30,000 each. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund. You do not need to appear at the hearing but you may come at your own expense. The Court has appointed Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. and DiCello Levitt LLP and as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

**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.

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25. How do I get more information?

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

BASIC INFORMATION

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 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

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

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.

OBJECTING TO THE SETTLEMENT

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**

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

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.**

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

GM5300 LC9 Class Action
PO Box 5124
Baton Rouge, LA 70821

**Your Identification Form Must Be Submitted
On Or Before 08/08/2025**

Siqueiros et al. v. General Motors, LLC

Case No. 3:16-cv-07244-EMC (N.D. Cal.)

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. You must complete the form below, check the boxes to complete the attestation, and mail to the Settlement Administrator postmarked by **August 8, 2025**. You may also complete this form online at www.GMEngineLitigation.com.

North Carolina Class Member Identification Form

CONTACT INFORMATION (PLEASE PRINT AND FILL IN COMPLETELY)

First Name

Last Name

Street Address

City

State

Zip Code

Email Address

 - -

Phone Number

VIN (Vehicle Identification Number)

 -

Notice ID, if available (provided on class notice)

I attest under the penalty of perjury, to the best of my knowledge, that, as of May 23, 2022, I was the owner of the Class Vehicle with the Vehicle Identification Number (VIN) provided on this form.

☐

Yes

☐

No

I attest under the penalty of perjury, to the best of my knowledge, that I purchased the Class Vehicle in North Carolina.

☐

Yes

☐

No

*You may be asked to submit documentation that supports that you owned or own the Class Vehicle associated with the VIN number provided on this form and that you purchased the vehicle in North Carolina.

Sign and Date your Identification Form

I declare that the information supplied in this form by the undersigned is true and correct to the best of my recollection, and that this form was executed on the date set forth below. I understand that I may be asked to provide supplemental information to the Settlement Administrator before my claim will be considered complete and valid including a W-9.

Signature: _____

Date: / /

For more information, visit www.GMEngineLitigation.com

Toll Free Number: 1-888-307-8239

Identification Forms should be mailed to GM5300 LC9 Class Action, PO Box 5124, Baton Rouge, LA 70821

Exhibit E: Supplemental Digital Social Media Notice

- Meta AI
- Friends
- Saved
- Memories
- Groups
- Reels
- Marketplace
- See more

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2025 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 North Carolina.




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