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13 Attorneys for Plaintiffs

14 UNITED STATES DISTRICT COURT  
 15 CENTRAL DISTRICT OF CALIFORNIA  
 16

17 KIM BOSTICK and BRANDEN  
 18 JAMISON, individually, and on  
 19 behalf of a class of similarly situated  
 individuals,

20 Plaintiffs,

21 v.

22 GENERAL MOTORS LLC, a  
 23 Delaware corporation,

24 Defendant.

Case No.:

**CLASS ACTION COMPLAINT  
 FOR:**

- (1) Violations of California’s Consumers Legal Remedies Act
- (2) Violations of Unfair Competition Law
- (3) Breach of Implied Warranty pursuant to Song-Beverly Consumer Warranty Act
- (4) Breach of Express Warranty under California law
- (5) Breach of Express Warranty under the Magnuson-Moss Warranty Act
- (6) Breach of Express and Implied Warranty under the Magnuson-Moss Warranty Act
- (7) Unjust Enrichment

**DEMAND FOR JURY TRIAL**



1 aluminum drive shaft) that GM failed to disclose to Plaintiffs, consumers, and  
2 each Class Member. The defective drivelines were installed in all of the Class  
3 Vehicles.

4 6. In the Class Vehicles, the drive shaft is an aluminum tube that runs  
5 the length of the interior, transmitting torque and rotation from the engine to the  
6 wheels. When the output shaft of the transmission rotates, it spins the drive shaft,  
7 turning the differential ring gear to rotate the wheels. The drive shaft must be a  
8 precisely designed, manufactured, balanced, and weighted component because it  
9 must rotate at high speeds and torque values to turn the wheels.

10 7. Plaintiffs and Class Members purchased GM vehicles fitted with  
11 defective drive shafts that cause them to shake at highway speeds. This is a  
12 major safety concern because drivers have reported that the Defect makes the  
13 vehicles feel unstable at highway speeds and can cause a loss of control. Over  
14 time, an unaddressed drive shaft Defect can cause the part to progressively  
15 deteriorate, culminating in failure as the shaft drops to the ground and renders  
16 the vehicle undriveable.

17 8. The Defect is inherent in each Class Vehicle and was present at the  
18 time of sale.

19 9. GM has long been on notice about the Defect and that its drive  
20 shafts are not fit for their intended purpose, as detailed at length in the factual  
21 background section below. On information and belief, GM knew of the Defect  
22 through pre-production testing, pre-production design failure mode analysis,  
23 design failure mode analysis, calls to its customer service hotline, and customer  
24 complaints made to dealers, aggregate warranty data compiled from those  
25 dealers, repair order and parts data received from the dealers, consumer  
26 complaints to dealers and the National Highway Traffic Safety Administration  
27 (“NHTSA”), and testing performed in response to consumer complaints.  
28 However, this knowledge and information was exclusively in the possession of

1 GM and its network of dealers and, therefore, unavailable to consumers.

2 10. GM sold, leased, and continues to sell and lease the Class Vehicles  
3 despite its awareness of the Defect and without disclosing the existence of the  
4 Defect. GM chose and continues to choose financial gain at the expense of  
5 consumers by concealing and omitting a disclosure of this critical driveline  
6 component and potential safety hazard to consumers who purchase or lease Class  
7 Vehicles.

8 11. GM actively concealed and/or failed to notify the public of the  
9 existence and nature of the Defect and of the safety hazard presented by the  
10 Defect. GM has not recalled the vehicles to replace the drive shafts; it has not  
11 offered to replace the drive shafts to its customers free of charge; and it has not  
12 offered to reimburse owners, present or past, who have incurred costs relating to  
13 diagnosing and repairing issues arising from the Chevy Shake. GM's conduct  
14 violates California's well-established consumer protection laws and constitutes a  
15 continuous breach of its warranties to Plaintiffs and consumers in the United  
16 States.

17 12. The Defect is material because it poses a serious safety concern. As  
18 attested by Class Members in complaints to NHTSA and other online forums, the  
19 Defect can impair any driver's ability to control his or her vehicle and greatly  
20 increase the risk of collision.

21 13. The Defect is also material because consumers will incur significant  
22 and unexpected repair costs. GM's failure to disclose, at the time of purchase or  
23 lease, the drive shafts' marked tendency to fail is material because no reasonable  
24 consumer expects to spend hundreds, if not thousands, of dollars to repair or  
25 replace essential drive shaft related components.

26 14. Plaintiffs and Class Members have suffered harm as a result of  
27 GM's decision not to disclose the Defect by overpaying for their vehicles.

28 15. Had GM disclosed the Defect, Plaintiffs and Class Members would

1 not have purchased or leased the Class Vehicles or would have paid less for  
2 them.

3 **THE PARTIES**

4 **Plaintiff Kim Bostick**

5 16. Plaintiff Kim Bostick is a California citizen who resides in Morongo  
6 Valley, California.

7 17. On or around September 13, 2017, Plaintiff Bostick purchased a  
8 new 2017 Chevrolet Silverado 1500 from Jessup Auto Plaza Chevrolet (“the GM  
9 dealership”), an authorized GM dealer in Cathedral City, California.

10 18. Plaintiff Bostick purchased her vehicle primarily for personal,  
11 family, or household use.

12 19. Passenger safety and reliability were important factors in Plaintiff  
13 Bostick’s decision to purchase her vehicle. Before making her purchase, Plaintiff  
14 Bostick researched the Chevrolet Silverado online, including on Kelley Blue  
15 Book and on the GM dealership’s website. During her research, she also viewed  
16 dozens of advertisements for the vehicle. At the GM dealership, Plaintiff Bostick  
17 test drove a Chevrolet Silverado vehicle with a representative from the GM  
18 dealership. At no point did she see any disclosures or information regarding the  
19 Defect.

20 20. GM’s omissions were material to Plaintiff Bostick. Had GM  
21 disclosed its knowledge of the Defect before she purchased her vehicle, Plaintiff  
22 Bostick would have seen and been aware of the disclosures. Furthermore, had  
23 she known of the Defect, Plaintiff Bostick would not have purchased her vehicle,  
24 or would have paid less for it.

25 21. Plaintiff Bostick experienced the Chevy Shake within a year of  
26 purchase when the vehicle had approximately 25,000 miles on the odometer—  
27 well within GM’s bumper-to-bumper and powertrain warranties. Her Silverado  
28 shakes at low speeds and begins to shake more severely at approximately 65

1 miles per hour and above. During this time, the center console aggressively  
2 shakes left to right such that if a cup were placed in the console without a lid, it  
3 would spill. Indeed, the shaking has caused liquid to spill in Ms. Bostick's  
4 vehicle.

5 22. To date, Ms. Bostick has paid approximately \$1,476.98 to attempt to  
6 fix the Defect. On November 19, 2018, Ms. Bostick brought her vehicle to  
7 America's Tire in Morongo Valley, California, complaining that her vehicle was  
8 vibrating at low and highway speeds. In response, the repair facility installed  
9 four new tires at an out-of-pocket cost to Ms. Bostick of \$975.95.

10 23. Despite these repairs, the vibration problems continued unabated,  
11 and Ms. Bostick returned to the repair facility on November 23, 2018,  
12 complaining that her vehicle was still vibrating. In response, the repair facility  
13 rebalanced the tires.

14 24. Despite this repair, the vibration problems continued unabated.  
15 Accordingly, in early December 2018, Ms. Bostick again returned to America's  
16 Tire complaining of vibration. In response, the repair facility *again* replaced Ms.  
17 Bostick's tires, this time at an out-of-pocket cost to Ms. Bostick of \$501.03.  
18 Despite these replacements, the vibration problems continued unabated.

19 25. On December 11, 2018, with approximately 30,529 miles on the  
20 odometer, Ms. Bostick brought her vehicle back to the GM dealership  
21 complaining of a vibration at low speeds that gets worse at higher speeds. The  
22 dealership test drove the vehicle and admitted that vibration was occurring above  
23 70 miles per hour. However, the dealership denoted the vibration as "normal"  
24 and failed to perform any repairs. Consequently, following this visit, the  
25 vehicle's vibration problems continued—and continue—unabated.

26 26. At all times, Plaintiff Bostick, like all Class Members, has driven  
27 her vehicle in a foreseeable manner, and she has not operated her vehicle in a  
28 manner that was unintended by GM. However, despite her normal and

1 foreseeable driving, the Defect rendered her vehicle unsafe and unfit to be used  
2 as intended.

3

4 **Plaintiff Branden Jamison**

5 27. Plaintiff Branden Jamison is a California citizen who resides in  
6 Upland, California.

7 28. On or around August 3, 2018, Plaintiff Jamison purchased a new  
8 2018 Chevrolet Silverado 1500 from Mark Christopher Chevrolet (“the GM  
9 dealership”), an authorized GM dealer in Ontario, California.

10 29. Plaintiff Jamison purchased his vehicle primarily for personal,  
11 family, or household use.

12 30. Passenger safety and reliability were important factors in Plaintiff  
13 Jamison’s decision to purchase his vehicle. Before making his purchase, Plaintiff  
14 Jamison researched the Chevrolet Silverado online. At the GM dealership,  
15 Plaintiff Jamison reviewed the vehicle’s window sticker (aka “Monroney  
16 sticker”) before purchase. He also test drove his vehicle with a representative  
17 from the GM dealership. At no point did he see any disclosures or information  
18 regarding the Defect.

19 31. GM’s omissions were material to Plaintiff Jamison. Had GM  
20 disclosed its knowledge of the Defect before he purchased his vehicle, Plaintiff  
21 Jamison would have seen and been aware of the disclosures. Furthermore, had he  
22 known of the Defect, Plaintiff Jamison would not have purchased his vehicle, or  
23 would have paid less for it.

24 32. Plaintiff Jamison experienced the Chevy Shake immediately after  
25 purchase—well within GM’s bumper-to-bumper and powertrain warranties. His  
26 Silverado was violently shaking at approximately 50 to 55 miles per hour under  
27 acceleration, and above. The vehicle would make a groaning sound and shake  
28 violently. During this time, the center console would aggressively shake left to

1 right such that if a cup were placed in the console without a lid, it would spill.

2 33. Upon arriving home after leaving the dealership with his new  
3 vehicle, Mr. Jamison called the GM dealership and reported that the vehicle was  
4 vibrating. The GM dealership refused to provide Mr. Jamison with a loaner  
5 vehicle, and as Mr. Jamison's previously-scheduled vacation was imminent, he  
6 was unable to leave his vehicle with the dealership. Accordingly, the problems  
7 continued.

8 34. On or around January 24, 2019, with approximately 15,591 miles on  
9 the odometer, Mr. Jamison returned to the GM dealership complaining that his  
10 vehicle was vibrating at highway speeds. In response, the GM dealership  
11 inspected Mr. Jamison's vehicle with multiple pico scopes and duplicated Mr.  
12 Jamison's complaints. The GM dealership contacted Defendant for assistance.  
13 Ultimately, the GM dealership determined that Mr. Jamison's rear axle needed to  
14 be replaced. In addition, the GM dealership installed 2-degree axle shims. Mr.  
15 Jamison's vehicle was not returned to him until February 4, 2019. However,  
16 despite the repairs, Mr. Jamison's vehicle continues to vibrate. As discussed  
17 above, at highway speeds of 55 to 75 miles per hour and when under  
18 acceleration, the shaking is such that that if a cup were placed in the console  
19 without a lid, it would spill.

20 35. At all times, Plaintiff Jamison, like all Class Members, has driven  
21 his vehicle in a foreseeable manner, and he has not operated his vehicle in a  
22 manner that was unintended by GM. However, despite his normal and  
23 foreseeable driving, the Defect rendered his vehicle unsafe and unfit to be used  
24 as intended.

25 **Defendant**

26 36. Defendant General Motors LLC is a Delaware limited liability  
27 company with its principal place of business located at 300 Renaissance Center,  
28 Detroit, Michigan 48265. The sole member and owner of General Motors LLC is

1 General Motors Holdings LLC. General Motors Holdings LLC is a Delaware  
2 limited liability company with its principal place of business in the State of  
3 Michigan. General Motors Holdings LLC's only member is General Motors  
4 Company, a Delaware corporation with its principal place of business in the  
5 State of Michigan. General Motors Company has 100% ownership interest in  
6 General Motors Holdings LLC.

7 37. General Motors LLC itself, and through its affiliates, designs,  
8 manufactures, markets, distributes, services, repairs, sells, and leases passenger  
9 vehicles, including the Class Vehicles, nationwide and in California. General  
10 Motors LLC is the warrantor and distributor of the Class Vehicles in the United  
11 States.

12 38. At all relevant times, Defendant was and is engaged in the business  
13 of designing, manufacturing, constructing, assembling, marketing, distributing,  
14 and/or selling automobiles and motor vehicle components in California and  
15 throughout the United States of America.

16 **JURISDICTION AND VENUE**

17 39. This action is properly before this Court and this Court has subject  
18 matter jurisdiction over this action under the Class Action Fairness Act. At least  
19 one member of the proposed class is a citizen of a different state than GM, the  
20 number of proposed Class Members exceeds 100, and the amount in controversy  
21 far exceeds the sum or value of \$5,000,000.00 exclusive of interest and costs. 28  
22 U.S.C. § 1332(d)(2)(A).

23 40. This Court has general and specific jurisdiction over the Defendant  
24 because Defendant GM has sufficient minimum contacts with California and  
25 within the Central District of California to establish Defendant's presence in  
26 California, and certain material acts upon which this suit is based occurred  
27 within the Central District of California. GM does substantial business in the  
28 State of California and within this Judicial District, is registered to and is doing

1 business within the State of California, and otherwise maintains requisite  
2 minimum contacts with the State of California. Specifically, GM distributed  
3 Plaintiffs' Class Vehicles in California, and the vehicles remained in California  
4 and been registered in California since their original sale at authorized GM  
5 dealerships in California.

6 41. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)  
7 because Plaintiffs reside in the County of San Bernardino. In addition, Plaintiff  
8 Bostick's Declaration, as required under California Civil Code section 1780(d)  
9 but not pursuant to *Erie* and federal procedural rules, reflects that a substantial  
10 part of the events or omissions giving rise to the claims alleged herein occurred,  
11 or a substantial part of property that is the subject of this action, is situated in  
12 San Bernardino County, California. It is attached as Exhibit 1.

### 13 **FACTUAL ALLEGATIONS**

14 42. GM, through its dealerships, employees, agents, and servants, failed  
15 to disclose to Class Members and the public that the Class Vehicles contain an  
16 irreparable and defective drive shaft that renders the vehicles not fit for their  
17 intended purpose. This omission allowed Defendant GM to place the Class  
18 Vehicles in commerce and profit from their sales. However, GM knew from the  
19 time of manufacture that the drive shafts contained a dangerous, inherent Defect  
20 from the point of manufacture that caused the Class Vehicles to exhibit the  
21 "Chevy Shake."

22 43. The Defect is dangerous, causing violent shaking at highway speeds.  
23 This shaking can cause severe driver distraction and destabilize the steering and  
24 handling of the vehicles, which can contribute to auto accidents and personal  
25 injury.

26 44. The existence of the Defect is a material fact that a reasonable  
27 consumer would consider when deciding whether to purchase or lease a Class  
28 Vehicle. Had Plaintiffs and other Class Members known of the Defect, they

1 would have paid less for the Class Vehicles or would not have purchased or  
2 leased them.

3 45. Reasonable consumers, like Plaintiffs, expect that a vehicle's  
4 driveline is safe, will function in a manner that will not pose a safety risk, and is  
5 free from defects. Plaintiffs and Class Members further reasonably expect that  
6 GM will not sell or lease vehicles with known safety defects, such as the "Chevy  
7 Shake", and will disclose any such defects to its consumers when it learns of  
8 them. They did not expect GM to conceal and fail to disclose the Defect to them,  
9 and to then continually deny its existence

10 46. There is strong evidence that the aluminum drive shafts in the Class  
11 Vehicles are the source of the Defect in the Class Vehicles. Customers who have  
12 ordered, paid out of pocket for and installed custom-made steel drive shafts have  
13 reported that their repair was a complete fix. For instance, Bart Butler, an owner  
14 of a 2017 Silverado 1500 LTZ 2WD from Irvington, Alabama, reported in an  
15 online forum post that this fix worked for him after GM refused to provide an  
16 appropriate repair:

17  
18 GM will only replace it with another aluminum shaft. They did that  
19 for me and determined that the replacement shaft was only half as  
20 out of round as my original one. However that amount was within  
21 GM specs so no replacement of the Second shaft. Mind you they had  
22 already done tires, torque converter, etc with no success. I had less  
23 than 1000 miles on it. I could not afford to trade (8000 bucks for a  
24 2018) so I set about determining what part could be causing different  
25 vibrations at varying speeds. The driveshaft! So I contacted  
26 Performance Drivelines in Barstow CA and they made me a custom  
27 two piece steel driveshaft with a custom center support and bearing.  
28 They made it to 3/4 ton specs for my 1500. It cost me \$800 shipped  
to my door. Took me about 90 minutes to install in my driveway  
laying on my back! One test drive and I had a smooth as silk truck.  
It now has 15,000 miles more and still no vibrations. GM knows they  
have driveshaft problems but to recall would cost billions. They are  
content paying dealer to perform their slight of hand to appease

1 customers and buy back a few here and there. I lost my warranty on  
2 the driveshaft thru GM but at least I now have a truck I can enjoy for  
3 many more thousands of miles. I took it in for an oil change the other  
4 day and every tech came over to look at my solution. I noticed that  
5 my truck traveled 30 miles during that oil change! They drove it just  
6 to verify I was right!!!<sup>2</sup>

7 47. Others have reported that custom drive shaft replacements of a  
8 different design have solved the Defect.<sup>3</sup>

9 48. GM's notice of the Chevy Shake Defect derived from, among other  
10 things, GM's own knowledge about the material, design, and manufacture of the  
11 part; feedback, both directly and through its dealers, from its customers during  
12 repairs; complaints in the National Highway Transportation Safety  
13 Administration ("NHTSA") database beginning as early as 2014, if not earlier;  
14 online complaints in web forums and social media that are monitored by GM;  
15 and news reports.

16 49. GM had superior and exclusive knowledge of the Defect and knew  
17 or should have known that the Defect was not known or reasonably discoverable  
18 by Plaintiffs and Class Members before they purchased or leased the Class  
19 Vehicles.

20 50. Plaintiffs are informed and believe, and based thereon alleges, that  
21 before Plaintiffs purchased their Class Vehicles, and since 2014, if not earlier,  
22 GM knew about the Defect through sources not available to consumers,  
23 including Plaintiffs are informed and believe, and based thereon allege, that GM  
24 became aware of the Defect prior to Plaintiffs' acquisition of their Class  
25 Vehicles through sources not available to Plaintiffs and Class Members,

26 <sup>2</sup> <https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=2163675> (Oct. 19, 2018).

27 <sup>3</sup> See, e.g., <https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=2175870> (Nov. 24, 2018) (2015 Silverado);  
28 <https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=2176487> (Nov. 26, 2018) (2014 Silverado).

1 including, but not limited to: pre-production testing, pre-production design  
2 failure mode and analysis data, production design failure mode and analysis data,  
3 early consumer complaints made exclusively to GM's network of dealers and  
4 directly to GM, aggregate warranty data compiled from GM's network of  
5 dealers, testing conducted by GM in response to consumer complaints, and repair  
6 order and parts data received by GM from GM's network of dealers. GM also  
7 knew about the Defect through complaints made by consumers to NHTSA and  
8 other websites.

9 51. GM is experienced in the design and manufacture of consumer  
10 vehicles. As an experienced manufacturer, GM conducts tests, including pre-sale  
11 durability testing, on incoming components, including the drive shaft, to verify  
12 the parts are free from defect and align with GM's specifications.<sup>4</sup> Thus, GM  
13 knew or should have known the drive shaft was defective and prone to put  
14 drivers in a dangerous position due to the inherent risk of the Defect.

15 52. Defendant's warranty department similarly analyzes and collects  
16 data submitted by its dealerships to identify warranty trends in its vehicles. It is  
17 Defendant's policy that when a repair is made under warranty the dealership  
18 must provide GM with detailed documentation of the problem and a complete  
19 disclosure of the repairs employed to correct it. Dealerships have an incentive to  
20 provide detailed information to Defendant, because they will not be reimbursed  
21 for any repairs unless the justification for reimbursement is sufficiently detailed.

22 **A. GM's Technical Service Bulletins**

23 53. In its own Technical Services Bulletin "#PI1354C: Information on  
24 Vibration Analysis and Diagnostic - (Aug 14, 2015)," which was given to GM  
25 dealerships and other authorized agents but not GM consumers, GM admitted  
26

27 <sup>4</sup> Akweli Parker, *How Car Testing Works*, HOWSTUFFWORKS.COM,  
28 <http://auto.howstuffworks.com/car-driving-safety/safety-regulatory-devices/car-testing.htm>  
("The idea behind car testing is that it allows manufactures to work out all the kinks and  
potential problems of a model before it goes into full production.") (last viewed June 5, 2019).

1 that drive shafts could be a source of the problem and further admitted that  
2 “[t]here have been many cases of dented propeller shafts.” GM instructed its  
3 dealers to inspect the drive shaft as one possible source of the problem, noted  
4 that any dents or damage to the drive shaft requires replacement, but then  
5 permitted only replacement of its defective aluminum drive shaft with the same  
6 defective drive shaft.

7 54. GM’s December 2014 Service Bulletin “PI1354A,” an earlier  
8 version of the PI1354C bulletin, is an example of GM’s knowledge of the Chevy  
9 Shake Defect dating back to 2014, and is attached as Exhibit 2. This service  
10 bulletin likewise demonstrates GM’s knowledge of the drive shaft (or “prop  
11 shaft” or “propeller shaft”) issues.

12 55. In February of 2019, GM again updated this Service Bulletin to its  
13 tenth iteration, titled “#PI1354I - Information on Vibration Analysis and  
14 Diagnostic,” attached as Exhibit 3. This latest version of the bulletin  
15 demonstrates that the Chevy Shake continues to plague new vehicles, despite  
16 half a decade of service bulletins issued by GM regarding the issue. The PI1354  
17 Service Bulletin now applies to 2014 to 2019 Chevrolet Silverados and GMC  
18 Sierras. Furthermore, as evidenced in part by the consumer complaints and  
19 NHTSA VOQs [customer complaints to NHTSA] above, the same problem  
20 continues to affect 2015 to present Chevrolet Tahoe, Chevrolet Suburban, GMC  
21 Yukon, and Cadillac Escalade, all of which share the same architecture and parts  
22 with the 2014 - 2019 Silverado, including the defective drive shafts at issue.

23 **B. GM was aware of the Chevy Shake through Class Members’**  
24 **complaints to NHTSA**

25 56. Federal law requires automakers like GM to be in close contact with  
26 NHTSA regarding potential auto defects, including imposing a legal requirement  
27 (backed by criminal penalties) compelling the confidential disclosure of defects  
28 and related data by automakers to NHTSA, including field reports, customer

1 complaints, and warranty data. *See TREAD Act*, Pub. L. No. 106-414, 114  
2 Stat.1800 (2000).

3 57. GM has a legal obligation to identify and report emerging safety-  
4 related defects to NHTSA under the Early Warning Report requirements. *Id.*  
5 Similarly, on information and belief, GM monitors NHTSA databases for  
6 consumer complaints regarding their automobiles as part of their ongoing  
7 obligation to identify potential defects in their vehicles, including those which  
8 are safety-related. *Id.* Thus, GM knew the many complaints about Chevy Shake  
9 logged by NHTSA ODI (Office of Defects Investigation). The content,  
10 consistency, and disproportionate number of those complaints alerted, or should  
11 have alerted, GM to the Defect.

12 58. The NHTSA-ODI website allows consumers to identify and report  
13 problems with vehicle, tires, equipment or car seats. See  
14 <https://www.nhtsa.gov/recalls> (last accessed March 30, 2019) (“What happens to  
15 my complaint? Your complaint fuels our work. ... Your complaint will be added  
16 to a public NHTSA database .... If the agency receives similar reports from a  
17 number of people about the same product, this could indicate that a safety-related  
18 defect may exist that would warrant the opening of an investigation.”).

19 59. The NHTSA Office of Defects Investigation reviews and analyzes  
20 complaints to determine whether to issue recalls. The Vehicle Safety Complaint  
21 filing form specifically includes required fields for the name, telephone number,  
22 and email address for the complainant, in addition to the VIN number for the  
23 vehicle (which are apparently tested by an online database). *See* [https://www-  
24 odi.nhtsa.dot.gov/VehicleComplaint/](https://www-odi.nhtsa.dot.gov/VehicleComplaint/). NHTSA-ODI does not share complainants’  
25 personal information with the general public, and a complaint is added to a  
26 public NHTSA database only after it removes all information from complaint  
27 fields that personally identify a complainant. See <https://www.nhtsa.gov/recalls>.

28 60. NHTSA-ODI specifically states on its website that:

1 Government analysts review each complaint in a timely fashion. If  
2 warranted, the Office of Defects Investigation (ODI) will open an  
3 investigation to determine if a safety defect trend exists. Some of  
these investigations result in safety recalls.

4 While you may or may not be contacted by a NHTSA-ODI  
5 investigator to clarify the information submitted, all reports are  
reviewed and analyzed for potential defects trends.

6 Thus, NHTSA-ODI complaints are made by individuals who must identify  
7 themselves and enter detailed contact information and an accurate VIN number,  
8 and these complaints are reviewed and analyzed by the federal government.

9 61. With respect solely to the Class Vehicles, attached as Exhibit 4 are  
10 examples of the scores of complaints concerning Chevy Shake which are  
11 available through NHTSA's website, [www.safercar.gov](http://www.safercar.gov). Many of the complaints  
12 reveal that GM, through its network of dealers and repair technicians, has been  
13 made aware of the Defect, but has failed to diagnose or repair it. *See* Exhibit 4.

14 **C. GM was aware of the Chevy Shake through consumer**  
15 **complaints and news reports.**

16 62. Similarly, complaints posted by consumers in internet forums  
17 demonstrate that the Defect is widespread and dangerous and that it can manifest  
18 without warning and/or suitable repair. The complaints also indicate GM's  
19 awareness of the Defect how potentially dangerous it is for consumers. The  
20 following are a sample of consumer complaints posted in internet forums  
21 (spelling and grammar mistakes remain as found in the original).

22 63. One forum titled "Shake or Vibration Issues" on the website  
23 [www.gm-trucks.com](http://www.gm-trucks.com) has *thousands* of complaints from GM consumers about the  
24 Defect; at the time of access, it spanned 829 pages. In the first comment, which  
25 was registered on April 4, 2013, the driver complained of "a shake or vibration"  
26 in a brand new 2014 GM Sierra. *See* "Shake or Vibration Issues,"  
27 <https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/> (last  
28

1 accessed March 31, 2019).

2 64. On August 6, 2013, an authorized and verified GM representative—  
3 Jennifer T. of GM Customer Care—responded to the thread of consumers to say  
4 that GM could be of assistance. In the days that followed, a stream of other  
5 consumer complaints about the same issue in new 2014 GM vehicles flowed in,  
6 and GM Customer Care continued to respond, inviting assistance.

7 65. The original commenter and other consumers reported, however,  
8 that when they took their vehicles into GM dealerships, GM representatives were  
9 unable to diagnose and fix the Chevy Shake Defect. Consumers detailed that GM  
10 representatives would orally confirm the presence of the Defect after a test drive  
11 but then later misrepresent or omit the problem in written Repair Orders to avoid  
12 having to address it. For example, one commenter wrote on December 11, 2013:  
13 “Looking at my paper work last night, the service manager wrote ‘no vibration  
14 present at this time, let customer go’. This even after he road [sic] with me,  
15 confirmed the vibration, told me they were getting tons of these complaints, and  
16 that he was trying to get GM involved.”<sup>5</sup>

17 66. GM acknowledged the large volume of complaints and continued to  
18 provide vague reassurances without suggesting a concrete solution.<sup>6</sup>

19 67. The complaints describe the common Defect with tremendous  
20 similarity across models and model years. Below is a sampling from the forum at  
21 different points in time:

- 22
- 23 • “2014 GMC Sierra. ... I have the vibration also between 65-75mph.  
24 The passenger seat shakes like hell, the steering wheel has bad  
25 wobble.”

26 <sup>5</sup> See [https://www.gm-trucks.com/forums/topic/153186-shake-or-](https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=1382265)  
27 [vibration- issues/?do=findComment&comment=1382265](https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=1382265)

28 <sup>6</sup> [https://www.gm-trucks.com/forums/topic/153186-shake-or-](https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=1383513)  
[vibration- issues/?do=findComment&comment=1383513](https://www.gm-trucks.com/forums/topic/153186-shake-or-vibration-issues/?do=findComment&comment=1383513)

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- “2014 GMC 4x4 Z71 SLT Crew Build date 9/13. I dropped it off April 8th due to a vibration at all speeds in the steering wheel, once reaching 70mph a seat vibration started to become really noticeable and extremely noticeable as speed increase past 70. In conjunction an audible noise inside the cab developed at 75 that sounding like a metal on metal vibration at a high frequency and the cab was much louder. Became really noticeable at 80 and beyond.”
- “First post, ended up here hunting down a solution to the 70-80 mph shimmy my truck has intermittently. Truck is a SCSB Z71 4x4, 5.3 with the 3.42 gears, love the truck... hate the shake since i drive everyday on the interstate and i have to be doing 69 or less or 80 and above to keep my coffee from shaking out of the center console.”<sup>6</sup>
- “2014 GMC all-terrain package unresolved vibration issues started bringing this truck back to the dealership after 17 days of ownership. Rf tires no change, had really bad vibration in rear end at 80 mph .... had a customer service agent tell me there was nothing wrong with my truck so therefore they could not do anything for me ... I stood behind the GMC name for over 30 years unfortunately GM does not stand behind their customers or their products .”
- “Truck is at the shop again today. They are going to analyze with a vibration meter. I specifically stated the speed of vibration was 70 to 75 on highway. Vibration feels like it starts in steering wheel then feels like it moves to rear or the front is so bad it resonates the whole vehicle. ... I have 21000 miles on this vehicle and have been battling little vibrations since the get go, over the last 2 months it seems to have gotten worse. I should prepare myself for the inevitable ‘cant replicate’, ‘they all do this’, or ‘we can't go over 70mph’.”
- “I have a 2014 Chevrolet Silverado 1500 4x4 crew cab standard size bed with 20" Goodyear tires. I was starting to think I was the only one with this problem. I have been having the same experience with vibration at varied speeds around 75 to 85 mph.”
- “Truck is at the shop again today. They are going to analyze with a vibration meter. I specifically stated the speed of vibration was 70 to 75 on highway. Vibration feels like it starts in steering wheel then feels like it moves to rear or the front is so bad it resonates the whole vehicle. ... I have 21000 miles on this vehicle and have been battling little vibrations since the get go, over the last 2 months it seems to

1 have gotten worse. I should prepare myself for the inevitable 'cant  
2 replicate', 'they all do this', or 'we can't go over 70mph'."

- 3 • "I have a 2015 Z71 4x4 CC Sierra SLT 3.42 rear end that started  
4 vibrating at about 2k miles. It has Rancho quick lift rs9000 struts on  
5 the front and rs9000s in the rear. Aftermarket wheels and toyo at II  
6 tires. ... Truck still vibrates from 70 - 75 mph. ... I'm trying to arm  
7 myself with enough data to avoid multiple trips to the dealer where  
8 they just rf balance the tires over and over before actually looking at  
9 the rear end or other drive train components as the source. I won't  
10 accept 'normal operation' or 'they all do it' out of a \$55k truck."
- 11 • "I have the same vibration issues with my 2015 Sierra starts at 75mph  
12 had to dealer three times and going back again they keep balancing  
13 the tires and it doesnt fix it."
- 14 • "Just bought a 2016 LTZ CC Tuesday night, on my Wednesday work  
15 commute noticed the shaking around 65-75 MPH. ... [S]ad to see  
16 my 8 mile odometer truck in the shop already."
- 17 • "My 2016 Z71 Crew Cab has shook from day one. Now has 9K on  
18 it. Third trip to dealer and I took service manager for a ride. He seen  
19 and felt it and stated my entire passenger side door was shaking also.  
20 Speed of 70 mph up."
- 21 • "Holy Cow - I just purchased a 2014 short bed 4wd z71 and I  
22 noticed a bad shake from 65 mph - 75 mph the second day i had it. I  
23 ended up taking it to a shop the same day and having the tires  
24 balanced and I did notice that helped, but didn't solve the problem. I  
25 started fumbling through Google looking to see if this was a known  
26 issue and I found this thread. I read the first 10 pages before I  
27 realized there was 625 pages in this thread. I assume this is a huge  
28 and very common issue due to the fact of activity on this thread."
- "Sorry if this has been covered in this 600 page thread, but I have a  
few questions. I have started to notice vibrations at speeds of 65-75  
mph. I have a 2015 crew cab with about 6800 miles."
- "2016 Sierra Denali short box. 5.3L[.] Noticed a vibration with 26  
miles on it taking it off the lot. ... 75-80 MPH is the worst."
- "I purchased a 2016 Silverado Crew LTZ in Aug. The truck has  
2800mi. And has developing the 'chevy shake' ! ... I cant deny thats  
its there Just as described in all othe previous post from 2014- 2015

1 trucks , 50 and 70 mph and above. I had hoped this issue would have  
2 been resolved at this point!”

- 3 • “Dropped my 17' sierra off this morning for its first free oil change  
4 at 3k miles. I told them about the 72 mph shake. Service writer  
5 nodded his head and said that it is a known issue with the  
6 driveshafts.”
- 7 • “This is my first post, and I have read around 100 pages on this  
8 forum thread after buying my overstock new 2015 Silverado 1500  
9 Double Cab Z71 4x4 about 3 weeks ago. I have read about  
10 complaints, failed attempts, fixes, non issues, and how bad the  
11 quality of life now seems after buying a new truck that vibrates  
12 constantly. I must claim that my truck has a vibration that many  
13 have described. My truck vibrates right around 45 MPH and again  
14 between about 72 and 80 MPH.”
- 15 • “My '16 Z71 Silverado has been to the dealer twice, no success with  
16 getting rid of the shakes. Last visit was 10/25 when dealer tried to  
17 convince me the vibrations (+,- 45 MPH and 70 on up to +85) was  
18 due to the ‘aggressive tread’ of my Dueler A/Ts. That was after re-  
19 balancing the tires. After holding back my laugh and letting the  
20 service manager know I wasn't a total ... idiot, he said put another  
21 1000 miles on the truck, then call and make another appointment  
22 and they would switch tires/wheels off another truck and see if that  
23 helps.”
- 24 • “Well my new to me 2014 silverado high country has the shaker  
25 option also! so far I've owned a 2105 silverado double cab a 2015  
26 1500 LT z71 5.3l GMC Sierra crew cab 2014 1500 SLE  
27 5.3l Silverado high country crew cab 1500 5.3l THEY ALL  
28 SHAKE!! my current truck the high country has a more exact shake.  
Its at 45 mph and 75 mph.....almost exactly! i went through GM on  
my 2015 silverado and GMC sierra their tires not balancing is total  
garbage. their trucks never did this before i can't believe they are  
honestly telling people its tires.”
- “I took a 500 mile trip on an interstate road last weekend and the  
shaking [on the 2016 Silverado LTZ] was very evident at 70 mph  
and above. Feels to me like it comes from the rear so I lowered the  
driver's side mirror to look at the wheel. I can clearly see it wobbling  
ever so slightly to the exact frequency of my vibration.”

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- “This is my first post and after seeing the duration and number of pages on this one thread, I'm not hopeful that my issue will ever be resolved. I bought a 2016 GMC Denali 3500HD Crew DRW 4x4 on 3/31/16 (traded in a 2013 black 3500HD Denali Crew Dually 4x4 that never exhibited any vibration). I've had both steering wheel & wheel/tire vibration problems with this truck since I bought it new from Beck and Masten GMC in Houston, TX. ... The truck now has 17,999 miles and it still has the same issues - extreme vibration of entire vehicle at 60+mph and steering wheel vibration/wobble from 35+mph. The truck is back in the shop currently and the service manager left a voicemail on Friday that they had found one bent inside wheel in the rear. I'm frustrated beyond belief.”
- “Same issues for me. Speeds vary but most noticable at 70-78MPH. 2016 Crew Cab, 5.3L, 2x4, Stock Goodyears, had it to dealer 4 times, 4 road balances. Same story over and over. Bottle of water shakes in the center console, my backpack shakes while on the passanger seat, and i can even see the hood shake. So sick of this problem. Just turned 13k miles.”
- “Traded in my 2000 Silverado on a 2018. Double cab, LT Z71, 4WD, optional 20" wheels (5 star) with goodyear SR-As. It vibrates on the highway, starting around 50mph and peaking around 70-75 I'd say. I have been reading this thread but after realizing it is nearly 800 pages does anyone have a link to a wiki or an FAQ or some sort of summary on the issue? ... I'm going to wait since I don't want the dealership pointing to the new tires (which are not on the truck yet) as a possible culprit.”
- “[M]ine doesn't start until it hits 70 mph, then until about 76 it starts to die down, but like someone else said, this shouldn't be happening to a 45k + vehicle, especially for how long they've known about it. I've got a 2018 [GMC Sierra All-Terrain] with 1000 miles on it BTW.”
- “I just spent a ton of money on a truck and I’m getting the vibration. I’ve got a 2018 Sierra with about 1400 miles. My steering wheel was off, and got vibrations about 70 mph to 75. ... I travel on the highway everyday so I need to get it fixed or trade it in on a ram ....”

- 1 • “[T]est drove my 2018 Sierra SLT crew cab around Oct 28th and  
2 told them I felt the vibration at 65 mph. Not being aware that this  
3 was a chronic problem, I believed the salesman when he told me that  
4 they would balance the tires and that would get rid of it. I bought it  
5 on the 29th and immediately called them saying the problem was  
6 still there. ... The dealer says there is nothing else they can do, and  
7 GM won't accept that the product they sold me is defective.”
- 8 • “Just bought a new 2018 Silverado 1500 W/T model regular cab  
9 long bed. Got on the highway to take it home and it immediately  
10 started vibrating at about 63 mph and above, felt it in the steering  
11 wheel and the center console module.”
- 12 • “I have a 2018 regular cab long bed Work Truck Silverado ,V6 that  
13 has had the vibration issue since day one with seats and center  
14 console when driving above 60 MPH.”

15 68. In addition to describing the common Defect, customers in the same  
16 forum thread describe similar treatment at GM dealerships by which they are  
17 repeatedly misled about the source of the problem, compelled to pay substantial  
18 sums out-of-pocket for GM to diagnose and attempt to address the Defect with  
19 ineffective fixes, and they waste countless hours in the process:

- 20 • “I have been to the dealer that I purchased my 2014 Silverado Crew  
21 Cab LT 4x4 5.3 FOUR times now. First time, they replaced one tire.  
22 Second time, they road forced balanced my tires AGAIN. 3rd time I  
23 took the Service Manager for a ride. 4th time was to get all new  
24 tires. They put on Michelin tires this time. 265/65/18's. I still have  
25 the shake, however the speed at which it comes has moved now. It  
26 used to come around 72 mph. Now I can feel it intermittently  
27 starting around 45mph all the way past 80mph. Two weeks ago I  
28 wrote a letter to the head honcho of GM and I guess she just  
forwarded my letter to a rep. This rep called Monday and asked for  
my VIN #. I asked her that before I give it to her, would she tell me  
whether or not she has heard of this problem and she said yes. I was  
like, great, Maybe I'll get somewhere with her then. I also said that I  
heard that once we give our VIN #'s to GM that we would basically  
be blackballed from all dealerships regarding this problem. She said  
she never heard of that and that she would do her best to ensure that

1 this would be taken care of. She looked up my VIN# and said that  
2 there was a recall on my vehicle for a shudder in my tranny and also  
3 wanted to make sure that I understood that my Service Manager had  
4 not reported any of these problems to them, nor has he been in  
5 contact with GM. She said he also has not performed the recall that  
6 dates back to June. Today she called back. This time, she had  
7 informed me that the call was being recorded. Her demeanor had  
8 totally changed. CRAPPPPPPPPP! I knew I was doomed. She said  
9 that she contacted a closer dealership and that the service manager  
10 of that dealership would be in contact with me. She also told that  
11 service manager what my previous service manager had performed.  
12 He told her that those would of been the steps that he would of done.  
13 After she was done talking to me, I got a phone call from this new  
14 service manager. Right off the bat, he wanted to tell me that this  
15 shaking was a normal characteristic of a Silverado. That got my  
16 blood boiling as I thought that I might actually have an advocate on  
17 my side. I told him that if I was to come into his dealership it would  
18 be to get this fixed. If he was going to just look at the tires and  
19 nothing else, that he would be wasting my time. His attitude got  
20 worse and said for me not to come in as he would be just wasting  
21 my time.”

- 22 • “I have owned at least 4 Silverados over the past ten years with no  
23 issues. I came to the site to see if others were experiencing issues  
24 with the 2014 or 2015 Silverados. There appears to be much more  
25 than I thought. In August 2014, I bought a 2014 Z71, trading in my  
26 2011 model. While I was driving it home from the dealership and  
27 reaching about 40mph, I noticed a significant vibration. It felt like I  
28 was driving on a road full of pebbles. I called the dealership and  
they thought it was flat spots on the tires. Two weeks later same  
problem. Had the truck into the shop 4 different times, once for two  
straight weeks, over a 6 month period. Four technicians noticed the  
vibration but could not diagnose it. The rearend was replaced, the  
shocks were replaced, the tires were replaced, etc., etc. I finally got  
to the point where I filed a claim with GM. they COULD NOT fix  
the problem and GM gave me a new 2015 Z71. I had to pay the  
difference of MSRP which was \$800.00, but all my pmts up to this  
date were applied to the new truck. I was quite pleased with the  
2015 until I reached about 500 miles on the new truck. I noticed a  
vibration, same as the 2014 but only after I reached highway speeds,  
60mph and up. I thought I was being paranoid and tried to convince  
myself that it was not there. Well, my wife and I took a 400 mile trip

1 by highway, and about an hour into the trip, she asked me what was  
2 wrong with the truck. She was feeling vibration in her seat and  
3 floorboard. Now I am back where I started with the 2014 issues.  
4 During this same trip, I ran into a friend who had bought the 2015  
5 Silverado 2500HD. He said his truck vibrates to the point where his  
6 outside mirrors are shaking. Granted completely different truck but  
7 seems all too common among the GM trucks. He was bringing it  
8 back to the dealership.”

- 9 • “More run-around by GM. They continue to tell me that they will  
10 not buy-back the vehicle. They're talking out both sides of their  
11 mouth. They acknowledged that service bulletins have been issued,  
12 and in the same breath, they said they will not buyback the car since  
13 it is a 'normal operating function of the vehicle!' WHAT?!?!?!”
- 14 • “I just want to share my experience and how utterly disgusted I am  
15 at how GM is avoiding this vibration/shaking issue.

16 Two months ago, August 12th 2017 I bought what I thought was  
17 going to be a great arizona outdoor truck for camping and seeing the  
18 great outdoors. Truck is a chevy silverado 1500 4x4 dbl cab 5.3L.  
19 With 22k miles full factory warranty and CERTIFIED PRE  
20 OWNED.

21 After getting on the freeway at 65 mph I notice the center console  
22 and passenger seat rattling like crazy, I take it back to the selling  
23 dealership and they say oh yeah trucks been sitting awhile and  
24 rebalanced the tires. I leave and same thing, rattling and shaking and  
25 vibration at 65mph+.

26 I go back to the selling dealer ship to have the tires STOCK 275-  
27 55R20s road force balanced, tech gets out of the truck after test  
28 drive and says truck is still shaking and we think you have a bad tire  
GM doesnt want to pay for the tire, I call chevy corporate and they  
replace the tire. Tech at selling dealership suggests I get new tires.

Leave the dealership again and the same vibration and shake  
happens again on the same smooth NEWLY paved freeway, mind  
you the selling dealership is 35 miles from my house.

At this point Im pissed at go to a chevy dealership right by my  
house, we test drive and the tech sees the center console vibrating to

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where keys and cell phone wont stay in the holder.

He thinks its the tires, that was my final straw!!!

I go to discount tire and drop \$1700 bucks on BFF all terrains and new wheels. I ask them to road force balance right away and the readings come in well below GMs spec. TRUCK IS STILL VIBRATING AT 65mph +!

I go back to the chevy dealership by my house and I tell them new tires and wheels, same problem!

I finally convince them to Pico scope the truck and guess what, they come back with a tire issue. I leave the dealership, and go back to discount and they replace all four bff tires and road force the new tires again WELL BELOW GM SPEC and again, I have the same shake and vibration as. With the stock tires and wheels I bought the truck with.

I decide to do some research and consult with several professional driveline mechanics, THIS IS NOT A TIRE AND WHEEL ISSUE! I am bringing the truck to a driveline specialist next week and after the research Ive done, I know for a fact this is a driveline (axle, drive shaft, prop shaft) issue that clearly GM does not want to fix and theyll have you believe its tire and wheel.

Ive reached the end of my rope and if the driveline guy finds the problem, I guarantee you I will go back to the dealership and have it fixed because GM is definitely avoiding this problem and giving the dealerships the talking points and truck owners the tire and wheel BS.

I am stunned that GM wont step up with all these problems and do whats right.

We will see because to sell someone a vehicle under warranty and having to take off work 7 times to deal with this is a joke.

If I dont get this rectified, I will consider my options up to legal action. No one is able to ride passenger in my truck on road trips because of this problem, it makes my young kid sick, and the shaking is not acceptable!”

1           69. News reports have also detailed the pervasiveness and ubiquity of  
2 the Defect and GM’s refusal to provide a common fix.<sup>7</sup>

3                           **GM Has Actively Concealed the Defect**

4           70. Despite its knowledge of the Defect in the Class Vehicles, GM  
5 actively concealed the existence and nature of the Defect from Plaintiffs and  
6 Class Members. Specifically, GM failed to disclose or actively concealed at and  
7 after the time of purchase, lease, or repair:

- 8                   (a) any and all known material defects or material nonconformity  
9 of the Class Vehicles, including the Defect pertaining to the  
10 Chevy Shake.  
11                   (b) that the Class Vehicles, including the driveline, were not in  
12 good in working order, were defective, and were not fit for  
13 their intended purposes; and  
14                   (c) that the Class Vehicles were defective, despite the fact that  
15 GM learned of such Defects as early as 2014.

16           71. On information and belief, when consumers present their Class  
17 Vehicles to an authorized GM dealer for repairs related to the Chevy Shake,  
18 rather than repair the problem under warranty, GM dealers either inform  
19 consumers that their vehicles are functioning properly or conduct repairs that  
20

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21 <sup>7</sup> See, e.g., Jessica McMaster, “General Motors’ customers frustrated over shaking pickup  
22 trucks,” NBC News WPTV (July 7, 2017), available at  
23 [https://www.wptv.com/news/national/general-motors-customers-frustrated-over-shaking-in-](https://www.wptv.com/news/national/general-motors-customers-frustrated-over-shaking-in-pickup-trucks)  
24 [pick-up-trucks](https://www.wptv.com/news/national/general-motors-customers-frustrated-over-shaking-in-pickup-trucks); Stephen Elmer, “Mysterious, Unfixable ‘Chevy Shake’ Affecting Pickup  
25 Trucks Too,” AutoGuide.com (March 30, 2016), available at:  
26 [https://www.autoguide.com/auto-news/2016/03/the-mysterious-chevy-shake-is-affecting-](https://www.autoguide.com/auto-news/2016/03/the-mysterious-chevy-shake-is-affecting-pickup-trucks-now-too.html)  
27 [pick-up-trucks-now-too.html](https://www.autoguide.com/auto-news/2016/03/the-mysterious-chevy-shake-is-affecting-pickup-trucks-now-too.html) ; Aimee Picchi, “Is your GM vehicle making you sick?,” CBS  
28 News Moneywatch (Jan. 4, 2016), available at [https://www.cbsnews.com/news/is-your-gm-](https://www.cbsnews.com/news/is-your-gm-vehicle-making-you-sick/)  
[vehicle-making-you-sick/](https://www.cbsnews.com/news/is-your-gm-vehicle-making-you-sick/) ; Stephen Elmer, “There’s a Big Issue with GM’s SUV and No One  
Seems to Have a Solution,” AutoGuide.com (Dec. 16, 2015), available at:  
[https://www.autoguide.com/auto-news/2015/12/there-s-a-big-issue-with-gm-s-suvs-and-no-](https://www.autoguide.com/auto-news/2015/12/there-s-a-big-issue-with-gm-s-suvs-and-no-one-seems-to-have-a-solution.html)  
[one-seems-to-have-a-solution.html](https://www.autoguide.com/auto-news/2015/12/there-s-a-big-issue-with-gm-s-suvs-and-no-one-seems-to-have-a-solution.html) .

1 merely mask the Defect.

2 **D. GM systematically refuses to disclose the known Defect and**  
3 **refuses to honor its warranties to Class Members by repairing**  
4 **the known Defect.**

5 72. The Class Vehicles were sold with a 5-Year / 100,000-Mile  
6 Powertrain Limited Warranty that included coverage of drive shafts.

7 73. It is commonly understood that the drive shafts in sport utility  
8 vehicles and passenger trucks like the Class Vehicles should have an expected  
9 useful life of at least 75,000 miles. *See, e.g.*, Valerie Johnston, “How Long Does  
10 a Driveshaft Last?”, Your Mechanic, Jan. 14, 2016, available at  
11 <https://www.yourmechanic.com/article/how-long-does-a-driveshaft-last> (last  
12 accessed March 31, 2019). Reasonable consumers expect that a vehicle—and its  
13 safety features—to last at least this long. The typical car on the road in the  
14 United States is 11.5 years old. The number of vehicles that are 16 to 24 years  
15 old is 44 million. The number of vehicles on the road that are at least 25 years  
16 old is about 14 million.

17 74. A reasonable consumer must be upset over the substantial cost in  
18 time and money of attempting to diagnose and fix the Chevy Shake.

19 75. Many purchasers and lessees of Class Vehicles have spent hundreds  
20 or thousands of dollars on Defect-related repairs and related expenses.

21 76. The mileage and durational limitations in GM’s Powertrain Limited  
22 Warranty, as applied to Plaintiffs and Class Members, are unconscionable. GM  
23 knew about the inherent Defect in the drive shaft at various points, including: (1)  
24 when it designed and manufactured the drive shaft and performed pre-sale  
25 testing and validation, (2) when individuals began to lodge complaints with  
26 NHTSA as early as 2014, (3) when it saw and responded to complaints of the  
27 Defect beginning in the Fall of 2013, (4) when GM determined that many of the  
28 vehicles exhibiting the Defect had damaged drive shafts, (5) when GM did the

1 preliminary investigation before issuing a service bulletin regarding the class  
2 Defect in December of 2014, and (5) before Plaintiffs and the Class purchased  
3 their GM vehicles. Still, GM opted not to warn, disclose, or otherwise inform the  
4 potential or eventual purchasers about the Defect. GM continues to refuse  
5 disclosure of this known defect to this date on newly sold Class Vehicles.

6 77. GM has never disclosed the Defect to drivers or potential purchasers  
7 or lessees of Class Vehicles, and GM has never instructed its dealerships to  
8 disclose the Defect to drivers or potential purchasers or lessees of Class  
9 Vehicles.

10 78. The Defect was not known to or reasonably discoverable by the  
11 Plaintiffs and proposed Class Members before purchase or lease, or without  
12 experiencing the Defect first hand and exposing themselves to an unreasonable  
13 safety risk.

14 79. GM has remained publicly silent even as it has privately  
15 acknowledged the Defect, conducted internal investigations, and learned of  
16 thousands of complaints about Class Vehicles directly from its customers and  
17 from NHTSA.

18 80. As a result of GM's inaction and silence, many consumers are  
19 unaware that they purchased, and continue to drive, unsafe and unreliable  
20 vehicles. As GM knows, a reasonable person would consider the Defect  
21 important and would either not purchase or lease a vehicle with the Defect were  
22 the Defect disclosed in advance or would pay substantially less for the vehicle.  
23 Plaintiffs and the putative Class neither knew, nor could have known, about the  
24 defective nature of the drive shaft at the time they purchased their Class  
25 Vehicles. GM knowingly manufactured vehicles that contained an inherent  
26 defect but did not inform Plaintiffs of the problem when Plaintiffs agreed to  
27 purchase the Class Vehicle or any time thereafter. GM has vigorously refused to  
28 acknowledge that the drive shaft is the source of the Defect to avoid having to

1 pay for a replacement with a non-defective drive shaft under its Limited  
2 Powertrain Warranty. As such, GM’s material omission concerning the existence  
3 of the Defect rendered the warranty unconscionable as applied to Plaintiffs and  
4 Class Members.

5 **CLASS ACTION ALLEGATIONS**

6 81. Plaintiffs bring this lawsuit as a class action on behalf of themselves  
7 and all others similarly situated as members of the proposed Class pursuant to  
8 Federal Rules of Civil Procedure 23(a) and 23(b)(3). This action satisfies the  
9 numerosity, commonality, typicality, adequacy, predominance, and superiority  
10 requirements of those provisions.

11 82. The Class and Sub-Class are defined as:

12 **Class:** All individuals in the United States, excluding  
13 Florida, who purchased or leased any Class Vehicle,  
14 which includes the following models:

- 15 • 2015 to 2020 Cadillac Escalade
- 16 • 2014 to 2019 Chevrolet Silverado
- 17 • 2015 to 2020 Chevrolet Suburban
- 18 • 2015 to 2020 Chevrolet Tahoe
- 19 • 2014 to 2019 GMC Sierra
- 20 • 2015 to 2020 GMC Yukon or Yukon XL

21 **California Sub-Class:** All members of the Class who  
22 reside in the State of California.

23 **CLRA Sub-Class:** All members of the California Sub-  
24 Class who are “consumers” within the meaning of  
25 California Civil Code § 1761(d).

26 **Implied Warranty Sub-Class:** All members of the  
27 Class who purchased or leased their vehicles in the State  
28 of California.

83. Excluded from the Class and Sub-Classes are: (1) Defendant, any

1 entity or division in which Defendant has a controlling interest, and their legal  
2 representatives, officers, directors, assigns, and successors; (2) the Judge to  
3 whom this case is assigned and the Judge's staff; (3) any Judge sitting in the  
4 presiding state and/or federal court system who may hear an appeal of any  
5 judgment entered; and (4) those persons who have suffered personal injuries as a  
6 result of the facts alleged herein. Plaintiffs reserve the right to amend the Class  
7 and Sub-Class definitions if discovery and further investigation reveal that the  
8 Class and Sub-Class should be expanded or otherwise modified.

9       84. Numerosity: Although the exact number of Class Members is  
10 uncertain, and can only be ascertained through appropriate discovery, the number  
11 is significant enough such that joinder is impracticable. The disposition of the  
12 claims of these Class Members in a single action will provide substantial benefits  
13 to all parties and to the Court. The Class Members are readily identifiable from  
14 information and records in Defendant's possession, custody, or control, as well  
15 as from records kept by the Department of Motor Vehicles.

16       85. Typicality: Plaintiffs' claims are typical of the claims of the Class  
17 in that Plaintiffs, like all Class Members, purchased or leased a Class Vehicle  
18 designed, manufactured, and/or distributed by GM. The representative Plaintiffs,  
19 like all Class Members, have been damaged by Defendant's misconduct in that  
20 they have incurred or will incur the cost of repairing or replacing the defective  
21 drive shaft and/or related components. Furthermore, the factual bases of GM's  
22 misconduct are common to all Class Members and represent a common thread  
23 resulting in injury to the Class.

24       86. Commonality: There are numerous questions of law and fact  
25 common to Plaintiffs and the Class that predominate over any question affecting  
26 Class Members individually. These common legal and factual issues include the  
27 following:

- 28           (a) Whether Class Vehicles suffer from the Defect;

- 1 (b) Whether Chevy Shake constitutes an unreasonable safety risk;
- 2 (c) Whether Defendant knew about the Defect, if so, how long
- 3 Defendant has known of the Defect;
- 4 (d) Whether the Defect constitutes a material fact;
- 5 (e) Whether Defendant has had an ongoing duty to disclose the
- 6 Defect to Plaintiffs and Class Members;
- 7 (f) Whether Plaintiffs and the other Class Members are entitled
- 8 to equitable relief, including a preliminary and/or a permanent
- 9 injunction;
- 10 (g) Whether Defendant knew or reasonably should have known of
- 11 the Defect before it sold and leased Class Vehicles to Class
- 12 Members;
- 13 (h) Whether Defendant should be declared financially responsible
- 14 for notifying the Class Members of problems with the Class
- 15 Vehicles and for the costs and expenses of repairing and
- 16 replacing the defective drive shafts and/or their components;
- 17 (i) Whether Defendant is obligated to inform Class Members of
- 18 their right to seek reimbursement for having paid to diagnose,
- 19 repair, or replace their defective drive shafts and/or related
- 20 components;
- 21 (j) Whether Defendant breached the implied warranty of
- 22 merchantability pursuant to the Magnuson-Moss Warranty
- 23 Act;
- 24 (k) Whether Defendant breached the implied warranty of
- 25 merchantability pursuant to the Song-Beverly Act
- 26 (l) Whether Defendant breached its express warranties under
- 27 UCC section 2301; and
- 28 (m) Whether Defendant breached written warranties pursuant to

1 the Magnuson-Moss Warranty Act.

2 87. Adequate Representation: Plaintiffs will fairly and adequately  
3 protect the interests of the Class Members. Plaintiffs have retained attorneys  
4 experienced in the prosecution of class actions, including consumer and product  
5 defect class actions, and Plaintiffs intend to vigorously prosecute this action.

6 88. Predominance and Superiority: Plaintiffs and Class Members have  
7 all suffered, and will continue to suffer, harm and damages as a result of  
8 Defendant's unlawful and wrongful conduct. A class action is superior to other  
9 available methods for the fair and efficient adjudication of the controversy.  
10 Absent a class action, most Class Members would likely find the cost of  
11 litigating their claims prohibitively high and would therefore have no effective  
12 remedy. Because of the relatively small size of the individual Class Members'  
13 claims, it is likely that only a few Class Members could afford to seek legal  
14 redress for Defendant's misconduct. Absent a class action, Class Members will  
15 continue to incur damages, and Defendant's misconduct will continue unabated  
16 without remedy or relief. Class treatment of common questions of law and fact  
17 would also be a superior method to multiple individual actions or piecemeal  
18 litigation in that it will conserve the resources of the courts and the litigants and  
19 promote consistency and efficiency of adjudication.

20 **FIRST CAUSE OF ACTION**  
21 **(Violation of California's Consumers Legal Remedies Act,**  
22 **California Civil Code § 1750, et seq.)**  
23 **(On Behalf of the California Sub-Class)**

24 89. Plaintiffs incorporate by reference the allegations contained in the  
25 preceding paragraphs of this Complaint.

26 90. Plaintiffs bring this cause of action on behalf of themselves and the  
27 CLRA Sub-Class (CLRA Sub-Class).

28 91. Defendant is a "person" as defined by California Civil Code

1 § 1761(c).

2 92. Plaintiffs and the CLRA Sub-Class members are “consumers”  
3 within the meaning of California Civil Code § 1761(d) because they purchased  
4 or leased their Class Vehicles primarily for personal, family, or household use.

5 93. By failing to disclose and concealing the Chevy Shake from  
6 Plaintiffs and prospective CLRA Sub-Class members, Defendant violated  
7 California Civil Code § 1770(a), as it represented that the Class Vehicles had  
8 characteristics and benefits that they do not have and represented that the Class  
9 Vehicles were of a particular standard, quality, or grade when they were of  
10 another. *See* Cal. Civ. Code §§ 1770(a)(5) & (7).

11 94. Defendant’s unfair and deceptive acts or practices occurred  
12 repeatedly in Defendant’s trade or business, were capable of deceiving a  
13 substantial portion of the purchasing public, and imposed a serious safety risk on  
14 the public.

15 95. Defendant knew that the Class Vehicles suffered from an inherent  
16 defect, were defectively designed, and were not suitable for their intended use.

17 96. As a result of their reliance on Defendant’s omissions, owners  
18 and/or lessees of the Class Vehicles, including Plaintiffs, suffered an  
19 ascertainable loss of money, property, and/or value of their Class Vehicles.  
20 Additionally, as a result of the Defect, Plaintiffs and the CLRA Sub-Class  
21 members were harmed and suffered actual damages in that the Class Vehicles’  
22 drive shafts and related components are substantially certain to fail before their  
23 expected useful life has run. Plaintiffs would not have purchased the Class  
24 Vehicles that they did, or would have paid less than what they did, had they  
25 known of the existence of the Defect.

26 97. Defendant was under a duty to Plaintiffs and the CLRA Sub-Class  
27 members to disclose the defective nature of the vehicles and/or the associated  
28 repair costs because:

- 1 (a) Defendant was in a superior position to know the true state of  
2 facts about the safety Defect in the Class Vehicles;
- 3 (b) Plaintiffs and the CLRA Sub-Class members could not  
4 reasonably have been expected to learn or discover that their  
5 vehicles had a dangerous safety defect until it manifested; and
- 6 (c) Defendant knew that Plaintiffs and the CLRA Sub-Class  
7 members could not reasonably have been expected to learn of  
8 or discover the safety Defect.

9 98. In failing to disclose the Defect, Defendant knowingly and  
10 intentionally concealed material facts and breached its duty not to do so.

11 99. The facts Defendant concealed from or failed to disclose to  
12 Plaintiffs and the CLRA Sub-Class members are material in that a reasonable  
13 consumer would have considered them to be important in deciding whether to  
14 purchase or lease the Class Vehicles or pay less. Had Plaintiffs and the CLRA  
15 Sub-Class members known that the Class Vehicles were defective, they would  
16 not have purchased or leased the Class Vehicles or would have paid less for  
17 them.

18 100. Plaintiffs and the CLRA Sub-Class members are reasonable  
19 consumers who do not expect their vehicles to exhibit problems such as Chevy  
20 Shake. This is the reasonable and objective consumer expectation relating to a  
21 vehicle.

22 101. As a result of Defendant's conduct, Plaintiffs and the CLRA Sub-  
23 Class members were harmed and suffered actual damages in that, on information  
24 and belief, the Class Vehicles experienced and will continue to experience Chevy  
25 Shake.

26 102. As a direct and proximate result of Defendant's unfair or deceptive  
27 acts or practices, Plaintiffs and the CLRA Sub-Class members suffered and will  
28 continue to suffer actual damages.



1           110. Defendant knew the Class Vehicles were defectively designed or  
2 manufactured, would fail prematurely, and were not suitable for their intended  
3 use.

4           111. In failing to disclose the Defect, Defendant has knowingly and  
5 intentionally concealed material facts and breached its duty not to do so.

6           112. Defendant was under a duty to Plaintiffs and the CA Sub-Class  
7 members to disclose the defective nature of the Class Vehicles because:

8                   (a) Defendant was in a superior position to know the true state of  
9 facts about the safety Defect in the Class Vehicles; and

10                   (b) Defendant actively concealed the defective nature of the Class  
11 Vehicles and from Plaintiffs and the CA Sub-Class.

12           113. The facts Defendant concealed from or failed to disclose to  
13 Plaintiffs and the CA Sub-Class members are material in that a reasonable  
14 person would have considered them to be important in deciding whether to  
15 purchase or lease Class Vehicles. Had they known of the Defect, Plaintiffs and  
16 the other CA Sub-Class members would have paid less for Class Vehicles or  
17 would not have purchased or leased them at all.

18           114. Defendant continued to conceal the defective nature of the Class  
19 Vehicles even after Plaintiffs and the other CA Sub-Class members began to  
20 report problems.

21           115. Defendant's conduct was and is likely to deceive consumers.

22           116. Defendant's acts, conduct, and practices were unlawful, in that they  
23 constituted:

24                   (a) Violations of California's Consumers Legal Remedies Act;

25                   (b) Violations of the Song-Beverly Consumer Warranty Act;

26                   (c) Breach of Express Warranty under California law; and

27                   (d) Violations of the Magnuson-Moss Warranty Act;

28           117. By its conduct, Defendant has engaged in unfair competition and

1 unlawful, unfair, and fraudulent business practices.

2 118. Defendant's unfair or deceptive acts or practices occurred  
3 repeatedly in Defendant's trade or business and were capable of deceiving a  
4 substantial portion of the purchasing public.

5 119. As a direct and proximate result of Defendant's unfair and deceptive  
6 practices, Plaintiffs and the other CA Sub-Class members have suffered and will  
7 continue to suffer actual damages.

8 120. Defendant has been unjustly enriched and should be required to  
9 make restitution to Plaintiffs and the other CA Sub-Class members pursuant to  
10 §§ 17203 and 17204 of the Business & Professions Code.

11 **THIRD CAUSE OF ACTION**

12 **(Breach of Implied Warranty Pursuant to Song-Beverly**

13 **Consumer Warranty Act, California Civil Code §§ 1792 and 1791.1, *et seq.*)**

14 **(On Behalf of the Implied Warranty Sub-Class)**

15 121. Plaintiffs incorporate by reference the allegations contained in the  
16 preceding paragraphs of this Complaint.

17 122. Plaintiffs bring this cause of action against Defendant on behalf of  
18 themselves and the Implied Warranty Sub-Class (IW Sub-Class).

19 123. Defendant was at all relevant times the manufacturer, distributor,  
20 warrantor, and/or seller of the Class Vehicles. Defendant knew or had reason to  
21 know of the specific use for which the Class Vehicles were purchased or leased.

22 124. Defendant provided Plaintiffs and the IW Sub-Class members with  
23 an implied warranty that the Class Vehicles and their components and parts are  
24 merchantable and fit for the ordinary purposes for which they were sold.  
25 However, the Class Vehicles are not fit for their ordinary purpose of providing  
26 reasonably reliable and safe transportation because, *inter alia*, the Class Vehicles  
27 suffered from an inherent defect at the time of sale and thereafter and are not fit  
28 for their particular purpose of providing safe and reliable transportation.



1 preceding paragraphs of this Complaint.

2 131. Plaintiffs bring this cause of action on behalf of themselves and on  
3 behalf of the Class against Defendant.

4 132. For each Class Vehicle sold by GM, an express written warranty  
5 was issued which covered the vehicle, including but not limited to, the driveline  
6 and drive shaft, and GM warranted the vehicle to be free of defects in materials  
7 and workmanship at the time of purchase or lease.

8 133. Pursuant to its express and written warranties, GM warranted the  
9 Class Vehicles' powertrain, including the driveline and drive shaft, to be free of  
10 defects in design, materials, and workmanship and that repairs and other  
11 adjustments would be made by authorized dealers, without charge, to correct  
12 defects in materials or workmanship which occurred during the first 5 years or  
13 100,000 miles, whichever came first.

14 134. GM breached its warranties for the Class Vehicles as a result of the  
15 latent defects in the driveline; denying the Defect in the driveline when  
16 confronted with complaints of shuddering, shaking, or violent vibration; failing  
17 to repair the vehicles as warranted; and otherwise inadequately repairing the  
18 Defect through ineffective repairs or replacement of the defective drive shafts  
19 with an equally defective drive shaft.

20 135. Plaintiffs were not required to notify GM of the breach because  
21 affording GM a reasonable opportunity to cure its breach of written warranty  
22 would have been futile. Defendant was also on notice of the Defect from  
23 complaints and service requests it received from Class Members, from repairs  
24 and/or replacements of the drive shafts, and from other internal sources.

25 136. As a direct and proximate cause of Defendant's breach, Plaintiffs  
26 and the other Class members have suffered, and continue to suffer, damages,  
27 including economic damages at the point of sale or lease. Additionally, Plaintiffs  
28 and the other Class members have incurred or will incur economic damages at

1 the point of repair in the form of the cost of repair.

2 137. Plaintiffs and the other Class members are entitled to legal and  
3 equitable relief against Defendant, including actual damages, consequential  
4 damages, specific performance, attorneys' fees, costs of suit, and other relief as  
5 appropriate.

6 **FIFTH CAUSE OF ACTION**

7 **(Breach of Express Warranty under the Magnuson-Moss Warranty Act,**  
8 **15 U.S.C. § 2303 *et seq.*)**  
9 **(On Behalf of the Class)**

10 138. Plaintiffs incorporate by reference the allegations contained in the  
11 preceding paragraphs of this Complaint.

12 139. Plaintiffs bring this cause of action on behalf of themselves and on  
13 behalf of the Class against Defendant.

14 140. For each Class Vehicle sold by GM, an express written warranty  
15 was issued which covered the vehicle, including but not limited to, the driveline  
16 and drive shaft, and GM warranted the vehicle to be free of defects in materials  
17 and workmanship at the time of purchase or lease.

18 141. Pursuant to its express and written warranties, GM warranted the  
19 Class Vehicles' powertrain, including the driveline and drive shaft, to be free of  
20 defects in design, materials, and workmanship and that repairs and other  
21 adjustments would be made by authorized dealers, without charge, to correct  
22 defects in materials or workmanship which occurred during the first 5 years or  
23 100,000 miles, whichever came first.

24 142. GM breached its warranties for the Class Vehicles as a result of the  
25 latent defects in the driveline; denying the Defect in the driveline when  
26 confronted with complaints of shuddering, shaking, or violent vibration; failing  
27 to repair the vehicles as warranted; and otherwise inadequately repairing the  
28 Defect through ineffective repairs or replacement of the defective drive shafts

1 with an equally defective drive shaft.

2 143. Plaintiffs were not required to notify GM of the breach because  
3 affording GM a reasonable opportunity to cure its breach of written warranty  
4 would have been futile. Defendant was also on notice of the Defect from  
5 complaints and service requests it received from Class Members, from repairs  
6 and/or replacements of the drive shafts, and from other internal sources.

7 144. As a direct and proximate cause of Defendant's breach, Plaintiffs  
8 and the other Class members have suffered, and continue to suffer, damages,  
9 including economic damages at the point of sale or lease. Additionally, Plaintiffs  
10 and the other Class members have incurred or will incur economic damages at  
11 the point of repair in the form of the cost of repair.

12 145. Plaintiffs and the other Class members are entitled to legal and  
13 equitable relief against Defendant, including actual damages, consequential  
14 damages, specific performance, attorneys' fees, costs of suit, and other relief as  
15 appropriate.

16 **SIXTH CAUSE OF ACTION**

17 **(Breach of Implied Warranty under the Magnuson-Moss Warranty Act,**  
18 **15 U.S.C. § 2303 *et seq.*)**  
19 **(On Behalf of the Class)**

20 146. Plaintiffs incorporate by reference the allegations contained in the  
21 preceding paragraphs of this Complaint.

22 147. Plaintiffs bring this cause of action on behalf of themselves and the  
23 Class against Defendant.

24 148. The Class Vehicles are a "consumer product" within the meaning of  
25 the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(1).

26 149. Plaintiffs and Class Members are "consumers" within the meaning  
27 of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(3).

28 150. Defendant is a "supplier" and "warrantor" within the meaning of the

1 Magnuson-Moss Warranty Act, 15 U.S.C. § 2301(4)-(5).

2 151. GM impliedly warranted that the Class Vehicles were of  
3 merchantable quality and fit for use. This implied warranty included, among  
4 other things: (i) a warranty that the Class Vehicles were manufactured, supplied,  
5 distributed, and/or sold by GM would provide safe and reliable transportation;  
6 and (ii) a warranty that the Class Vehicles would be fit for their intended use  
7 while the Class Vehicles were being operated.

8 152. Contrary to the applicable implied warranties, the Class Vehicles at  
9 the time of sale and thereafter were not fit for their ordinary and intended  
10 purpose of providing Plaintiffs and Class Members with reliable, durable, and  
11 safe transportation. Instead, the Class Vehicles are defective, including the  
12 defective design of their drive shafts.

13 153. Defendant's breach of implied warranties has deprived Plaintiffs  
14 and Class Members of the benefit of their bargain.

15 154. The amount in controversy of Plaintiffs' individual claims meets or  
16 exceeds the sum or value of \$25,000. In addition, the amount in controversy  
17 meets or exceeds the sum or value of \$50,000 (exclusive of interests and costs)  
18 computed on the basis of all claims to be determined in this suit.

19 155. Defendant has been afforded a reasonable opportunity to cure its  
20 breach, including when Plaintiffs and Class Members brought their vehicles in  
21 for diagnoses and repair related to Chevy Shake.

22 156. As a direct and proximate cause of Defendant's breach of implied  
23 warranties, Plaintiffs and Class Members sustained and incurred damages and  
24 other losses in an amount to be determined at trial. Defendant's conduct  
25 damaged Plaintiffs and Class Members, who are entitled to recover actual  
26 damages, consequential damages, specific performance, diminution in value,  
27 costs, attorneys' fees, and/or other relief as appropriate.

28 157. As a result of Defendant's violations of the Magnuson-Moss

1 Warranty Act as alleged herein, Plaintiffs and Class Members have incurred  
2 damages.

3 **SEVENTH CAUSE OF ACTION**

4 **(For Unjust Enrichment)**

5 **(On Behalf of the Class)**

6 158. Plaintiffs incorporate by reference the allegations contained in the  
7 preceding paragraphs of this Complaint.

8 159. Plaintiffs bring this cause of action on behalf of themselves and the  
9 Class.

10 160. As a direct and proximate result of Defendant's failure to disclose  
11 known defects, Defendant has profited through the sale and lease of the Class  
12 Vehicles. Although these vehicles are purchased and leased through Defendant's  
13 agents, the money from the vehicle sales flows directly back to Defendant.

14 161. Additionally, as a direct and proximate result of Defendant's failure  
15 to disclose known defects in the Class Vehicles, Plaintiffs and Class Members  
16 have vehicles that require repeated, high-cost repairs that can and therefore have  
17 conferred an unjust substantial benefit upon Defendant.

18 162. Defendant has been unjustly enriched due to the known defects in  
19 the Class Vehicles through the use money paid that earned interest or otherwise  
20 added to Defendant's profits when said money should have remained with  
21 Plaintiffs and Class Members.

22 163. As a result of the Defendant's unjust enrichment, Plaintiffs and  
23 Class Members have suffered damages.

24 **RELIEF REQUESTED**

25 164. Plaintiffs, on behalf of themselves and all others similarly situated,  
26 request the Court to enter judgment against Defendant, as follows:

- 27 (a) An order certifying the proposed Class and Sub-Classes,  
28 designating Plaintiffs as named representatives of the Class,

- 1 and designating the undersigned as Class Counsel;
- 2 (a) A declaration that Defendant is financially responsible for
- 3 notifying all Class Members of the Defect;
- 4 (b) An order enjoining Defendant from further deceptive
- 5 distribution, sales, and lease practices with respect to Class
- 6 Vehicles; compelling Defendant to issue a voluntary recall for
- 7 the Class Vehicles pursuant to. 49 U.S.C. § 30118(a);
- 8 compelling Defendant to repair and eliminate the Defect from
- 9 every Class Vehicle; enjoining Defendant from selling the
- 10 Class Vehicles with the misleading information; and/or
- 11 compelling Defendant to reform its warranty, in a manner
- 12 deemed to be appropriate by the Court, to cover the injury
- 13 alleged and to notify all Class Members that such warranty
- 14 has been reformed;
- 15 (c) A declaration requiring Defendant to comply with the various
- 16 provisions of the Song-Beverly Act alleged herein and to
- 17 make all the required disclosures;
- 18 (d) An award to Plaintiffs and the Class for compensatory,
- 19 exemplary, and statutory damages, including interest, in an
- 20 amount to be proven at trial, except that for now, Plaintiffs do
- 21 not seek damages under the Consumers Legal Remedies Act;
- 22 (e) Any and all remedies provided pursuant to the Song-Beverly
- 23 Act, including California Civil Code section 1794;
- 24 (f) Any and all remedies provided pursuant to the Magnuson-
- 25 Moss Warranty Act;
- 26 (g) A declaration that Defendant must disgorge, for the benefit of
- 27 the Class, all or part of the ill-gotten profits it received from
- 28 the sale or lease of its Class Vehicles or make full restitution

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- to Plaintiffs and Class Members;
- (h) An award of attorneys’ fees and costs, as allowed by law;
- (i) An award of attorneys’ fees and costs pursuant to California Code of Civil Procedure § 1021.5;
- (j) An award of pre-judgment and post-judgment interest, as provided by law;
- (k) Leave to amend the Complaint to conform to the evidence produced at trial; and
- (l) Such other relief as may be appropriate under the circumstances.

**DEMAND FOR JURY TRIAL**

165. Pursuant to Federal Rule of Civil Procedure 38(b) and Central District of California Local Rule 38-1, Plaintiffs demand a trial by jury of all issues in this action so triable.

Dated: December 19, 2019

Respectfully submitted,  
**Capstone Law APC**

By: /s/ Steven R. Weinmann  
Steven R. Weinmann  
Tarek H. Zohdy  
Cody R. Padgett  
Trisha K. Monesi

Attorneys for Plaintiffs

/s/ Russell D. Paul  
Russell D. Paul  
Amey J. Park  
**BERGER MONTAGUE PC**

# **EXHIBIT 1**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

KIM BOSTICK and BRANDEN  
JAMISON, individually, and on  
behalf of a class of similarly situated  
individuals,

Plaintiffs,

v.

GENERAL MOTORS LLC, a  
Delaware corporation,

Defendant.

Case No.:

**DECLARATION OF KIM BOSTICK  
IN SUPPORT OF VENUE FOR  
CLASS ACTION COMPLAINT  
PURSUANT TO CIVIL CODE §  
1780(d)**

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**DECLARATION OF KIM BOSTICK**

I, Kim Bostick, declare under penalty of perjury as follows:

1. I make this declaration based upon my personal knowledge except as to those matters stated herein that are based upon information and belief, and as to those matters, I believe them to be true. I am over the age of eighteen, a citizen of the State of California, and a Plaintiff in this action.

2. Pursuant to California Civil Code §1780(d), this Declaration is submitted in support of Plaintiffs’ Selection of Venue for the Trial of Plaintiffs’ Cause of Action alleging violation of California’s Consumers Legal Remedies Act.

1. I reside in Morongo Valley, California, which is in the County of San Bernardino.

2. I purchased a new 2017 Chevrolet Silverado 1500 that is the subject of this lawsuit in California from Jessup Auto Plaza Chevrolet (“the GM dealership”), an authorized GM dealer in Cathedral City, California.

3. Based on the facts set forth herein, this Court is a proper venue for the prosecution of Plaintiffs’ Cause of Action alleging violation of California’s Consumers Legal Remedies Act because my 2017 Chevrolet Silverado 1500 that is the subject of this lawsuit is situated here and a substantial portion of the events giving rise to my claims occurred here.

4. I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct.

Executed on December 16, 2019, in Morongo Valley, California.

DocuSigned by:  
*Kim Bostick*  
957CDE8909F04F7...  
**Kim BOSTICK**

# **EXHIBIT 2**



# Service Bulletin

File in Section: -

Bulletin No.: PI1354A

Date: December, 2014

## PRELIMINARY INFORMATION

**Subject:** Information on Vibration Analysis and Diagnostic

**Models:** 2014 Chevrolet Silverado 1500  
2015 Chevrolet Silverado  
2014 GMC Sierra 1500  
2015 GMC Sierra

**Attention:** This PI also applies to any of the above models that may be Middle East, Chile, Peru and Thailand Export vehicles.

This PI has been revised to add the 2015 Model Year, update the Additional Notes for Testing Table, edit the Check Pinion Flange Runout Measurement procedure and updated the Example in the Backlash Adjustment Procedure. Please discard PI1354.

### Training Available

US Courseware			
Course	Delivery Platform	Course Description	Length
13042.14D1	Virtual Classroom Training (VCT)	Noise, Vibration and Harshness (NVH) 1	1.5 hrs
13042.14D2	Virtual Classroom Training (VCT)	Noise, Vibration and Harshness (NVH)	2.0 hrs
13042.14H	Hands-On Training (est. avl. December 2014)	Noise, Vibration and Harshness (NVH)	8.0 hrs
13042.12W	Web-Based Training	Noise, Vibration and Harshness (NVH)	2.0 hrs
13042.13V	Video On Demand (VOD)	PicoScope Noise, Vibration, and Harshness Diagnostics Overview	15:05 minutes
GMCL Courseware			
13042.12W	Web-Based Training	Noise, Vibration and Harness	—
13042.05D1	Virtual Classroom Training (VCT)	Noise Vibration & Harshness - Session 1	—
13042.05D2	Virtual Classroom Training (VCT)	Noise Vibration & Harshness - Session 2	—
13025.16H	Hands-On Training	Vibration Diagnosis (2 day classroom training)	—
13042.13V	Video On Demand (VOD)	PicoScope Noise, Vibration, and Harshness Diagnostics Overview - VOD	—

### Condition/Concern

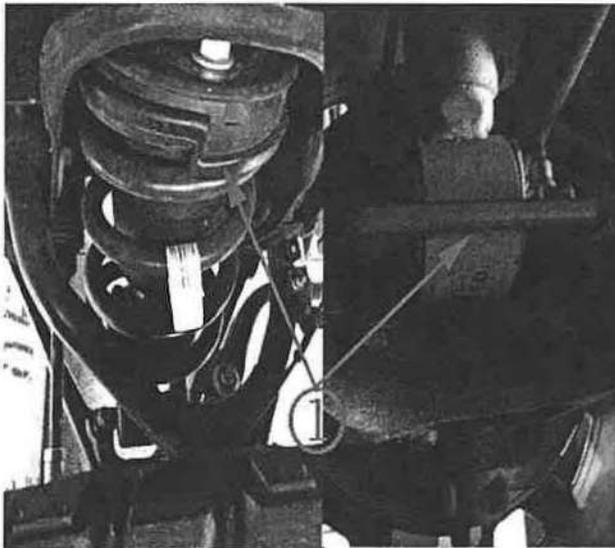
Some customers may comment about a vibration at speeds of 56-72 km/h (35-45 mph) or 96-120 km/h (60-70 mph), which can be felt in either the seat or steering wheel.

The purpose of this bulletin is to outline the recommendations and procedures for diagnosing and repairing vibrations caused by wheel and tire, axle components and/or propeller shafts.

## Recommendation/Instructions

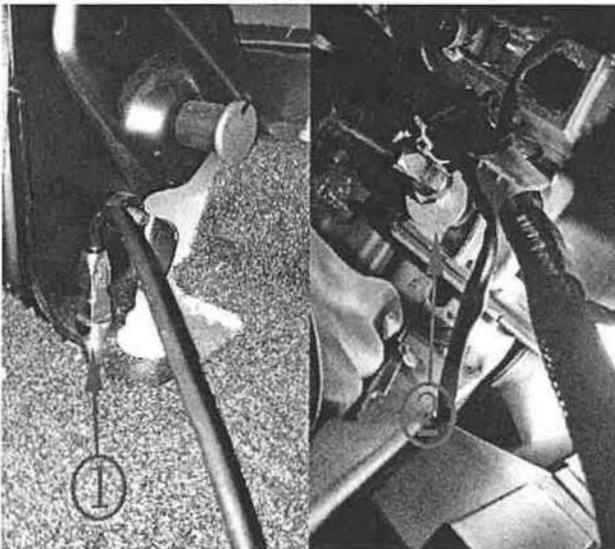
**Important:** The first step in determining the cause of the vibration is a test drive with the appropriate diagnostic equipment installed on the vehicle. If the correct tools and procedures are not followed, an incorrect diagnosis will result.

### Full Size Truck Vibration Analysis:



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1. Inspect the truck for any aftermarket equipment installations. For example: non factory tires, wheels and/or lift kits or leveling kits – shims (1) installed as shown above. Aftermarket equipment does include running boards, bug deflectors, and window shades, etc. Remove any aftermarket that might cause vibration transmission paths.
2. Mark each tire valve stems location on the tire. This will be utilized to check for tire slippage on the rim.



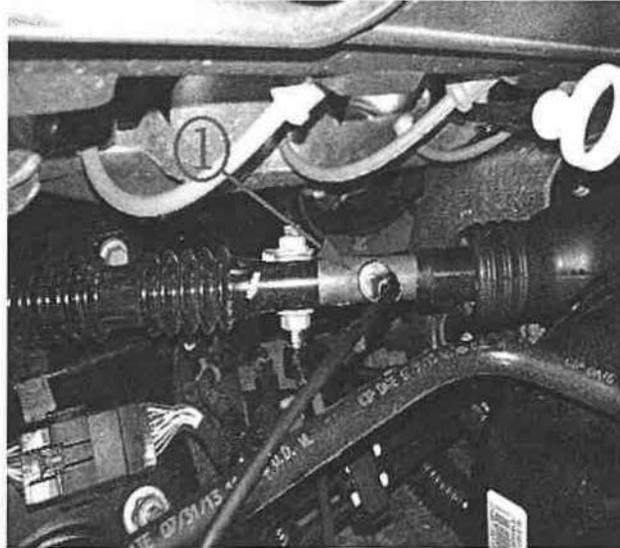
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3. Using a Pico Oscilloscope Diagnostic Kit, mount the PicoScope vibration sensor on one of the two locations shown above.

**Note:** Only the use of the Pico Oscilloscope Diagnostic Kit with NVH should be utilized, available from GM Dealer equipment (P/N 733-CH-51450). Previous vibrations tools are NOT recommended due to the types and frequencies producing these vibrations.

- Seat Vibration – mount the sensor to the rear seat bracket (1).
- Steering Wheel Vibration – mount the sensor to the steering wheel bracket (2) under dash.

**Note:** In some cases, moving the sensor from a vertical position to a horizontal position may indicate higher amplitude and may be beneficial to help in diagnosis.



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4. This step should be only be used if the vibration can be felt while running the vehicle on the rack. Mount the sensor on the steering shaft (1), under the hood as illustrated above.
5. Measure the vibration. Typically trucks should be driven in M5 to keep from switching in and out of active fuel management (AFM).

**Note: At the bottom of this bulletin is a required Vibration Diagnostic Worksheet that MUST be completed and is required for the claim payment. Vibration Diagnostic must be retained by the dealership. This worksheet is required to be filled out before calling TAC.**

6. After the road test, verify that the tires have not slipped on the rim (step #2). If slippage has been found, correct the condition prior to any other repair. Refer to the latest version of Corporate Bulletin Number 12-03-10-001: Vibration Shortly After Tires are Mounted/Preventing Vibration from Wheel Slip (Tire Sliding on Wheel).
7. Once the condition has been duplicated on a test drive and the vibration readings have been recorded, bring the vehicle back into the shop and test the vehicle on four jack stands or a suitable hoist. The hoist must support the suspension at the same trim heights as the vehicle would normally sit on the road.
8. With the vehicle properly supported, bring the speed up to the complaint speed and verify that the previously recorded vibration data matches current vibration data being displayed.
9. The test should be performed in both 2 wheel drive and 4 wheel drive, if equipped. If vibration can be duplicated on the rack, the test should be performed a second time with the wheels and tire assemblies removed from the vehicle and the wheel nuts installed to retain the brake discs and/or brake drums. If the vibration has been eliminated with the wheel and tire assemblies removed, focus on the wheel and tire assemblies as the source of the vibration. If the vibration is still present, focus on the vehicle driveline as the source of the vibration.

**Additional Notes for Testing**

- Phasing is typical on these tracks. Test drives should include many turns that can prevent phasing.
- Same test should be conducted after dealer correction to ensure vibration is eliminated throughout the entire test repair phase.

Use the chart below to determine which type of vibration the truck has and what repair procedure should be utilized.

Type of Vibration	Go to Condition
1st Order Tire	1
1st Order Prop Shaft	2
2nd Order Prop Shaft	3
3rd Order Tire Combined with 1st Order Prop	4
Vibration Felt in 4 cylinder mode (AFM) – V6 Engine Only	5
Vibration Felt at Idle Only	6*
*For rough idle and/or vibration at idle in gear – PIP5211: Rough Idle.	
*For vibration related to AFM in 4 cylinder mode – refer to PIP5228: Vibration During Active Fuel Management V4 Mode Operation 1200–1400 Engine RPM.	

**Important:** Prior to any Road Force Balancing done with the Hunter 9700, please make sure that the wheel assemblies pass the centering test, which is performed using the Hunter 9700 machine.

**Condition 1: 1st Order Tire Suggestions (Freq 11-14 hz at 60 mph or 97 km/h)**

**Measurements**

1. Remove the tire and wheel assemblies from the vehicle and perform the Road Force Variation (RFV) measurement.

**Important:** Prior to taking any measurements, the assemblies MUST all pass a center check.

**Note:** Rule of Thumb for vibrations.

- Steering Wheel = Front Wheels
  - Floor/Seat Track/Body = Rear Wheels
2. Document the before and after Road Force Variation (RFV) numbers on the vibration worksheet located at the end of this bulletin.

**Road Force Specifications**

P-Metric tires on passenger cars	15 lbs (6.8 kg) or less
P-Metric tires on light trucks	15 lbs (6.8 kg) or less
LT - tires on light trucks	15 lbs (6.8 kg) or less

**Note:** These numbers are lower than what is currently published in service information as some vehicles react to parts that are near the high limit. These numbers SHOULD NOT be used if you do not have a tire speed related disturbance.

**Repair:**

- For any assembly that has an out of balance condition (greater than 0.25 oz), remove the weights and correct the condition utilizing normal balancing techniques.
- For any assembly having RFV measurements beyond the specification above, vectoring the tire on the rim should be utilized prior to tire replacement. If this does not bring the assembly within specification, the tire should be replaced.

**Additional Notes on Balancing:**

- Always perform a centering check.
- The Hunter Balancer/Road Force Balancer should not be set to "Smart Weight."
- All tires need to be balanced under 0.25 oz (both static and dynamic).
- When using the Hunter – Balancer/Road Force Balancer, removal and remounting to the tire balancer should be performed to re-check balance and verify that results are repeatable to 0.25 oz or less.
- Check Wheel Runout.

**Important:** When replacing tires, the road force should be checked before a test drive and after a test drive (min of 10-15 miles or 16-24 km/h). Road force on new tires will change dramatically after being warmed up (as much as a 20 lb reduction). After the test drive, the tire's road force should be checked. If acceptable RFV cannot be achieved, first try vectoring the tire on the rim before an alternate tire is utilized. Also refer to the Information in the latest version of Corporate Bulletin Number 13-03-10-002: Diagnostic Tips for Difficult to Resolve Tire/Wheel Vibration Concerns. Some more information is needed on how to check the assemblies for 2nd, 3rd, and 4th order RFV.

**Condition 2: 1st Order Prop Shaft (Freq 38-44 hz at 60 mph or 97 km/h)**

**Perform Propeller Shaft Runout Measurement (Refer to the SI Document ID# 2084709)**

Specification	0.50"
Actual Measurement	
*For Best Result, the maximum runout should be under 0.20." If over, then replace the driveshaft.	

**Note:** These numbers are lower than what is currently published in service information as some vehicles react to parts that are near the high limit. These numbers SHOULD NOT be used if you do not have a propeller shaft speed related disturbance.

## Check Pinion Flange Runout Measurement

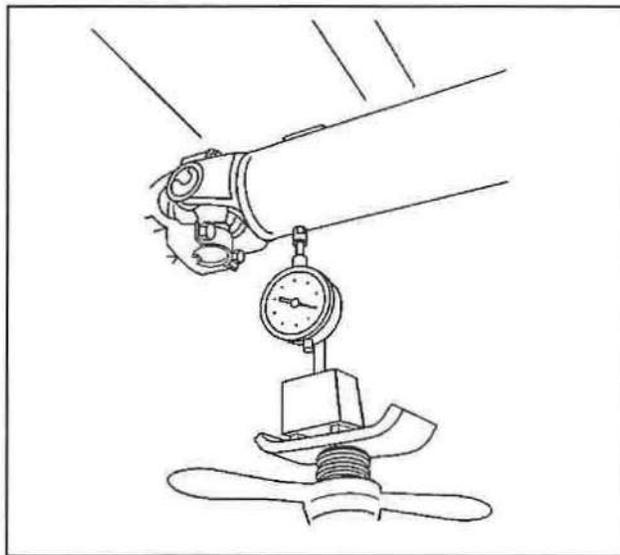
### Special Tools:

- GE-7872 Magnetic Base Dial Indicator Set, equivalent
- GE-8001 Dial Indicator Set, or equivalent

For equivalent regional tools, refer to the Special Tools and Equipment in SI.

### Note:

- This measurement procedure is intended to measure propeller shaft runout for prop shaft systems with 2 or 3 U-joints only. This is not for prop systems with only 1 U-joint, or with only constant velocity (CV) joints, and/or coupler assemblies.
  - When measuring runout of propeller shafts, do not include fluctuations on the dial indicator due to welds or surface irregularities.
1. Raise and support the vehicle with the wheels free to rotate. Refer to the Lifting and Jacking the Vehicle in SI.
  2. Place the transmission in NEUTRAL.
  3. Clean the circumference of the propeller shaft of any debris and/or undercoating along the rear of the shaft, where contact of the dial indicator will make to the propeller shaft.
  4. Inspect the propeller shaft for dents, damage, and/or missing weights. Any propeller shaft this is dented or damaged requires replacement.



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5. Mount the GE-7872 Magnetic Base Dial Indicator Set, or equivalent, or the GE-8001 Dial Indicator Set, or equivalent, to the vehicle underbody or to a service stand positioned just clear of the U-joint yoke weld on the prop shaft.
6. Rotate the drive pinion axle flange, torque tube input flange, transmission output, or transfer case output flange by hand while take runout measurements of the prop shaft. The prop shaft will rotate more easily in one direction than in the other. If necessary, the tire and wheel assemblies and even the brake caliper assemblies can be positioned and supported aside, or the brake drums can be removed from the drive axle to provide axle to provide easier rotation of the prop shaft.
7. Measure and mark the high spot of the propeller shaft. Mark the location of the propeller shaft to flange.
8. Rotate the propeller shaft 180 degrees from its original position on the flange.
9. Perform step six again.
10. If the high spot of the propeller shaft is in the same location as marked in the previous step and the measurement exceeds the maximum prop shaft runout specified, the prop shaft requires replacement before proceeding.

**Note:** This measurement is focused on pinion flange runout, it is NOT a complete measurement of the prop shaft runout. To fully measure prop shaft runout, measurements must be taken at the front and middle of each prop shaft segments.

11. If the high spot is in a different location, the runout is in the pinion flange or pinion. If this exceeds the maximum allowable runout for the pinion flange, the source of the runout (usually the flange or the pinion itself) must be found.

**Perform Balance Measurement using "Adjustment Procedure Using Oscilloscope" (PicoScope) (Refer to the SI Document ID# 3753593)**

Specification	10 g-cm
Actual Measurement	

For vehicles that are out of balance, perform a system balance. Using the two hose clamp method, the best driveline balance results are obtained under 10 g-cm.

**Suggestions:**

1. Perform Runout Measurement.
2. Disassembly/reassembly rear yoke joint – checks for shift in U-joint.
3. Evaluation Drive.
4. Perform Runout Measurement.
5. Index 180.
6. Evaluation Drive.
7. Perform Runout Measurement.
8. Evaluation Drive.
9. Balance Shaft with PicoScope.

**Diagnostic Aid:**

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- Inspect the propeller shaft for dents or damage. There have been many cases of dented propeller shafts.
- For 4WD Trucks, remove the rear propeller shaft, seal output shaft and drive the vehicle in 4WD. If the vibration is gone, the rear prop shaft could be the problem.
- For vehicles with a 3:08 with a one-piece steel shaft, this can be replaced with a one-piece aluminum one that is utilized on all 3:42 and 3:73 ratios (K15543 and K15753 Models only).
- PIP5140: Low Speed Vibration 30-35 mph (48-56 km/h).
- Inspect the transmission output shaft bushing for irregular wear.

**Condition 3: 2nd Order Prop Shaft (Normally a launch shudder or left under hard acceleration)**

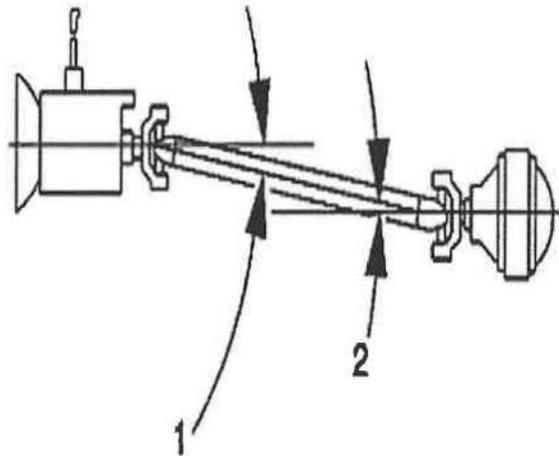
**Note:** Vehicle rear suspension must be properly supported during the Driveline Angle measurement process in order to record true Driveline Angle measurements.

**Check Driveline Angles (Refer to SI Document ID# 2084724)****Suggestion:**

1. Check Angle.
2. Disassembly/reassembly rear yoke – check for shift in U-joint.

3. Check Angle.
4. Evaluation Drive.

	Measurement	Notes:
Yoke to Shaft		The first (forward most) U-joint action on a two piece driveshaft system is not canceled out by another U-joint. Because of this, the first U-joint working angle should be between 0.5 and 0.75 degrees.
Front Shaft to Center Support Bearing (if equip)		U-joint pairs cancel each other. Neither U-joint working angle should exceed 4 degrees, nor the allowable range of difference between cancelling U-joint working angles is 0.00 to 1.0 degrees.
Shaft to Diff Yoke		



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Propeller systems containing only 1 U-joint: The U-joint working angle should be between 1/2 and 3/4 degrees. Allowable range of difference between cancelling U-joint working angles: 0.25 to 1.0 degrees.

### Shimming

**Important:** This is only be used for trucks that have incorrect working angles.

### Options:

1. Originally, trucks were built with a 14 mm spacers under the transfer case (4WD only). In some cases, reducing this shim to a 7 mm shim may correct the condition.
2. A 2 degree axle shim (P/N 23469809 – Qty 2) can be placed between the leaf spring pack and the axle perch. To rotate the pinion up to correct this; the “fat end” of the shim must face backwards, to the rear of the truck.

### Center Support Bearing - Two Piece Propeller Only

Change center support bearing shim from 12 mm (0.47 in) to 6 mm (0.24 in) using washers or other means. (If replacing the propeller, the new one will come with 6 mm or 0.24 in shim).

### Condition 4: 3rd Order Tire with 1st Order Prop

- 3rd Order Tire combined with 1st Order Prop. This type will create a phasing boom. Need to focus on the 1st Order Prop – condition above.

### Condition 5: Vibration Felt in 4 Cyl Mode (AFM) – V6 Engine Only

Several customers have commented on a vibration felt in the steering wheel or seat during 4 Cylinder Active Fuel Management (AFM) operation. This can be noticed more at 64-72 km/h (40-45 mph) and by lightly accelerating to the point where the engine transitions to 6 cylinders, or V6 mode.

- This type of vibration can be the result of exhaust cross pipe ground out and/or cab mount ground out.

To repair this condition, the three-way catalytic converter settling procedure in PIP5228: Vibration During Active Fuel Management V4 Mode Operation 1200–1400 Engine RPM should be completed.

**Condition 6: Vibration Felt at Idle Only**

- Refer to the PIP5137A: Rough Idle or Vibration In Drive.

**Other Sources of Vibrations**

1. Exhaust resonance – PI1201A: Exhaust Rattle, Buzz, Pop or Whistle.
2. Vibration during active fuel management V4 mode operation – PIP5228. Follow this cab mount settling procedure listed below:

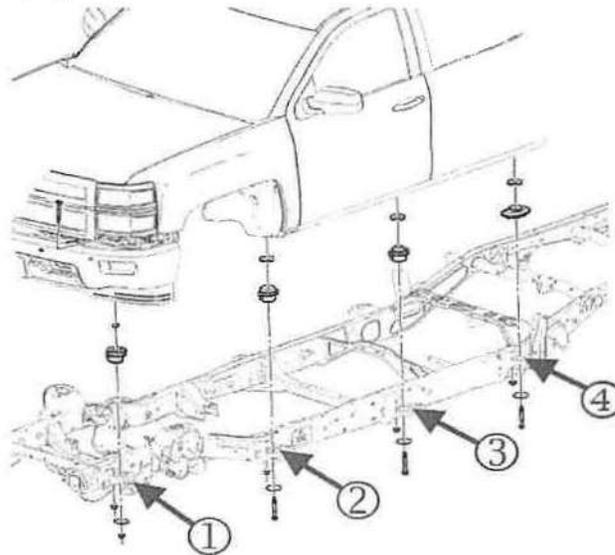
**Warning: When settling the body cushions, do NOT separate the frame from the body more than is necessary. Possible personal injury and damage to multiple parts may result if you do not follow the guides outlined below:**

- Intermediate steering shaft – Do not allow the shaft to extend more than 25 mm (1 in).
  - Fuel tank filler hose – Do not stretch the hose excessively.
  - Tail/Turn signal lamp wiring/rear lamps junction block – Leave slack in the wires
  - Park brake cable – Leave slack in the cable
  - Body ground straps – Leave slack in the wire
- The technician should first loosen the fastener located at the center of each body mount (6 for a regular cab, 8 for crew and double cab).
- Using a large angled pry bar, lift up the cab body slightly to settle / relax it. Perform this at each mount location one at a time.
- Repeat this cab mount settling process twice, to confirm the mounts are settled / relaxed.

Visually verify that the cab to box alignment is correct before re-torquing all mounts to specification found in Service Information, body repair, frame and under body section.

**The cab / body mount position location**

The numbers in the picture below indicate the specific mount position. The mounts on the passenger side of the vehicle are identified the same way. This will assist the technician to identify the correct location of each mount so they can be torque to the proper specification.



- 1 = body mount cushion front
- 2 = body mount cushion position number 1
- 3 = body mount cushion position number 2
- 4 = body mount cushion position number 3

3. Pitchline runout – Pitchline runout will normally show as a 1st order tire vibration on the PicoScope. If after correcting tire(s) with excessive Road Force, a vibration exists, remove differential cover and check ring gear backlash. Every tooth should be checked for excessive backlash. If there is more than 0.0762 mm (0.003 in) of variation, the ring gear and/or differential should be replaced to correct the condition (SI Document ID# 3269088, 3620298) (PIP4148A).

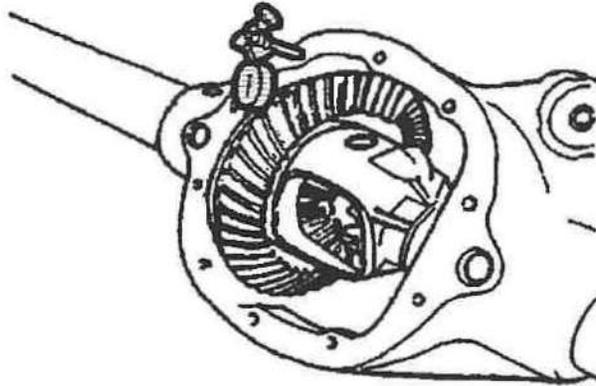
### Backlash Adjustment Procedure

#### Special Tools:

- J-8001 Dial Indicator Set
- J-25025 Guide Pins

#### Note:

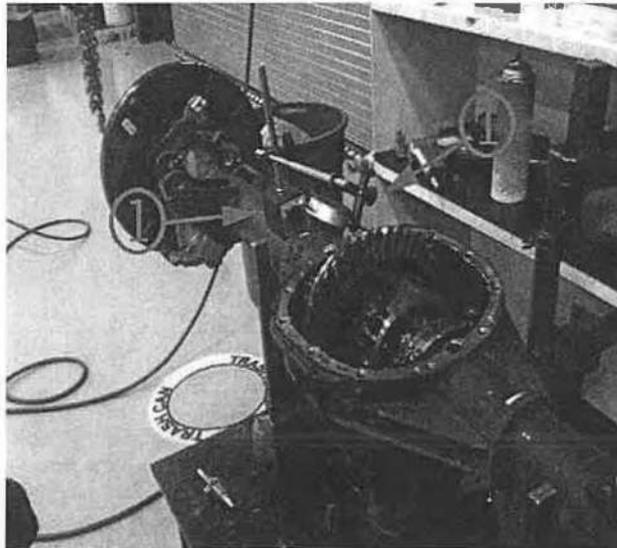
- Ensure that the side bearing surfaces in the axle housing are clean and free of burrs. If the original bearings are to be reused, the original bearing cups must also be used.
  - The differential side bearings must be initially preloaded in order to determine the backlash of the gear set. After the backlash is set, the final bearing preload is set.
  - Mark the bearing caps left or right sides.
1. Measure the rotating torque of the drive pinion and differential assembly. Refer to the Differential Drive Pinion Gear Bearing Replacement in SI.



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2. Install the J-25025 pins and the J-8001 indicator to the axle housing.

**Note:** Preload the dial of the J-8001-3 indicator approximately  $\frac{3}{4}$  of a turn and zero the gauge.



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**Note:** The illustration above is for reference only. The differential does NOT need to be removed from the vehicle.

3. Set the J-8001-3 indicator (1) so that the stem is aligned with the gear rotation (1) and square to the tooth angle.
4. Hold the drive pinion stationary and move the ring gear back and forth.
5. Repeat the measuring procedure at **each tooth** around the ring gear.

6. The difference between the backlash at all of the measuring points should not vary by more than 0.05 mm (0.002 in).
7. If the difference between the backlash at all of the measuring points varies by more than 0.05 mm (0.002 in), inspect for burrs, a distorted case flange or uneven bolting.
8. If the difference between all the measuring points is within specifications, the backlash at the minimum lash point measured should be 0.08-0.25 mm (0.003-0.010 in) with a preferred backlash of 0.13-0.18 mm (0.005-0.007 in).

**Note:**

- Increasing or decreasing the shim thickness by 0.05 mm (0.002 in) will change the backlash adjustment approximately 0.03 mm (0.001 in).
- If the backlash is less than, select a smaller shim than the one that was removed. For example, to INCREASE the backlash by 0.05 mm (0.002 in), select a shim that is 0.10 mm (0.004 in) thinner than the shim that was removed.
- If the backlash is larger than, select a larger shim than the one that was removed. For example, to DECREASE the backlash by 0.05 mm (0.002 in), select a shim that is 0.10 mm (0.004 in) thicker than the shim that was removed.

9. Install the selected shim.

**Caution:** Use the correct fastener in the correct location. Replacement fasteners must be the correct part number for that application. Do not use paints, lubricants, or corrosion inhibitors on fasteners, or fastener joint surfaces, unless specified. These coatings affect fastener torque and joint clamping force and may damage the fastener. Use the correct tightening sequence and specifications when installing fasteners in order to avoid damage to parts and systems. When using fasteners that are threaded directly into plastic, use extreme care not to strip the mating plastic part(s). Use hand tools only, and do not use any kind of impact or power tools. Fastener should be hand tightened, fully seated, and not stripped.

10. If the backlash is too small, increase the backlash using the following procedure:

- 10.1. Remove the bearing cap bolts and the bearing caps.

**Note:** Mark the bearing cups and the shims left or right.

- 10.2. Remove the differential case assembly with the bearing cups and the shims.

Note: Measure the production shim or the shim and service spacer in 3 locations.

Measure each shim separately.

- 10.3. Measure the thickness of left side shim pack.

**Note:** If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), remove 0.10 mm (0.004 in) of thickness from the left side shim pack.

- 10.4. Calculate the average of the 3 measurements for each shim.

**Note:** If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), remove 0.10 mm (0.004 in) of thickness from the left side shim pack.

- 10.5. Assemble a new left side shim pack by decreasing the appropriate amount of thickness from the original left side shim pack.

**Note:** Measure each shim separately.

- 10.6. Measure the thickness of right side shim or the shim and service spacer in 3 locations.

**Note:** Add the average of each of the shim measurements together. Record the measurement. This is the thickness for the right side shim pack.

- 10.7. Calculate the average of the 3 measurements for each shim.

- 10.8. Assemble a new right side shim pack by increasing the appropriate amount of thickness to the original right side shim pack. If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), add 0.10 mm (0.004 in) of thickness to the right side shim pack.

11. Use the following procedure to decrease the backlash if the backlash is too large:

- 11.1. Remove the bearing cap bolts and the bearing caps.

**Note:** Mark the bearing cups and the shims left or right.

- 11.2. Remove the differential case assembly with the bearing cups and the shims.

**Note:** Measure the production shim or the shim and service spacer in 3 locations. Measure each shim separately.

- 11.3. Measure the thickness of left side shim pack.

**Note:** Add the average of each of the shim measurements together. Record the measurement. This is the thickness for the left side shim pack.

11.4. Calculate the average of the 3 measurements for each shim.

11.5. Assemble a new left side shim pack by increasing the appropriate amount of thickness to the original left side shim pack. If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), add 0.10 mm (0.004 in) of thickness to the left side shim pack.

**Note:** Measure the shim or the shim and service spacer in 3 locations. Measure each shim separately.

11.6. Measure the thickness of right side shim pack.

**Note:** Add the average of each of the shim measurements together. Record the measurement. This is the thickness for the right side shim pack.

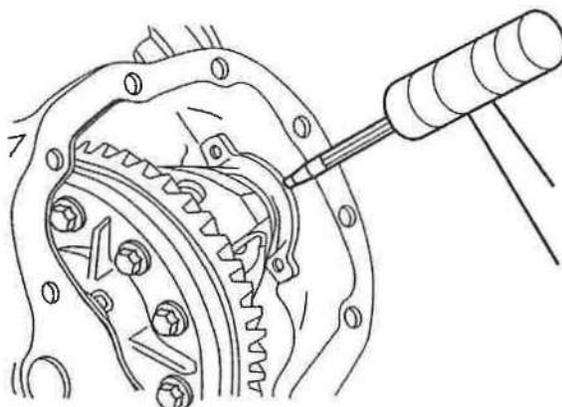
11.7. Calculate the average of the 3 measurements for each shim.

11.8. Assemble a new right side shim pack by decreasing the appropriate amount of thickness to the original right side shim pack. If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to decrease the backlash by 0.05 mm (0.002 in), remove 0.10 mm (0.004 in) of thickness to the right side shim pack.

12. Install the differential case assembly with the bearing cups.

13. Install the left side service shims between the axle housing and the differential case.

14. Install the right side service shims between the axle housing and the differential case.



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**Note:** The service spacers must be installed between the service shim(s) and the axle housing.

15. Using the brass drift for 9.5/9.76 axle, install the left side service spacer.

16. Recheck the backlash and adjust, if necessary.

17. Install the bearing caps and bolts and tighten to 85 Nm (63 lb ft).

18. Recheck the backlash and adjust, if necessary.

19. Once backlash is correct, perform a gear tooth contact pattern check in order to ensure proper alignment between the ring and pinion gears. Refer to the Gear Tooth Contact Pattern Inspection in SI.

**Note:** Recheck the backlash following the steps above to verify that the backlash is within specifications.

20. Tighten the differential bearing cap bolts to 85 Nm (63 lb ft).

21. Measure the drive pinion and differential case side bearing preload and adjust, if necessary following the steps above.

22. Once the backlash and bearing preload is correct, perform a gear tooth contact pattern check in order to ensure proper alignment between the ring and pinion gears. Refer to the Gear Tooth Contact Pattern Inspection in SI.

**Once all areas of vibrations has been reduced, if there is still vibration that the customer is concerned about, the following diagnosis maybe helpful to determine if a shock issue exists.**

**Warning:** *The following items should NOT be utilized until the source of the problem has been corrected.*

**Potential Vibration/Rough Ride:****Condition/Concern**

The shock issues below DO NOT cause a vibration, it will only make an existing vibration feel worse. In some cases, a vibration that would not normally be a customer concern may now be felt due to a bad shock. But in general, the original source of the vibration, whether it is the wheels, tires, propeller shaft, etc, will have to be corrected. When diagnosing a vibration issue, there have been reports of the shocks amplifying the vibration felt inside the truck. Engineering has found that some shocks may have been built with contaminated shock oil. This may cause the shocks to dampen incorrectly.

**This only applies to the following shocks:**

- Rear- Only trucks listed with the Z71 option (RPO Z71, these shocks will be white in color)

**Recommendation/Instructions:**

Two checks are needed to be performed to verify if the shocks could be an issue:

1. Check the date code located on the bottom of the shock. The first 8 digits are the GM part number. The next 5 digits are the supplier part number. The last 5 digits will be the date code. Any shock built before A1474 could have an issue. The date code format is as follows: 1st digit is the plant, next 3 digits are the day of the year and the last digit is the last number of the year.

**Example:**

- A14743C
- A = Plant
- 147 = 147th Day of the Year
- 4 = 2014
- 3C = Drawing Change Level

2. If the rear shocks are built before this date code, they will have to be removed for a dynamic test.

**Dynamic Test (Rear Shock – Z71 option only)**

Starting with a fully extended shock, compress the rod taking notice of the first 10 millimeters of travel. A good shock will not have any free play and there will be immediate resistance to being compressed. A shock with an issue will have several millimeters of free play (no resistance) before feeling the resistance from being compressed. Replace any shocks with excessive free play. In most cases, the rear shocks will be the issue.

**Warranty Information**

For vehicles repaired under warranty, use:

Labor Operation	Description	Labor Time
8080108*	Perform Road Force Measurement	0.9 hr
	Add time to vector each tire correction (Before and after Road force number should be noted on Vibration worksheet)	0.2 hr
3080088*	Perform Prop Shaft Measurement and Balance (two hose clamp method)	0.8 hr
8060420	Replace Tire(s)	Use Published Labor Operation Time
8033641	Front Shock Absorber, Shock Absorber Component, or Spring Replacement - Both Sides	1.2 hrs
8044751	Rear Shock Absorber Replacement - Both Sides	0.7 hr
*This is a unique Labor Operation for Bulletin use only. It will not be published in the Labor Time Guide.		

**Vibration Diagnostic Worksheet**

Vibration Felt In:		
Seat:	Steering Wheel:	Other:
Complaint Speed:		VIN:
Year:		Model:
Symptom:		
Engine:		Engine Speed:
Tire Brand:		Tire Size:

Axle Ratio:		Gear:	
TPC Spec:			
<b>Primary</b>			
Frequency:		Type (circle): T1 T2 T3 E1 E4 P1 P2	
		Other:	
Measurement of vibration is M/g's (# of runs? Peak, Average, and Avg of Peaks?)			
Source of Vibration (Based PICO)			
<b>Secondary</b>			
Frequency:		Type (circle): T1 T2 T3 E1 E4 P1 P2	
		Other:	
Measurement of vibration is M/g's (# of runs? Peak, Average, and Avg of Peaks?)			
Source of Vibration (Based PICO)			

**Condition 1: Road-Force measurements**

<b>Before Repairs</b>		
	<b>Ounces</b>	<b>Road Force (Lbs)</b>
Right Front		
Left Front		
Right Rear		
Left Rear		
<b>After Repairs</b>		
	<b>Ounces</b>	<b>Road Force (Lbs)</b>
Right Front		
Left Front		
Right Rear		
Left Rear		

# **EXHIBIT 3**



# Service Bulletin

Bulletin No.: PI1354I

Date: February, 2019

## PRELIMINARY INFORMATION

**Subject:** Information on Vibration Analysis and Diagnostic

**Models:** 2014 Chevrolet Silverado 1500  
 2015-2018 Chevrolet Silverado 1500  
 2019 Chevrolet Silverado LD \*  
 2014 GMC Sierra 1500  
 2015-2018 GMC Sierra 1500  
 2019 GMC Sierra Limited \*  
 EXCLUDES HD Trucks

\*Built at Oshawa Assembly Plant (11th VIN position "1") Attention: This PI also applies to any of the above models that may be North America Export to Middle East, Israel, Chile, Peru and Thailand vehicles.

This PI has been revised to add the 2019 Model Year, and include Vibration Diagnostic Worksheet instructions. Please discard PI1354H.

### Training Available

US Courseware			
Course	Delivery Platform	Course Description	Length
13042.14D1-R2	Virtual Classroom Training (VCT)	Noise, Vibration and Harshness (NVH) 1	1.5 hrs
13042.14D2-R2	Virtual Classroom Training (VCT)	Noise, Vibration and Harshness (NVH)	2.0 hrs
13042.14H-R2	Hands-On Training (est. avl. December 2014)	Noise, Vibration and Harshness (NVH)	8.0 hrs
13042.14W	Web-Based Training	Noise, Vibration and Harshness (NVH)	2.0 hrs
13042.13V	Video On Demand (VOD)	PicoScope Noise, Vibration, and Harshness Diagnostics Overview	15:05 minutes
GMCC Courseware			
13042.14W	Web-Based Training	Noise, Vibration and Harshness	—
13042.05D1	Virtual Classroom Training (VCT)	Noise Vibration & Harshness - Session 1	—
13042.05D2	Virtual Classroom Training (VCT)	Noise Vibration & Harshness - Session 2	—
13025.16H	Hands-On Training	Vibration Diagnosis (2 day classroom training)	—
13042.13V	Video On Demand (VOD)	PicoScope Noise, Vibration, and Harshness Diagnostics Overview - VOD	—

### Condition/Concern

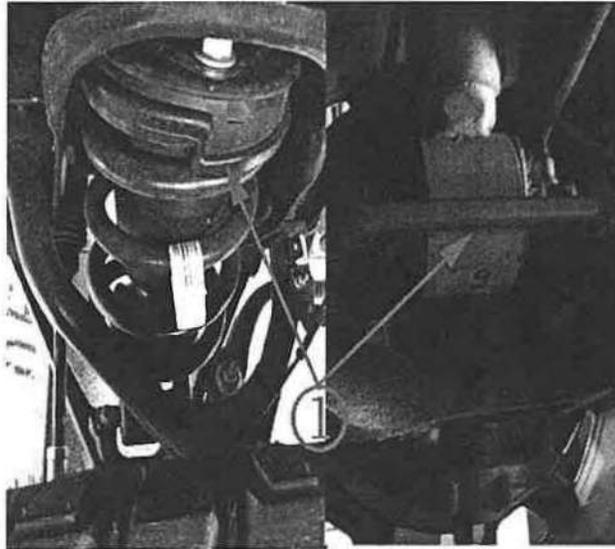
Some customers may comment about a vibration at speeds of 56-72 km/h (35-45 mph) or 96-120 km/h (60-70 mph), which can be felt in either the seat or steering wheel.

The purpose of this bulletin is to outline the recommendations and procedures for diagnosing and repairing vibrations caused by wheel and tire, axle components and/or propeller shafts.

## Recommendation/Instructions

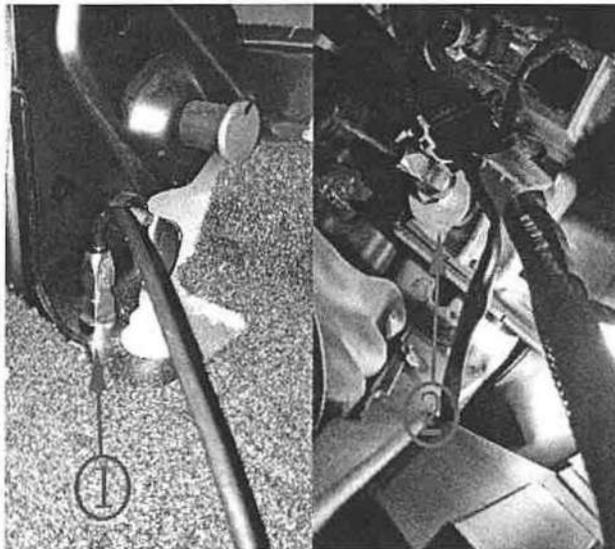
**Important:** The first step in determining the cause of the vibration is a test drive with the appropriate diagnostic equipment installed on the vehicle. If the correct tools and procedures are not followed, an incorrect diagnosis will result.

### Full Size Truck Vibration Analysis:



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1. Inspect the truck for any aftermarket equipment installations. For example: non factory tires, wheels and/or lift kits or leveling kits – shims (1) installed as shown above. Aftermarket equipment does include running boards, bug deflectors, and window shades, etc. Remove any aftermarket that might cause vibration transmission paths.
2. Mark each tire valve stems location on the tire. This will be utilized to check for tire slippage on the rim.



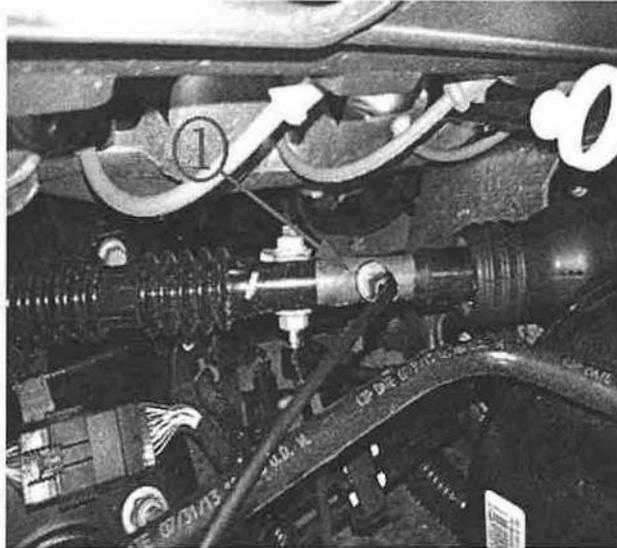
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3. Using a Pico Oscilloscope Diagnostic Kit, mount the PicoScope vibration sensor on one of the two locations shown above.

**Note:** Only the use of the Pico Oscilloscope Diagnostic Kit with NVH should be utilized, available from GM Dealer equipment (P/N 733-CH-51450). Previous vibrations tools are NOT recommended due to the types and frequencies producing these vibrations.

- Seat Vibration – mount the sensor to the front right corner of the driver's seat bracket (1).
- Steering Wheel Vibration – mount the sensor to the steering wheel bracket (2) under dash.

**Note:** In some cases, moving the sensor from a vertical position to a horizontal position may indicate higher amplitude and may be beneficial to help in diagnosis.



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4. This step should be only be used if the vibration can be felt while running the vehicle on the rack. Mount the sensor on the steering shaft (1), under the hood as illustrated above.
5. Measure the vibration. Typically trucks should be driven in M5 for 6 speed applications and M7 for 8 speed applications to keep the engine from switching in and out of active fuel management (AFM).

**Note: At the bottom of this bulletin is a required Vibration Diagnostic Worksheet that MUST be completed and is required for the claim payment. Vibration Diagnostic must be retained by the dealership. This worksheet is required to be filled out before calling TAC.**

6. After the road test, verify that the tires have not slipped on the rim (step #2). If slippage has been found, correct the condition prior to any other repair. Refer to the latest version of Corporate Bulletin Number 12-03-10-001: Vibration Shortly After Tires are Mounted/Preventing Vibration from Wheel Slip (Tire Sliding on Wheel).
7. Once the condition has been duplicated on a test drive and the vibration readings have been recorded, bring the vehicle back into the shop and test the vehicle on four jack stands or a suitable hoist. The hoist must support the suspension at the same trim heights as the vehicle would normally sit on the road.
8. With the vehicle properly supported, bring the speed up to the complaint speed and verify that the previously recorded vibration data matches current vibration data being displayed.
9. The test should be performed in both 2 wheel drive and 4 wheel drive, if equipped. If vibration can be duplicated on the rack, the test should be performed a second time with the wheels and tire assemblies removed from the vehicle and the wheel nuts installed to retain the brake discs and/or brake drums. If the vibration has been eliminated with the wheel and tire assemblies removed, focus on the wheel and tire assemblies as the source of the vibration. If the vibration is still present, focus on the vehicle driveline as the source of the vibration.

**Additional Notes for Testing**

- Phasing is typical on these trucks. Test drives should include many turns that can prevent phasing.
- Same test should be conducted after dealer correction to ensure vibration is eliminated throughout the entire test repair phase.

Use the chart below to determine which type of vibration the truck has and what repair procedure should be utilized.

Type of Vibration	Go to Condition
1st Order Tire	1
1st Order Prop Shaft	2
2nd Order Prop Shaft	3
3rd Order Tire Combined with 1st Order Prop	4
Vibration Felt in 4 cylinder mode (AFM) – V6 Engine Only	5
Vibration Felt at Idle Only	6*
*For rough idle and/or vibration at idle in gear – 17-NA-166: Rough Idle.	
*For vibration related to AFM in 4 cylinder mode – refer to PIP5228: Vibration During Active Fuel Management V4 Mode Operation 1200-1400 Engine RPM.	

**Important:** Prior to any Road Force Balancing done with the Hunter 9700, please make sure that the wheel assemblies pass the centering test, which is performed using the Hunter 9700 machine.

### Condition 1: 1st Order Tire Suggestions (Freq 11-14 hz at 60 mph or 97 km/h)

#### Measurements

Refer to Bulletin Number 17-NA-170: Information on Hunter Road Force Balancer.

1. Remove the tire and wheel assemblies from the vehicle and perform the Road Force Variation (RFV) measurement.

**Important:** Prior to taking any measurements, the assemblies MUST all pass a center check.

2. Document the before and after Road Force Variation (RFV) numbers on the vibration worksheet located at the end of this bulletin.

### Road Force Specifications

P-Metric tires on passenger cars	15 lbs (6.8 kg) or less
P-Metric tires on light trucks	15 lbs (6.8 kg) or less
LT - tires on light trucks	15 lbs (6.8 kg) or less

**Note:** These numbers are lower than what is currently published in service information as some vehicles react to parts that are near the high limit. These numbers **SHOULD NOT** be used if you do not have a tire speed related disturbance.

#### Repair:

- For any assembly that has an out of balance condition (greater than 0.25 oz), remove the weights and correct the condition utilizing normal balancing techniques.
- For any assembly having Radial Force Variation (RFV) measurements beyond the specification above, should be corrected utilizing the Hunter 180 Match Mount Process (See Hunter 180 Match Mount process below) prior to tire replacement. If this does not bring the assembly within specification, the tire should be replaced. The existing vectoring process cannot be utilized on Full size truck rims (except steel wheels) due to the removal of the out-board flange on the wheel which was utilized for the outboard rim runout measurement. Without this surface, an inaccurate rim runout measurement would exist and negatively affect the vectoring calculation.

#### Additional Notes on Balancing:

- Always perform a centering check.
- The Hunter Balancer/Road Force Balancer should not be set to "Smart Weight."
- All tires need to be balanced under 0.25 oz (both static and dynamic). In many cases, it may be helpful to add weight to only one plane at a time.
- When using the Hunter – Balancer/Road Force Balancer, removal and remounting to the tire balancer should be performed to re-check balance and verify that results are repeatable to 0.25 oz or less.
- Anytime a tire is removed from the wheel, the bare wheel should be mounted back on the vehicle and a runout check be performed on-vehicle. This process not only checks the wheel but also all mounting surfaces and suspension components that may effect runout.

**Important:** When replacing tires, the road force should be checked before a test drive and after a test drive (min of 10-15 miles or 16-24 km). Road force on new tires will change dramatically after being warmed up (as much as a 20 lb reduction). After the test drive, the tire's road force should be checked. If acceptable RFV cannot be achieved, first try vectoring the tire on the rim before an alternate tire is utilized. Also refer to the Information in the latest version of Corporate Bulletin Number 13-03-10-002: Diagnostic Tips for Difficult to Resolve Tire/Wheel Vibration Concerns. Some more information is needed on how to check the assemblies for 2nd, 3rd, and 4th order RFV.

#### Hunter 180 Match Mount Process

GM passenger cars have had some limited flangeless wheel applications in the past, but starting with the launch of the 2014 Light Duty Pickup, several new Flangeless wheels were introduced. Flangeless refers to the outboard flange of the wheel where previously a clip-on weight would attach. The new wheels do not have a machined flange for the Hunter Run-out Arm/Wheel to ride on. The previous process for tire and wheel assemblies that had high Road Force, was using the tire Force Matching process. This process requires the use of the Runout Measurement arms on the Hunter Road Force balancer. Without having this machined area, there is not a place for the Runout roller to measure. The Generation 3 and 4 RoadForce balancers have an alternate process called the 180 Match mount. On Gen IV machines this procedure can be found under RoadForce - Procedures - 180 Matching (or by selecting Match Mount without Rim Runout after initial RoadForce measurement).

This process does not use the Runout Arms and instead utilizes the Load Roller to optimize Road Force. While this process requires that the tire may need to be rotated up to 3 times on the rim to obtain the lowest Road Force number, it is the only way for the technician to match mount these wheel and tire assemblies reliably.

For more information on the 180 Matching process, please review the following Hunter Video that outlines the process. <https://youtu.be/nswttgUKstk>

### Replace Steering Bushings

*Double Cab and Crew Cab Models Only built prior to:*

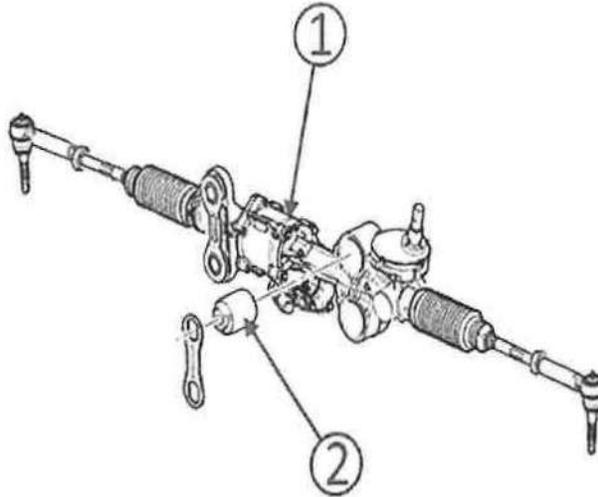
Silao – 11/3/16

Ft Wayne – 10/25/16

Flint – 9/30/16

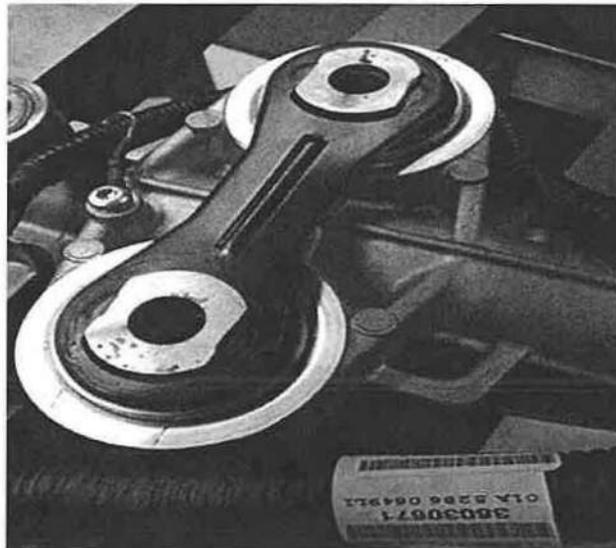
For Reg Cabs, see Replace Rear Cab Mounts below

**Important:** *The following procedure should only be used after all tire issues have been corrected. Installation of revised steering bushing will have little to no effect on trucks that still have tire conditions. The T1 vibration must be reduced to under 20-25m/g's for these bushings to be effective.*



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*A revised steering bushing (2) has been released to address customer vibration concerns. After various testing and measurement of the T1 vibration, a vibration path from the tie rods =>steering rack=>steering bushings=>frame=>Body Mount=>Cabin Floor=>Seat has been identified. To help isolate the steering rack (1), a revised hydraulic bushing has been released and tuned to the T1 frequency. The new steering bushing dampens minor T1 vibrations. This is the reason that the causal part (normally the Tire/Wheel Assembly) must be corrected first. If the T1 vibration is over 20-25m/g's, the bushings will have little to no effect.*



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*For vehicles with T1 vibrations under 20-25m/g's, replace steering bushing per parts catalogue. Utilize SI procedure "Steering Gear Mount Bushing Replacement" for replacement of the steering bushings.*

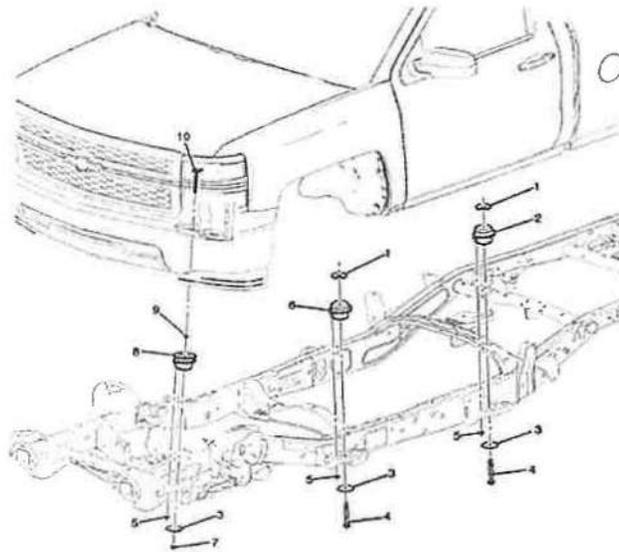
**Warning:** Care must be taken to not damage the EPS Motor electrical connectors or gear replacement may be required.

Description	Part Number	Qty
Steering Gear Bushing (CK10006 (SUV), K15743, K15543-NHT, K15753-NHT)	84234960	2
Steering Gear Bushing (C1004353, K15753 & NHT, K15543 & NHT)	84234959	2

**Replace Rear Cab Mounts - Regular Cab Models Built Prior To November 28, 2017**

A revised Rear Cab Mount has been released to address customer vibration concerns. After various testing and measurement of the T1 vibration, a vibration path from the tie rods =>steering rack=>steering bushings=>frame=>Body Mount=>Cabin Floor=>Seat has been identified. To help isolate the cab, a revised Cab Mount has been released and tuned to the T1 frequency. The new cab mount dampens minor T1 vibrations. This is the reason that the causal part (normally the Tire/Wheel Assembly) must be corrected first. If the T1 vibration is over 20-25m/g's, the cab mount will have little to no effect.

Correction: Replace Rear Cab Mount with Revised part number.



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Description	Part Number	Qty
CUSHION, BODY MT UPR LOCATION #2	84332391	2

**Condition 2: 1st Order Prop Shaft (Freq 38-44 hz at 60 mph or 97 km/h)**

Perform Propeller Shaft Runout Measurement (Refer to the SI Document ID# 2084709)

Specification	0.050**
Actual Measurement	
*For Best Result, the maximum runout should be under 0.20." If over, then replace the driveshaft.	

**Note:** These numbers are lower than what is currently published in service information as some vehicles react to parts that are near the high limit. These numbers SHOULD NOT be used if you do not have a propeller shaft speed related disturbance.

## Check Pinion Flange Runout Measurement

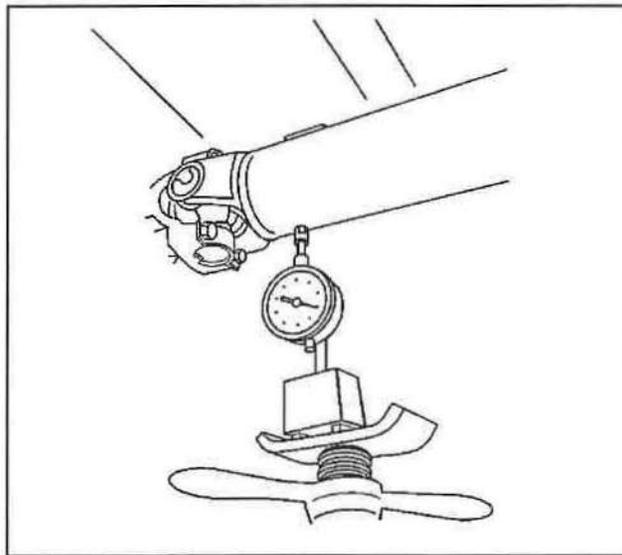
### Special Tools:

- GE-7872 Magnetic Base Dial Indicator Set, equivalent
- GE-8001 Dial Indicator Set, or equivalent

For equivalent regional tools, refer to the Special Tools and Equipment in SI.

### Note:

- This measurement procedure is intended to measure propeller shaft runout for prop shaft systems with 2 or 3 U-joints only. This is not for prop systems with only 1 U-joint, or with only constant velocity (CV) joints, and/or coupler assemblies.
  - When measuring runout of propeller shafts, do not include fluctuations on the dial indicator due to welds or surface irregularities.
1. Raise and support the vehicle with the wheels free to rotate. Refer to the Lifting and Jacking the Vehicle in SI.
  2. Place the transmission in NEUTRAL.
  3. Clean the circumference of the propeller shaft of any debris and/or undercoating along the rear of the shaft, where contact of the dial indicator will make to the propeller shaft.
  4. Inspect the propeller shaft for dents, damage, and/or missing weights. Any propeller shaft this is dented or damaged requires replacement.



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5. Mount the GE-7872 Magnetic Base Dial Indicator Set, or equivalent, or the GE-8001 Dial Indicator Set, or equivalent, to the vehicle underbody or to a service stand positioned just clear of the U-joint yoke weld on the prop shaft.
6. Rotate the drive pinion axle flange, torque tube input flange, transmission output, or transfer case output flange by hand while take runout measurements of the prop shaft. The prop shaft will rotate more easily in one direction than in the other. If necessary, the tire and wheel assemblies and even the brake caliper assemblies can be positioned and supported aside, or the brake drums can be removed from the drive axle to provide easier rotation of the prop shaft.
7. Measure and mark the high spot of the propeller shaft. Mark the location of the propeller shaft to flange.
8. Rotate the propeller shaft 180 degrees from its original position on the flange.
9. Perform step six again.
10. If the high spot of the propeller shaft is in the same location as marked in the previous step and the measurement exceeds the maximum prop shaft runout specified, the prop shaft requires replacement before proceeding.

**Note:** This measurement is focused on pinion flange runout, it is NOT a complete measurement of the prop shaft runout. To fully measure prop shaft runout, measurements must be taken at the front and middle of each prop shaft segments.

11. If the high spot is in a different location, the runout is in the pinion flange or pinion. If this exceeds the maximum allowable runout for the pinion flange, the source of the runout (usually the flange or the pinion itself) must be found.

**Perform Balance Measurement using “Adjustment Procedure Using Oscilloscope” (PicoScope) (Refer to the SI Document ID# 3753593)**

Specification	10 g-cm
Actual Measurement	

For vehicles that are out of balance, perform a system balance. Using the two hose clamp method, the best driveline balance results are obtained under 10 g-cm.

**Suggestions:**

1. Perform Runout Measurement.
2. Disassembly/reassembly rear yoke joint – checks for shift in U-joint.
3. Evaluation Drive.
4. Perform Runout Measurement.
5. Index 180.
6. Evaluation Drive.
7. Perform Runout Measurement.
8. Evaluation Drive.
9. Balance Shaft with PicoScope.

**Diagnostic Aid:**



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- Inspect the propeller shaft for dents or damage. There have been many cases of dented propeller shafts.
- For 4WD Trucks, remove the rear propeller shaft, seal output shaft and drive the vehicle in 4WD. If the vibration is gone, the rear prop shaft could be the problem.
- For vehicles with a 3:08 with a one-piece steel shaft, this can be replaced with a one-piece aluminum one that is utilized on all 3:42 and 3:73 ratios (K15543 and K15753 Models only).
- PIP5140: Low Speed Vibration 30-35 mph (48-56 km/h).
- Inspect the transmission output shaft bushing for irregular wear.

**Condition 3: 2nd Order Prop Shaft (Normally a launch shudder or left under hard acceleration)**

**Note:** Vehicle rear suspension must be properly supported during the Driveline Angle measurement process in order to record true Driveline Angle measurements.

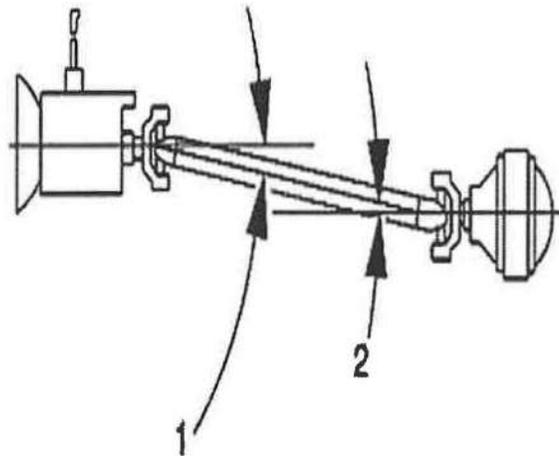
**Check Driveline Angles (Refer to SI Document ID# 2084724)**

**Suggestion:**

1. Check Angle.
2. Disassembly/reassembly rear yoke – check for shift in U-joint.

3. Check Angle.
4. Evaluation Drive.

	Measurement	Notes:
Yoke to Shaft		The first (forward most) U-joint action on a two piece driveshaft system is not canceled out by another U-joint. Because of this, the first U-joint working angle should be between 0.5 and 0.75 degrees.
Front Shaft to Center Support Bearing (if equip)		U-joint pairs cancel each other. Neither U-joint working angle should exceed 4 degrees, nor the allowable range of difference between cancelling U-joint working angles is 0.00 to 1.0 degrees.
Shaft to Diff Yoke		



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Propeller systems containing only 1 U-joint: The U-joint working angle should be between 1/2 and 3/4 degrees. Allowable range of difference between cancelling U-joint working angles: 0.25 to 1.0 degrees.

**Shimming**

**Important:** This is only be used for trucks that have incorrect working angles.

**Options:**

1. Trucks were built prior to 1/1/2015 had a 14 mm spacers under the transfer case (4WD only). Starting with 1/1/2015. The shim was reduce to 7 mm shim which may correct the condition.
2. A 2 degree axle shim (P/N 23469809 – Qty 2) can be placed between the leaf spring pack and the axle perch. To rotate the pinion up to correct this; the "fat end" of the shim must face backwards, to the rear of the truck.

**Center Support Bearing - Two Piece Propeller Only**

Change center support bearing shim from 12 mm (0.47 in) to 6 mm (0.24 in) using washers or other means. (If replacing the propeller, the new one will come with 6 mm or 0.24 in shim).

**Condition 4: 3rd Order Tire with 1st Order Prop**

- 3rd Order Tire combined with 1st Order Prop. This type will create a phasing boom. Need to focus on the 1st Order Prop – condition above.

**Condition 5: Vibration Felt in 4 Cyl Mode (AFM) – V6 Engine Only**

Several customers have commented on a vibration felt in the steering wheel or seat during 4 Cylinder Active Fuel Management (AFM) operation. This can be noticed more at 64-72 km/h (40-45 mph) and by lightly accelerating to the point where the engine transitions to 6 cylinders, or V6 mode.

- This type of vibration can be the result of exhaust cross pipe ground out and/or cab mount ground out.

To repair this condition, the three-way catalytic converter settling procedure in PIP5228: Vibration During Active Fuel Management V4 Mode Operation 1200–1400 Engine RPM should be completed.

**Condition 6: Vibration Felt at Idle Only**

- Refer to the PIP5137: Rough Idle or Vibration In Drive.

**Other Sources of Vibrations**

1. Exhaust resonance – PI1201: Exhaust Rattle, Buzz, Pop or Whistle.
2. Vibration during active fuel management V4 mode operation – PIP5228. Follow this cab mount settling procedure listed below:

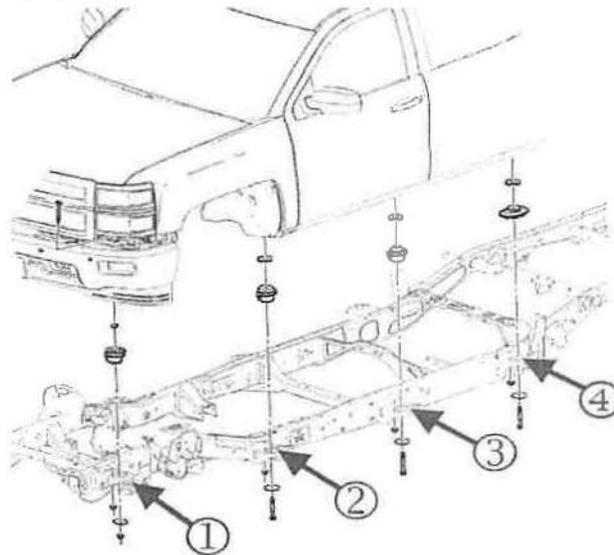
**Warning:** *When settling the body cushions, do NOT separate the frame from the body more than is necessary. Possible personal injury and damage to multiple parts may result if you do not follow the guides outlined below:*

- Intermediate steering shaft – Do not allow the shaft to extend more than 25 mm (1 in).
  - Fuel tank filler hose – Do not stretch the hose excessively.
  - Tail/Turn signal lamp wiring/rear lamps junction block – Leave slack in the wires
  - Park brake cable – Leave slack in the cable
  - Body ground straps – Leave slack in the wire
- ⇒ The technician should first loosen the fastener located at the center of each body mount (6 for a regular cab, 8 for crew and double cab).
- ⇒ Using a large angled pry bar, lift up the cab body slightly to settle / relax it. Perform this at each mount location one at a time.
- ⇒ Repeat this cab mount settling process twice, to confirm the mounts are settled / relaxed.

Visually verify that the cab to box alignment is correct before re-torquing all mounts to specification found in Service Information, body repair, frame and under body section.

**The cab / body mount position location**

The numbers in the picture below indicate the specific mount position. The mounts on the passenger side of the vehicle are identified the same way. This will assist the technician to identify the correct location of each mount so they can be torque to the proper specification.



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- 1 = body mount cushion front
- 2 = body mount cushion position number 1
- 3 = body mount cushion position number 2
- 4 = body mount cushion position number 3

3. Pitchline runout – Pitchline runout will normally show as a 1st order tire vibration on the PicoScope. If after correcting tire(s) with excessive Road Force, a vibration exists, remove differential cover and check ring gear backlash. Every tooth should be checked for excessive backlash. If there is more than 0.0762 mm (0.003 in) of variation, the ring gear and/or differential should be replaced to correct the condition (SI Document ID# 3269088, 3620298) (PIP4148).

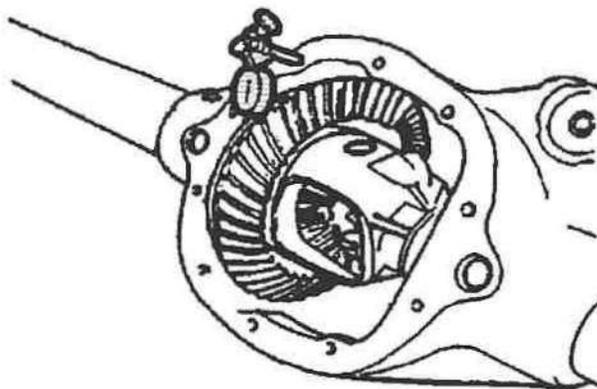
### Backlash Adjustment Procedure

#### Special Tools:

- J-8001 Dial Indicator Set
- J-25025 Guide Pins

#### Note:

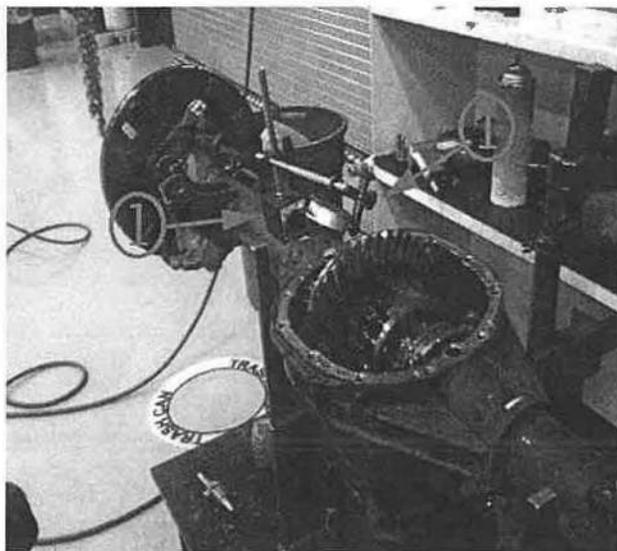
- Ensure that the side bearing surfaces in the axle housing are clean and free of burrs. If the original bearings are to be reused, the original bearing cups must also be used.
  - The differential side bearings must be initially preloaded in order to determine the backlash of the gear set. After the backlash is set, the final bearing preload is set.
  - Mark the bearing caps left or right sides.
1. Measure the rotating torque of the drive pinion and differential assembly. Refer to the Differential Drive Pinion Gear Bearing Replacement in SI.



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2. Install the J-25025 pins and the J-8001 indicator to the axle housing.

**Note:** Preload the dial of the J-8001-3 indicator approximately  $\frac{3}{4}$  of a turn and zero the gauge.



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**Note:** The illustration above is for reference only. The differential does NOT need to be removed from the vehicle.

3. Set the J-8001-3 indicator (1) so that the stem is aligned with the gear rotation (1) and square to the tooth angle.
4. Hold the drive pinion stationary and move the ring gear back and forth.
5. Repeat the measuring procedure at **each tooth** around the ring gear.

6. The difference between the backlash at all of the measuring points should not vary by more than 0.05 mm (0.002 in).
7. If the difference between the backlash at all of the measuring points varies by more than 0.05 mm (0.002 in), inspect for burrs, a distorted case flange or uneven bolting.
8. If the difference between all the measuring points is within specifications, the backlash at the minimum lash point measured should be 0.08-0.25 mm (0.003-0.010 in) with a preferred backlash of 0.13-0.18 mm (0.005-0.007 in).

**Note:**

- Increasing or decreasing the shim thickness by 0.05 mm (0.002 in) will change the backlash adjustment approximately 0.03 mm (0.001 in).
- If the backlash is less than, select a smaller shim than the one that was removed. For example, to INCREASE the backlash by 0.05 mm (0.002 in), select a shim that is 0.10 mm (0.004 in) thinner than the shim that was removed.
- If the backlash is larger than, select a larger shim than the one that was removed. For example, to DECREASE the backlash by 0.05 mm (0.002 in), select a shim that is 0.10 mm (0.004 in) thicker than the shim that was removed.

9. Install the selected shim.

**Caution:** Use the correct fastener in the correct location. Replacement fasteners must be the correct part number for that application. Do not use paints, lubricants, or corrosion inhibitors on fasteners, or fastener joint surfaces, unless specified. These coatings affect fastener torque and joint clamping force and may damage the fastener. Use the correct tightening sequence and specifications when installing fasteners in order to avoid damage to parts and systems. When using fasteners that are threaded directly into plastic, use extreme care not to strip the mating plastic part(s). Use hand tools only, and do not use any kind of impact or power tools. Fastener should be hand tightened, fully seated, and not stripped.

10. If the backlash is too small, increase the backlash using the following procedure:

- 10.1. Remove the bearing cap bolts and the bearing caps.

**Note:** Mark the bearing cups and the shims left or right.

- 10.2. Remove the differential case assembly with the bearing cups and the shims.

Note: Measure the production shim or the shim and service spacer in 3 locations.

Measure each shim separately.

- 10.3. Measure the thickness of left side shim pack.

**Note:** If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), remove 0.10 mm (0.004 in) of thickness from the left side shim pack.

- 10.4. Calculate the average of the 3 measurements for each shim.

**Note:** If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), remove 0.10 mm (0.004 in) of thickness from the left side shim pack.

- 10.5. Assemble a new left side shim pack by decreasing the appropriate amount of thickness from the original left side shim pack.

**Note:** Measure each shim separately.

- 10.6. Measure the thickness of right side shim or the shim and service spacer in 3 locations.

**Note:** Add the average of each of the shim measurements together. Record the measurement. This is the thickness for the right side shim pack.

- 10.7. Calculate the average of the 3 measurements for each shim.

- 10.8. Assemble a new right side shim pack by increasing the appropriate amount of thickness to the original right side shim pack. If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), add 0.10 mm (0.004 in) of thickness to the right side shim pack.

11. Use the following procedure to decrease the backlash if the backlash is too large:

- 11.1. Remove the bearing cap bolts and the bearing caps.

**Note:** Mark the bearing cups and the shims left or right.

- 11.2. Remove the differential case assembly with the bearing cups and the shims.

**Note:** Measure the production shim or the shim and service spacer in 3 locations. Measure each shim separately.

- 11.3. Measure the thickness of left side shim pack.

**Note:** Add the average of each of the shim measurements together. Record the measurement. This is the thickness for the left side shim pack.

- 11.4. Calculate the average of the 3 measurements for each shim.
- 11.5. Assemble a new left side shim pack by increasing the appropriate amount of thickness to the original left side shim pack. If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to increase the backlash by 0.05 mm (0.002 in), add 0.10 mm (0.004 in) of thickness to the left side shim pack.

**Note:** Measure the shim or the shim and service spacer in 3 locations. Measure each shim separately.

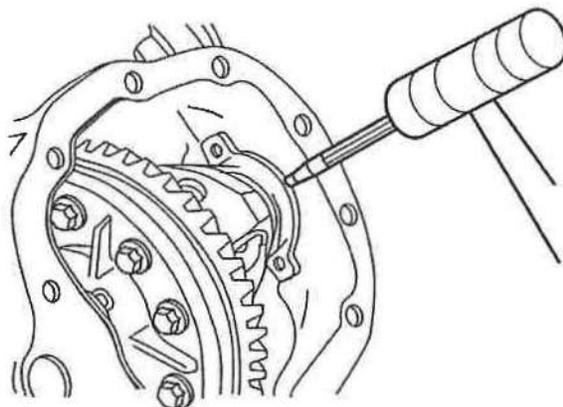
- 11.6. Measure the thickness of right side shim pack.

**Note:** Add the average of each of the shim measurements together. Record the measurement. This is the thickness for the right side shim pack.

- 11.7. Calculate the average of the 3 measurements for each shim.

- 11.8. Assemble a new right side shim pack by decreasing the appropriate amount of thickness to the original right side shim pack. If the original shim is cast iron production shim, assemble the shim pack using a service spacer and service shims. For example, to decrease the backlash by 0.05 mm (0.002 in), remove 0.10 mm (0.004 in) of thickness to the right side shim pack.

12. Install the differential case assembly with the bearing cups.
13. Install the left side service shims between the axle housing and the differential case.
14. Install the right side service shims between the axle housing and the differential case.



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**Note:** The service spacers must be installed between the service shim(s) and the axle housing.

15. Using the brass drift for 9.5/9.76 axle, install the left side service spacer.
16. Recheck the backlash and adjust, if necessary.
17. Install the bearing caps and bolts and tighten to 85 N•m (63 lb ft).
18. Recheck the backlash and adjust, if necessary.
19. Once backlash is correct, perform a gear tooth contact pattern check in order to ensure proper alignment between the ring and pinion gears. Refer to the Gear Tooth Contact Pattern Inspection in SI.

**Note:** Recheck the backlash following the steps above to verify that the backlash is within specifications.

20. Tighten the differential bearing cap bolts to 85 N•m (63 lb ft).
21. Measure the drive pinion and differential case side bearing preload and adjust, if necessary following the steps above.
22. Once the backlash and bearing preload is correct, perform a gear tooth contact pattern check in order to ensure proper alignment between the ring and pinion gears. Refer to the Gear Tooth Contact Pattern Inspection in SI.

**Once all areas of vibrations has been reduced, if there is still vibration that the customer is concerned about, the following diagnosis maybe helpful to determine if a shock issue exists.**

**Warning:** *The following items should NOT be utilized until the source of the problem has been corrected.*

**Potential Vibration/Rough Ride:****Condition/Concern**

The shock issues below DO NOT cause a vibration, it will only make an existing vibration feel worse. In some cases, a vibration that would not normally be a customer concern may now be felt due to a bad shock. But in general, the original source of the vibration, whether it is the wheels, tires, propeller shaft, etc, will have to be corrected. When diagnosing a vibration issue, there have been reports of the shocks amplifying the vibration felt inside the truck. Engineering has found that some shocks may have been built with contaminated shock oil. This may cause the shocks to dampen incorrectly.

**This only applies to the following shocks:**

- Rear- Only trucks listed with the Z71 option (RPO Z71, these shocks will be white in color)

**Recommendation/Instructions:**

Two checks are needed to be performed to verify if the shocks could be an issue:

1. Check the date code located on the bottom of the shock. The first 8 digits are the GM part number. The next 5 digits are the supplier part number. The last 5 digits will be the date code. Any shock built before A1474 could have an issue. The date code format is as follows: 1st digit is the plant, next 3 digits are the day of the year and the last digit is the last number of the year.

**Example:**

- A14743C
- A = Plant
- 147 = 147th Day of the Year
- 4 = 2014
- 3C = Drawing Change Level

2. If the rear shocks are built before this date code, they will have to be removed for a dynamic test.

**Dynamic Test (Rear Shock – Z71 option only)**

Starting with a fully extended shock, compress the rod taking notice of the first 10 millimeters of travel. A good shock will not have any free play and there will be immediate resistance to being compressed. A shock with an issue will have several millimeters of free play (no resistance) before feeling the resistance from being compressed. Replace any shocks with excessive free play. In most cases, the rear shocks will be the issue.

**Warranty Information**

For vehicles repaired under the Bumper-to-Bumper coverage (Canada Base Warranty coverage), use the following labor operation. Reference the Applicable Warranties section of Investigate Vehicle History (IVH) for coverage information.

Labor Operation	Description	Labor Time
3080138*	Perform Pico Scope Vibration Measurement and Road Test	0.5 hr
8080108*	Perform Road Force Measurement	0.9 hr
	Add time to vector each tire correction (Before and after Road force number should be noted on Vibration worksheet)	0.2 hr
3080088*	Perform Prop Shaft Measurement and Balance (two hose clamp method)	0.8 hr
8033641	Front Shock Absorber, Shock Absorber Component, or Spring Replacement - Both Sides	1.2 hrs
8044751	Rear Shock Absorber Replacement - Both Sides	0.7 hr
3080168*	Steering Gear Support Bushing Replacement	3.0 hrs
1431160	Body Mount Upper and Lower Cushion Replacement	1.2 hrs
<b>Note:</b> For steering wheel angle and/or front toe adjustment times, refer to labor code 8070012 and add the applicable base times to base labor hours.		
**	Replace Tire(s)	Use Published Labor Operation Time
*This is a unique Labor Operation for Bulletin use only.		
**Use the appropriate labor operation code in SI specific to the manufacturer of the tire being replaced.		

**Notice: To access the Vibration Diagnostic Worksheet, Go to > Global Connect > Service Forms > General Information > Vibration Diagnostic Worksheet.**

NHTSA  
COMPLAINTS  
EXHIBIT 4

1. A consumer complaint dated 11/05/2014 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: VEHICLE HAS A TERRIBLE VIBRATION. HAS BEEN TO DEALER 7 TIMES, FOR A TOTAL OF 4 WEEKS. A GM ENGINEER HAS LOOKED AT IT TWICE. THEY HAVE REPLACED RING/PINION, DRIVESHAFT, AXLE. TRIED IT WITH 4 SETS OF TIRES/WHEELS. LAST IDEA WAS TO REPLACE SHOCKS, STRUTS, SWAY BARS WITH HAND BUILT PARTS, CUT BRACKETS OFF CAR AND WELD NEW BRACKETS ON. WHEN LIABILITY WAS BROUGHT UP, THEY CHANGED THEIR STORY. THERE IS A LARGER ISSUE AS WAS RELAYED BY ENGINEER TO SERVICE MANAGER AT DEALERSHIP. ISSUE IS WITH ALL 2015 TAHOE, YUKON, ESCALADES. IN AN EFFORT TO PREVENT ROLL OVERS, THEY DESIGNED THE FRAME AND BODY MOUNTS TOO STIFF. THERE ARE 40 ENGINEERS WORKING ON ISSUES, THEY HAVE NO SOLUTIONS THAT WORK ACROSS THE BOARD. ACCORDING TO ENGINEER, GM IS KEEPING AN EYE ON HOW MANY UNITS THEY HAVE TO BUY BACK, OR TRADE FOR ... IF NUMBER IS LOW ENOUGH, THEY WILL NOT MAKE ANY CHANGES TO DESIGN. I WOULD LIKE TO SCHEDULE A MEETING NEXT WEEK TO DISCUSS THIS ISSUE AND THE LARGER ISSUE IN PERSON. SINCE THEY ARE REFUSING TO BUY BACK MY VEHICLE, I AM TURNING MATTER OVER TO ATTORNEY. \*TR.

2. A consumer complaint dated 01/15/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: TL\* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 47 MPH, THE STEERING WHEEL VIBRATED WITHOUT WARNING. THE CONTACT MENTIONED THAT THE FAILURE ONLY OCCURRED WHEN DRIVING LESS THAN 55 MPH. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED THAT THE BEARING, GEAR KIT, GASKET AND SEAL NEEDED TO BE REPLACED AND THE DRIVE SHAFT NEEDED TO BE RE-BALANCED. THE VEHICLE WAS REPAIRED. THE

FAILURE RECURRED. THE VEHICLE WAS TAKEN TO ANOTHER DEALER WHERE IT WAS DIAGNOSED THAT THE RACK AND PINION, BEARING, GEAR KIT, SEAL AND GASKET NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 21,084.

3. A consumer complaint dated 01/15/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: TL\* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 47 MPH, THE STEERING WHEEL VIBRATED WITHOUT WARNING. THE CONTACT MENTIONED THAT THE FAILURE ONLY OCCURRED WHEN DRIVING LESS THAN 55 MPH. THE VEHICLE WAS TAKEN TO A DEALER WHERE IT WAS DIAGNOSED THAT THE BEARING, GEAR KIT, GASKET AND SEAL NEEDED TO BE REPLACED AND THE DRIVE SHAFT NEEDED TO BE RE-BALANCED. THE VEHICLE WAS REPAIRED. THE FAILURE RECURRED. THE VEHICLE WAS TAKEN TO ANOTHER DEALER WHERE IT WAS DIAGNOSED THAT THE RACK AND PINION, BEARING, GEAR KIT, SEAL AND GASKET NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 21,084.

4. A consumer complaint dated 3/1/2015 and submitted to NHTSA states the following regarding a 2015 GMC Sierra: TL\* THE CONTACT OWNS A 2015 GMC SIERRA. WHILE DRIVING APPROXIMATELY 60 MPH, THE VEHICLE BEGAN TO VIBRATE. THE LONGER THE VEHICLE WAS DRIVEN, THE MORE IT SHOOK. THE CONTACT TOOK THE VEHICLE TO THE DEALER SEVERAL TIMES, BUT NO FAILURE WAS FOUND. THE

DEALER TEST DROVE THE VEHICLE AND IT DID NOT VIBRATE. THE DEALER REPLACED THE TIRES, TRANSMISSION, AND SHOCKS; HOWEVER, THE FAILURE RECURRED. THE VEHICLE WAS NOT REPAIRED. THE CONTACT STATED THE SEAT WARMERS ALSO FAILED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURES. THE APPROXIMATE FAILURE MILEAGE WAS 2,500.

5. A consumer complaint dated 03/20/2015 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: TRANSMISIÓN PROBLEMS WE WHERE DRIVING AROUND THE CITY AT 30-40MPH WHEN THE GEARS WENT CRAZY IT ACCELERATED BY ITSELF RPMS WENT CRAZY IT SOUNDED LIKE THE TRANSMISIÓN HAD GEARS IN PAN LOUD GRINDING THEN ALSO THE SEATS DONT VIBRATE WITH LAND DEPARTURE IT SHOWS SERVICE LANE DEPARTURE LAST WHEN DRIVI G AT SPEEDS LF 40-70 MPH THERE IS A STRONG VIBRATION IN FRONT MAKES ENTIRE TRUCK SHAKE TOOK TO DEALER ROTATED TIRES AND BALANCED ALLIGNMENT ALSO AND PROBLEM STILL THERE IDK WHAT TO DO.

6. A consumer complaint dated 3/20/2015 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: PROBLEM STARTED WHEN DRIVING AT 60-70 MPH YOU CAN FEEL A STRONG VIBRATION CAUAES ENTIRE TRUCK TO SHAKE DONT KNOW WHAT IT IS DEALERS CANT FIX ALSO TRANSMISIÓN SHIFTS INTO GEARS HARD ACCELERATES BY ITSELF CAUSES ROUGH DRIVING VERY LOUD NOISE UNDER TRUCK SOUNDS LIKE TRANSMISIÓN ABOUT TO COME OFF AND ALSO SHIFTS INTO 4WD BY ITSELF OR PARK TO NUETRAL AND TRUCK WONT RUN.

7. A consumer complaint dated 05/01/2015 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: OUR VEHICLE HAS A SIGNIFICANT VIBRATION IN V4 MODE WHEN TRAVELING BETWEEN 45-65 MPH AND ABOVE. THE VIBRATION IS ALSO ACCOMPANIED BY INCREASED CABIN PRESSURE. THESE ISSUES ARE CAUSING HEADACHES, NAUSEA, DIZZINESS, AND ARE FURTHER EXACERBATING MY WIFE'S MULTIPLE SCLEROSIS. WE ALSO HAVE A POPPING SOUND COMING FROM THE REAR OF THE VEHICLE'S SUSPENSION WHEN TURNING THAT MAKES US FEEL UNSAFE. THE VIBRATION STARTED RIGHT AFTER WE TOOK DELIVERY OF THE CAR AND HAS ONLY GOTTEN WORSE. WE BOUGHT THE CAR IN APRIL 2015 AND THE ISSUE CONTINUES UNFIXED TO THIS DAY. THE POPPING NOISE STARTED ABOUT 3-4 WEEKS AGO AND IT SOUNDS LIKE A SUSPENSION COMPONENT. OUR AC RECIRCULATING FEATURE ALSO DOES NOT WORK AND IT ALLOWS HARMFUL EXHAUST SMOKE IN.

8. A consumer complaint dated 06/08/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Silverado: TL\* THE CONTACT OWNS A 2015 CHEVROLET SILVERADO. THE CONTACT STATED THAT WHILE DRIVING AT 60 MPH, THE INTERIOR OF THE VEHICLE VIBRATED. THE VEHICLE WAS TAKEN TO A DEALER MULTIPLE TIMES. THE TECHNICIAN WAS UNABLE TO DIAGNOSE OR REPAIR THE VEHICLE. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 200.

9. A consumer complaint dated 07/05/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Silverado: THE TRUCKS HAVE A VIBRATION THAT IS FELT IN THE STEERING WHEEL, FLOOR, SEATS, ACCELERATOR AND BRAKE

PEDALS ETC. WHILE DRIVING. THE MAJOR CONSENSUS IS THAT THE WORST SPEED IS 76 MPH, YET IT IS FELT TO A LESSER DEGREE AT ANY SPEEDS, WITH SOME BEING WORSE THAN OTHERS. THERE ARE A LARGE NUMBER OF TRUCKS WITH THIS ISSUE, YET GENERAL MOTORS REFUSES TO DO ANYTHING ABOUT IT. IT BEGAN WITHIN A COUPLE WEEKS OF PURCHASING MY TRUCK. I FOUND PEOPLE FIRST REPORTING THE ISSUE IN 2015, AND MORE RECENTLY IT CONTINUES WITH THE 2015 AND 2016 MODEL YEARS.

10. A consumer complaint dated 07/16/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Silverado: BOUGHT THE TRUCK NOTICED THERE IS A SHAKE WHEN DRIVING FROM 60-80 TOOK IT BACK SAME DAY I BOUGHT IT AND THEY SAID OH WE KNOW WHAT IT IS IT'S THE TIRES SO THEY REPLACED THEM NOPE DIDN'T FIX IT SO TOOK IT BACK THEY REPLACED TWO MORE TIRES IN THE FRONT SAYING THE NEW ONES HAD A BALLS ON THEM SO TOOK IT HOME AND NOPE DIDN'T FIX IT SO TOOK IT BACK AGAIN AND THEY DRIVE IT AND SAY IT'S THE DRIVE SHAFT SO THEY FIX IT I TAKE IT HOME. IT'S STILL NOT FIXED. IT MAKES FOR A VERY UNCOMFORTABLE DRIVE. WE BOUGHT A 46,000 TRUCK AND THERE'S PROBLEMS WITH IT. REALLY SCARED SOMETHING WRONG IS WITH IT AND THE DEALER DUO IS NOT HELPING. IF YOU GO PAST 80 THE TRUCK WHISTLES LIKE A SIREN. PLEASE HELP ME I TRAVEL A LOT AND HAVE KIDS IN.

11. A consumer complaint dated 08/01/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Silverado: HAS A VIBRATION AT 65, TURNS INTO A BAD SHAKE AT 75.

12. A consumer complaint dated 08/08/2015 and submitted to NHTSA states the following regarding a 2015 GMC Sierra: TL\* THE CONTACT OWNS A 2015 GMC SIERRA 2500. THE CONTACT STATED THAT WHILE DRIVING AT HIGH SPEEDS, THE VEHICLE VIBRATED VIOLENTLY WITHOUT WARNING. THE VEHICLE WAS TAKEN TO A DEALER BUT THE FAILURE WAS UNABLE TO BE DUPLICATED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 30.

13. A consumer complaint dated 08/28/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: BAD VIBRATION AT SPEEDS BETWEEN 60 TO 75 MPH (GM DEALER HAS HAD CAR 3 TIMES AND REPLACED TIRES, ROAD FORCED BALANCED, CHECKED ALIGNMENT WITH NO SUCCESS); WIND NOISE AND BUFFETING INSIDE CAR WITH ALL WINDOWS IN THE UP POSITION AT SPEEDS FROM 35 MPH AND UP CAUSING DIZZINESS AND NAUSEA ON LONGER RIDES. EXTERIOR DOOR PLASTIC FASCIA BECOMES LOOSE AND FALLS OFF DUE TO METAL CLIP BREAKING OFF AT THE ATTACHMENT POINT.

14. A consumer complaint dated 09/01/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: CAR WAS VIBRATING WHEN GETTING ABOVE 45 MILES PER HOUR. THOUGHT WHEELS NEEDED TO BE BALANCED. ONCE BALANCED, PULLED TRAILER AND VIBRATION WAS EXTREMELY WORSE. VIBRATING LIKE WE HAD THE BACK WINDOW ROLLED DOWN, BUT ALL WINDOWS WERE UP. WENT BACK TO DEALER IN NEWNAN GEORGIA AND THEY HOOKED UP A TRAILER TO ANOTHER VEHICLE AND IT HAD THE SAME PROBLEM. WE WERE TOLD THEY COULD NOT DO ANYTHING ABOUT IT. WE THEN BOUGHT NEW TIRES THINKING IT WOULD HELP THE ISSUE. WE HAVE SINCE BOUGHT TWO SETS OF

TIRES, CONSTANTLY HAVING THE VEHICLE TIRES ROTATED AND BALANCED TRYING TO MINIMIZE THE VIBRATION. WE ARE CURRENTLY UP TO 53K ON THE VEHICLE AND VERY DISAPPOINTED IN THE VEHICLE WITH THE LUXURY PRICE WE PAID. THIS ALL HAPPENED UPON PURCHASE.

15. A consumer complaint dated 09/15/2015 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: I LEASED A 2016 YUKON DENALI XL ON 9/15/15. IT HAS TWO MAJOR PROBLEMS. 1. BUFFETING/PRESSURE NOISE - A NOISE AS IF A WINDOW IS CRACKED, EXCEPT IT'S NOT CRACKED. THIS OCCURS AT SPEEDS FROM 24MPH AND UP AND CAUSES EARS TO POP AND IS NOTICEABLE TO VIRTUALLY EVERY PASSENGER I HAVE HAD. 2. WHOLE-TRUCK VIBRATION - OCCURS BETWEEN 70-80MPH IN ENTIRE VEHICLE. WHEEL REPLACEMENTS, TIRE REPLACEMENTS, ROAD-FORCE BALANCING, DRIVESHAFT REPLACEMENT, DRIVESHAFT "BALANCING", ETC. NOTHING HAS FIXED IT. I HAVE DRIVEN 13 2016 YUKON, YUKON XL, TAHOE AND SUBURBANS. EVERY SINGLE ONE HAS THE BUFFETING ISSUES. ALL BUT ONE HAS THE VIBRATION ISSUES. GM HAS ISSUED A PI STATING THAT THE ROOF BOWS MAY HAVE COME DISCONNECTED AND THEY NEED TO BE REATTACHED. THE ISSUE HERE IS THAT REATTACHING THEM DOESN'T FIX THE BUFFETING ISSUE. I HAVE A DATE-STAMPED LOG OF EVERY DEALER VISIT, CONVERSATION, EMAIL, ETC. AND AM GLAD TO SHARE IT. THESE ISSUES ARE RIDICULOUS TO OCCUR IN ANY CAR MUCH LESS A 75K FLAGSHIP CAR THAT PULLS IN 3-7K IN PROFIT FOR GM/DEALERS PER VEHICLE.

16. A consumer complaint dated 10/01/2015 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: VEHICLE HAS A VIBRATION

WHEN GOING BETWEEN 60-70 MILES PER HOUR ON HIGHWAY. THE VIBRATION STARTS AND STOPS OVER AND OVER AGAIN. VIBRATION LAST ABOUT TWO SECONDS EACH TIME. TOOK VEHICLE TO DEALER THEY SAID THE ISSUE WAS CAUSED BY RECALL THAT GMC WAS TRYING TO FIX. CURRENTLY NO PART IS AVAILABLE TO FIX VEHICLE. INSTRUCTED TO JUST KEEP DRIVING VEHICLE WITH THE VIBRATION UNTIL A PART IS ISSUED.

17. A consumer complaint dated 10/15/2015 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: I PURCHASED A NEW, 2015 GMC YUKON XL IN DECEMBER OF 2014. I HAD BEEN DEALING WITH A VIBRATION RELATED PROBLEM AT HIGHWAY SPEEDS STARTING IN OCTOBER OF 2015 IN MY SUV THAT THE DEALER BALANCED, ALIGNED, ETC. PROBLEM STILL EXISTED IN DECEMBER OF 2015, AGAIN RAN TESTS AND FOUND NOTHING. CONTINUED TO COMPLAIN EVERY TIME I WENT INTO DEALER AND ON JUNE 28, 2016 AND WAS TOLD MY TREAD WAS WEARING UNEVENLY, AND AFTER A ROAD TEST WITH THE HEAD TECHNICIAN IT WAS FOUND THERE WAS HIGH ROAD FORCE ON THE TIRES. TODAY I CAME IN FOR MY OIL CHANGE AND MY DEALER HAD AN ALERT TO CHECK MY TIRES (ORIGINAL ONES THAT I REPLACED AT MY COST ON 6/28/16) FOR THE EXACT TIRE ON MY TRUCK GIVING ME THE SAME PROBLEM. I HAVE A HIGH SPEED VIBRATION AND TREAD WEAR PROBLEMS. MY OLD TIRES WERE OUTSIDE OF THE RECALL BUT I FEEL THAT THEY WERE DEFECTIVE. MY DOT# WAS A32AWBDE2414 AND I HAD TO REPLACE ALL 4 TIRES. GM PAID PARTIAL WARRANTY ON THEM. MY COST WAS \$519.45. \*TR.

18. A consumer complaint dated 10/31/2015 and submitted to NHTSA states the following regarding a 2015 GMC Sierra: STEERING WHEEL AND TRUCK VIBRATES/SHAKES AND VARIOUS SPEEDS.

19. A consumer complaint dated 11/25/2015 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: VIBRATION AT SPEEDS OVER 72 MPH BECOMES WORSE WHILE GOING UP GRADE WHILE ACCELERATING...HAS BEEN IN SHOP MANY TIMES NEW TIRES, BALANCED MULTIPLE TIMES, ALONG WITH SUSPENSION PARTS AND DRIVE TRAIN PARTS. STILL NOT FIXED SUV HAS 22 INCH RIMS.

20. A consumer complaint dated 12/21/2015 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: CABIN VIBRATION AT HIGHWAY SPEEDS. AFTER SEVERAL ATTEMPTS DEALER SAID THERE IS NO FIX AND IS NOT LOOKING TO CORRECT ISSUE.

21. A consumer complaint dated 12/24/2015 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: SINCE THE DAY I PURCHASED THIS 2016 GMC YUKON XL DENALI THERE HAS BEEN A VIBRATION IN WHAT I THINK IS THE PASSENGER REAR END. I'VE TAKEN IT IN 3 TIMES AND EACH TIME THE DEALER AND THE GM REPRESENTATIVE SAY IT IS "WITHIN SPEC." THIS PROBLEM HAS PERSISTED. THE VEHICLE IS NOW ALMOST UN-DRIVABLE DUE TO THE SHAKING. IT AFFECTS THE STEERING WHEEL AT ALL SPEEDS. THIS HAPPENS AT ALL SPEEDS ON ALL TERRAINS. THIS HAPPENS WHEN THE VEHICLE IS COLD AS WELL AS WARM/HOT. THE VEHICLE WILL SOMETIMES JERK TO THE LEFT OR RIGHT WHEN THE SHAKING GETS REAL BAD. THIS VEHICLE IS BECOMING

DANGEROUS TO DRIVE BUT I HAVE TO USE IT. I AM NOT THE ONLY ONE WITH THIS ISSUE AND WOULD APPRECIATE SOME HELP.

22. A consumer complaint dated 01/01/2016 and submitted to NHTSA states the following regarding a 2016 GMC Sierra: VEHICLE SHAKES AND VIBRATES AT ANY SPEEDS ABOVE 75 MPH.

23. A consumer complaint dated 01/06/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: VIBRATION AT SPEEDS OF 70-80 MPH. THE TIRES HAVE BEEN ROAD FORCED BALANCED 3 TIMES STILL HAS THE PROBLEM. THE PROBLEM WAS NOTICED AFTER THE FIRST SERVICE AND TIRES ROTATED.

24. A consumer complaint dated 01/28/2016 and submitted to NHTSA states the following regarding a 2016 Cadillac Escalade: CAR VIBRATES FROM 35MPH UP TO 80 PLUS. HAD IT TO DEALER 5 TIMES AND THEY KNOW THAT THERE IS A VIBRATION. THEY SAID GM SAID THE TORQUE CONVERTER WAS OUT OF BALANCE AND GM WAS DESIGNING A FIX. ABOUT 5 CALLS AND THREE WEEK LATER THEY RECEIVED A NEW SPECIAL TORQUE CONVERTER AND AFTER IT WAS INSTALLED THE VIBRATION WAS STILL THERE. YOU CAN FEEL THE VIBRATION IN THE STEERING WHEEL, THROTTLE, CENTER CONSOLE, FLOOR, AND THE SEAT. THE SERVICE MANAGER HAS BEEN VERY POLITE AND HAS GONE OUT OF HIS WAY TO HELP. A GM FIELD SERVICE REP HAS LOOKED AT THE CAR AND SAID IT IS WITHIN GM SPECS. I AM READING ALL OVER THE INTERNET OF THE SAME PROBLEM AND GM HAS REPLACED DRIVELINES, WHEELS, TIRES, TORQUE CONVERTERS, SHOCKS, REAR AXLES, ENGINE MOUNTS, ETC. AND STILL HAVE A VIBRATION PROBLEM.

THEY HAVE EVEN BOUGHT SOME OF THE 2015 AND 2016 BACK. THIS IS HAPPENING ON ALL GM FULL SIZE SUV'S. CHEVROLET, GMC, AND CADILLAC.

25. A consumer complaint dated 02/02/2016 and submitted to NHTSA states the following regarding a 2016 Cadillac Escalade: TL\* THE CONTACT OWNS A 2016 CADILLAC ESCALADE. THE CONTACT STATED THAT WHILE DRIVING AT 35 MPH, THE VEHICLE BEGAN TO VIBRATE AS THE SPEED INCREASED. THE VEHICLE WAS TAKEN TO BE REPAIRED BUT THE DEALER COULD NOT REMEDY THE FAILURE. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 4,000. UPDATED 05/11/16\*LJ.

26. A consumer complaint dated 02/10/2016 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: HAS THE CHEVY SHAKES BETWEEN 38 AND 70 MILE PER HOUR .5.3 V8 MOTOR AND 8 SPEED TRANSMISSION 342 REAR AXEL LOCKING DIFFERENTIAL . BEEN SELLING GM'S FOR 55 YEARS AND IF THIS WAS A DEMENSTRATOR WE WOULD NEVER NEVER SELL ANOTHER TRUCK.

27. A consumer complaint dated 03/04/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: VEHICLE HAS UNUSUAL VIBRATION AT HIGHWAY SPEEDS. IT HAS DONE THIS FOR SOME TIME & DOES THIS OVER MOST ROAD TYPES - WE RECENTLY TOOK IT TO FLORIDA ON A 2,000+ MILE VACATION TRIP - IT VIBRATED MOST OF THE TIME ON THE HIGHWAY.

28. A consumer complaint dated 03/05/2016 and submitted to NHTSA states the following regarding a 2015 GMC Sierra: MY VEHICLE SHAKES AT HIGHWAY SPEED. I CAN FEEL IT IN THE STEERING WHEEL, AND SEAT. VISUALLY I CAN SEE THE BED OF THE TRUCK SHAKE. THE ISSUE HAS NOT GONE AWAY.

29. A consumer complaint dated 03/16/2016 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: MY 2016 YUKON DENALI HAS A VIBRATION PROBLEM, WHICH I BELIEVE IS CAUSED BY THE MAGNETIC RIDE CONTROL. THE VIBRATION DOES NOT SPEED UP, NOR SLOW DOWN, DEPENDING ON SPEED. IT IS, HOWEVER, MORE NOTICEABLE WHEN THERE IS ANY ROAD IMPERFECTION. THE GMC SERVICE DEPT. HAS BALANCED AND ROTATED TIRES, EVEN SENT IT TO TWO OTHER BUSINESSES TO TRY AND FIX -- ALIGNMENT, ETC. VIBRATION CONTINUES. I'VE HAD PASSENGERS WHO ASK ""WHY DOES YOUR CAR HAVE THE SHIVERS?"" GM DEALER DID GET AHOLD OF A GMC TECHNICIAN WHO FLEW IN, AND DROVE THE CAR AND SAID -- YES IT HAS A VIBRATION, BUT IT IS IN ACCEPTABLE PARAMETERS. MY DEALER HAS PROVIDED ME 3 DIFFERENT RENTAL CARS WHILE WORKING TO TRY AND FIX THE ""SHIVERS"" ... ALL THREE WERE FAIRLY NEW, SMALL BUICKS, AND ALL 3 RODE BETTER THAN THIS NEW \$75,000 DENALI. I LOVE THE VEHICLE, HATE THE VIBRATION. GMC ITSELF HAS NOW TOLD ME -- YOUR CASE IS CLOSED! THE VIBRATION IS WITHIN ACCEPTABLE LIMITS. THE DEALER HAS LET ME DRIVE TWO OTHER YUKON DENALI'S ... BOTH HAVE SIMILAR VIBRATIONS... JUST NOT AS BAD AS THIS VEHICLE. VIBRATION IS NOTICEABLE AT 25 MPH, AS WELL AS AT 80 MPH; ALTHOUGH IT IS MORE NOTICEABLE ON ROUGHER ROADS. AM HAPPY TO SHARE THE REPORTS FROM MY LOCAL GM DEALER, WHO COMPLETELY AGREES THAT THE CAR SHIMMIES. WE TRIED THE GMC BUYBACK PROGRAM, AND I WAS TOLD BY GMC THAT PROGRAM IS NOT AVAILABLE TO ME, EVEN THOUGH I TOOK THE CAR BACK TO THE DEALER WHEN I HAD LESS THAN 100 MILES ON IT. AND HAVE BEEN TAKING IT BACK REGULARLY SINCE.

30. A consumer complaint dated 04/02/2016 and submitted to NHTSA states the following regarding a 2015 GMC Sierra: WHEN AT SPEEDS OF ROUGHLY 50MPH SEATS VIBRATE. TRUCK HAS ROUGHLY 3000MILES AND THE FRAME, REAREND AND OTHER UNDERBODY COMPONENTS HAVE ALOT OF SURFACE RUST.

31. A consumer complaint dated 05/02/2016 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: VIBRATES WHEN AT SPEED 70-85.

32. A consumer complaint dated 05/04/2016 and submitted to NHTSA states the following regarding a 2016 Chevrolet Suburban: I OWN A 2016 CHEVY SUBURBAN LTZ PURCHASED FEB 29, 2016. IT IS NOW AT THE DEALER AND FOR A SECOND TIME DEALING WITH A VIBRATION ISSUE STARTING AT APPROXIMATELY 43 MPH AND CONTINUING TO WORSEN AS SPEED INCREASES. THE TIRES HAVE BEEN ROAD FORCED BALANCE BUT VIBRATION IS STILL PRESENT. THIS IS THE SECOND SUBURBAN WITH ISSUES, THE 2015 I HAD WAS SO PROBLEMATIC THAT GM DID TRADE ASSISTANCE TO GET ME OUT OF IT, BUT IT STILL COST ME MONEY. THE CURRENT 2016 SUBURBAN AS ONLY 1600 MILES ON IT AND VIBRATION ISSUES BEGAN AT APPROXIMATELY 900 MILES. I CANNOT DESCRIBE THE INCONVENIENCE AND FRUSTRATION I AM EXPERIENCING FOR A VEHICLE COSTING MORE THAN \$70,000. GM KNOWS THERE IS A PROBLEM AND THEIR LACK OF FIXING IT OR ADDRESSING IT IS NOTHING SHORT OF CRIMINAL THEFT. THEY TAKE PEOPLE'S MONEY KNOWING THEIR VEHICLES ARE SUB-STANDARD THEN RELEGATE ME TO A PATHETIC LOANER VEHICLE, TELL ME IT IS "NORMAL" AND IN THE END TOSS A LITTLE MONEY FOR "TRADE ASSISTANCE" RESULTING IN

ANOTHER PROBLEMATIC ISSUE. I BEG AND IMPLORE YOU AS THE FEDERAL REGULATORY AGENCY TO MAKE GM ACCOUNTABLE IMMEDIATELY. EITHER FORCE THEM TO IMMEDIATELY FIX THESE VEHICLES, FORCE THEM TO BUY THEM BACK AT FULL PURCHASE PRICES AND STOP THEM FROM SELLING THEM IMMEDIATELY. FRANKLY, THIS ISSUE IS THE SAME AS VW WITH TDI ENGINES EXCEPT THAT GM IS NOT COVERING IT UP AND FEDS ARE NOT FORCING THE HAND. HELP PROTECT THE MONEY AND LIVES OF US CITIZENS. THERE HAVE BEEN NUMEROUS COMPLAINTS!

33. A consumer complaint dated 05/06/2016 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: TL\* THE CONTACT OWNS A 2016 GMC YUKON XL. WHILE DRIVING AT VARIOUS SPEEDS, THE VEHICLE VIOLENTLY VIBRATED WITHOUT WARNING. THE VEHICLE WAS TAKEN TO A DEALER WHERE THE TECHNICIAN REPLACED THE WHEELS, BUT THE FAILURE RECURRED. THE VEHICLE WAS TAKEN BACK TO THE DEALER. THE CONTACT WAS INFORMED THAT THE VEHICLE WAS OPERATING AS DESIGNED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 2,000.

34. A consumer complaint dated 05/06/2016 and submitted to NHTSA states the following regarding a 2016 Cadillac Escalade: VEHICLE EXHIBITS A CONSTANT VIBRATION AT SPEEDS BETWEEN 35 MPH AND 75 MPH. VIBRATION IS NOT ROAD RELATED, IT IS A CONSTANT, STEADY VIBRATION REGARDLESS OF ROAD CONDITIONS, BEST DESCRIBED AS IF THE VEHICLE WAS DRIVING OVER CORDUROY. THERE IS ALSO A STEADY ""BUFFETING"" NOISE COMING FROM THE CABIN OF THE VEHICLE AT SPEEDS BETWEEN 55 MPH AND 70MPH. VEHICLE WAS

BROUGHT TO INDEPENDENT TIRE SHOP (BY ME) TO HAVE WHEELS AND TIRES ROAD FORCE BALANCED. REPORT WAS PROVIDED, ALL IN SPEC AND VIBRATION IS STILL PRESENT. CURRENTLY, THERE IS A ""OPEN TICKET"" ON THE VEHICLE AT THE CADILLAC DEALERSHIP AWAITING A ""GM ENGINEER"" TO VERIFY THE VIBRATION. AS A RESULT, I DO NOT HAVE A COPY OF THE LATEST INVOICE VERIFYING THE SERVICE VISIT. THE VEHICLE CURRENTLY HAS 2000 MILES ON IT, THE VIBRATIONS WERE PRESENT SINE NEW AND SEEM TO BE GETTING WORSE.

35. A consumer complaint dated 06/12/2016 and submitted to NHTSA states the following regarding a 2016 Chevrolet Suburban: I OWN A2016 SUBURBAN AND ITS SEEM TO HAVE A VIBRATION WHEN I'M DOING 35 TO 45 MILES ,TOOK SUBURBAN TO DEALER AND THEY TOLD ME THAT NEED IT BALANCE ON TIRES, I PAY 19.99 FOR THE BALANCE AND THE PROBLEM STILL THERE.ITS THERE ANYTHING I NEED TO DO TO GET THIS PROBLEM SOLVE.

36. A consumer complaint dated 07/19/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: EXCESSIVE VIBRATION WHEN TRAVELING AT HIGHWAY SPEEDS BETWEEN 60-70 MPH. VEHICLE HAS BEEN TO DEALERSHIP 3 TIME FOR THIS PROBLEM AND THEY STATE EVERYTHING IS NORMAL. REBALANCED TIRES AND CHECKED THE SUSPENSION BUT IT CANNOT BE FIXED. MANUFACTUIRNG DEFECT.

37. A consumer complaint dated 08/01/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: TL\* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN EQUIPPED WITH CONTINENTAL CROSSCONTACT LX20 TIRES, SIZE: P275/55R20. WHILE DRIVING APPROXIMATELY 50 MPH, A LOUD NOISE

AND HEAVY VIBRATION OCCURRED UNDERNEATH THE VEHICLE. THE CONTACT TOOK THE VEHICLE TO THE DEALER WHERE IT WAS DIAGNOSED THAT ALL FOUR TIRES HAD EXCESSIVE WEAR. THE TIRES WERE ROTATED SEVERAL TIMES, BUT THE FAILURE RECURRED. THE CONTACT TOOK THE VEHICLE BACK TO THE DEALER WHERE IT WAS DETERMINED THAT THE TIRES MAY HAVE TO BE REPLACED. THE TIRES WERE NOT REPLACED. THE TIRES WERE THE ORIGINAL TIRES. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE DOT NUMBER WAS NOT PROVIDED. THE APPROXIMATE TIRE AND VEHICLE FAILURE MILEAGE WAS 30,000. \*TR.

38. A consumer complaint dated 08/01/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: MY TAHOE JUST STARTED TO HAVE A VIBRATION ISSUES AT SPEEDS FOR 60 TO 75MPH THE WHOLE CABIN SHAKES AND ALSO A WIND NOISE COMING FROM THE ROOF AT SPEEDS AT 80 MPH OR HIGHER MY MILEAGE IS 21000 I GET HEADACHES WHEN DRIVING MY CHEVY TAHOE. \*TR.

39. A consumer complaint dated 08/01/2016 and submitted to NHTSA states the following regarding a 2016 Chevrolet Tahoe: MY BRAND NEW 2016 CHEVY TAHOE SHAKES WHILE AT IDLE IN "DRIVE". THIS ISSUE HAS BEEN TAKEN UP WITH THE DEALERSHIP WHO ACKNOWLEDGES THE ROUGH IDLE BUT SAYS "IT'S WITHIN ACCEPTABLE LIMITS". IT IS NOT ACCEPTABLE TO FEEL LIKE YOU HAVE GERBALS RUNNING UNDER YOUR SEAT WHILE STOPPED AT A RED LIGHT. IT IS CONSTANT AND EXTREMELY ANNOYING. IF THEY ARE GOING TO MAKE A CAR THAT SHAKES, NOT TELL THE CUSTOMER ABOUT THE PROBLEM AND THEN CHARGE OVER \$50,000 FOR THE VEHICLE, SHAME ON THEM. THIS WILL BE THE LAST GM VEHICLE THAT

I PURCHASE. I WILL ALSO GLADLY DISCOURAGE ANYONE LOOKING FOR AN SUV TO PURCHASE A GM VEHICLE.

40. A consumer complaint dated 08/30/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: I HAVE TAKEN MY 2015 CHEVROLET TAHOE IN SEVERAL TIMES FOR A VIBRATION ISSUE. FIRST TIME IT WAS MENTIONED ON AN INVOICE WAS AUGUST OF 2016 BUT HAD BEEN GOING ON FOR MONTHS BEFORE. MY VEHICLE VIBRATES AT ABOUT ANY SPEED. THE FIRST TIME TO THE DEALER THEY SAID THEY DIDN'T THINK THERE WAS A PROBLEM. THE SECOND TIME THEY SAID THAT IT IS THE SUSPENSION BUT THERE IS NOTHING THEY CAN DO ABOUT IT. THE VIBRATION HAS MADE PARTS OF THE VEHICLE TO RATTLE. THE THIRD TIME TO THE DEALER THEY HAD TO FIX A LIGHT ISSUE AND A RATTLE BETWEEN THE PASSENGER FRONT DOOR AND BACK DOOR. THE VIBRATION HAPPENS EVERY WHERE AT EVERY SPEED. SCARIEST ON THE HIGHWAY THOUGH. FEELS LIKE THE VEHICLE IS GOING TO "CRACK" IN HALF. SCARY.

41. A consumer complaint dated 09/07/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: HAVE HAD OUR VEHICLE IN THE DEALERSHIP 3 TIMES FOR ROAD/TIRE VIBRATION FROM TIRES OR SUSPENSION. DEALERSHIP HAS CHANGED 3 OF 4 TIRES COULD NOT GET ROAD FORCED BALANCES WITH 22 INCH TIRES. DEALERSHIP CLAIMS BAD BATCH OF TIRES FROM BRIDGESTONE. VIBRATION HAS CONTINUED AT SPEEDS OF 70-80 MPH. IT ALL BEGAN AFTER THE FIRST SERVICE AT 5792 MILE AND TIRE ROTATION. VEHICLE WAS BROUGHT BACK TO DEALERSHIP ADVISING OF VIBRATION IN STEERING WHEEL AND BOTH FRONT SEATS. DEALERSHIP CLAIMED THAT THEY WERE NOT

ABLE TO GET TIRES BALANCED. HAD TO ORDER 3 DIFFERENT SETS OF REPLACEMENT TIRES WITH NO PREVAIL. BROUGHT BACK AGAIN FOR SECOND REQUIRED SERVICE AND DEALERSHIP HAS ROTATED THE TIRES FOR A SECOND TIME.

42. A consumer complaint dated 10/01/2016 and submitted to NHTSA states the following regarding a 2016 Cadillac Escalade: I PURCHASED A NEW VEHICLE A LITTLE OVER A YEAR AGO, PICKED IT UP AT 4PM, ON MY DRIVE HOME I NOTICED A VIBRATION WHEN DRIVING AT SPEEDS FROM 35 MILES PER HOUR PLUS. THE VIBRATION INCREASES WITH SPEED. I BROUGHT IT BACK TO THE DEALER THE NEXT MORNING ON SATURDAY AT 8AM. I WAS ASKED TO DROP IT OFF DURING THE WEEK, WHICH I DID. THEY REPLACED 4 TIRES. THIS DID NOT CORRECT THE PROBLEM. I BROUGHT IT BACK AGAIN A FEW WEEKS LATER, TWO TIRES WERE REPLACED A SECOND TIME. I STILL HAD THE SAME PROBLEM. I BROUGHT IT BACK AGAIN, THE 3RD TIME THEY REPLACED ON TIRE. IT DID NOT CORRECT THE VIBRATION. I NOW HAVE MY VEHICLE IN FOR SERVICE AGAIN, THEY REPLACED THE DRIVE SHAFT. I JUST RECEIVED AN EMAIL FROM THE SERVICE MANAGER INFORMING ME THE DRIVE SHAFT REPLACEMENT DID NOT CORRECT THE PROBLEM.

43. A consumer complaint dated 11/07/2016 and submitted to NHTSA states the following regarding a 2015 Chevrolet Tahoe: I PURCHASED MY VEHICLE USED ON OCT 14 2016. I DROVE IT FOR ABOUT 3 WEEKS IN LOCAL TRAFFIC WITH SPEEDS 60MPH AND BELOW WITH NO ISSUES. I THEN WENT ON A ROAD TRIP ON NOV 7 2016 WHERE I USED MAJOR INTERSTATES THAT REQUIRED SPEEDS BETWEEN 70-75

MPH. AS SOON AS I HIT THE MAJOR INTERSTATES I NOTICED SOMETHING WAS NOT RIGHT. WHEN THE VEHICLE WAS SET TO CRUISE BETWEEN 70-75MPH AND THE VEHICLE REDUCED FROM V8 MODE TO V4 MODE THE INTERIOR OF THE VEHICLE BEGAN TO VIGOROUSLY SHAKE. THE HANDLING AND WHEEL TO PAVEMENT CONTACT FELT STABLE SO I CONTINUED MY 600 MILE TRIP. AT TIMES THE SHAKING CONDITIONS MADE ME FEEL DIZZY AND SOMEWHAT NAUSEOUS. I IMMEDIATELY UPON ARRIVAL AT MY DESTINATION SCHEDULED AN APPOINTMENT AT A CERTIFIED CHEVY DEALER AND WAS SEEN NOV 14 2016. THEY TEST DROVE THE VEHICLE FOR ABOUT 22 MILES AND WERE ABLE TO DUPLICATE MY PROBLEM, HOWEVER THROUGH TROUBLESHOOTING AND INSPECTION COULD NOT FIND ANYTHING WRONG. I CALLED THE NUMBER IN THE WARRANTY MANUAL AND STARTED A CLAIM AND THEIR RESOLUTION WAS THE VEHICLE WAS OPERATING AS DESIGNED, BUT THE GM ADVISOR DID SAY THERE WAS A KNOWN ISSUE? HOWEVER THEY COULD NOT TELL ME WHY THE DESIGN MADE THE VEHICLE DO THIS. TO ME IT SOUNDS LIKE IT IS A FLAW IN THE DESIGN AND GM DOES NOT KNOW WHY YET. THROUGH FURTHER RESEARCH I FOUND MULTIPLE POST AND DISCUSSIONS WITH THE SAME COMPLAINT AS WELL AS A FOX NEWS REPORT WHERE GM SPOKESMAN TOM WILKINSON STATED GM KNOWS THERE IS A PROBLEM AND GM WOULD WORK WITH CUSTOMERS CASE BY CASE TO RESOLVE THE PROBLEM. IN MY CASE THE RESOLUTION WAS TO TELL ME THAT'S WHAT IT WAS DESIGNED TO SHAKE. I CERTAINLY DONT BELIEVE WHAT THEY ARE TELLING ME. AFTER SERVING THIS COUNTRY IN TWO DIFFERENT COMBAT ZONES TO PROTECT OUR FREEDOMS IT'S DISAPPOINTING TO KNOW

THAT GM WONT STAND BEHIND THEIR PRODUCT AS I HAVE STOOD AT THE FRONT FOR THIS COUNTRY.L CAN PROVIDE VIDEO AND DEALER SERVICE DOCUMENTS UPON REQUEST.

44. A consumer complaint dated 11/11/2016 and submitted to NHTSA states the following regarding a 2016 Chevrolet Tahoe: VEHICLE SHAKES AND VIBRATES AT SPEEDS ABOVE70MPH. AT SPEEDS OF 80MPH THE SHAKE IS VERY PRONOUNCED AND THE VEHICLE STABILITY IS AFFECTED. VEHICLE HAS BEEN DOING THIS SINCE DAY ONE. DEALERSHIP HAS TRIED REPLACING TIRES MULTIPLE TIMES BUT NOTHING HAS WORKED. DIFFICULT AND DANGEROUS TO DRIVE THE VEHICLE BETWEEN 70-80 MPH.

45. A consumer complaint dated 12/05/2016 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: I AM REQUESTING THAT DOT NHTSA INVESTIGATE THE EXTREME WOBBLE/VIBRATION/SHAKE ON NEW 2017 CHEVROLET SILVERADO 1500. THE VEHICLE WAS PURCHASED NEW AND DRIVEN UNDER 55 MPH FOR THE FIRST 500 MILES. AFTER THE FIRST 500 MILES AND BEGINNING TO DRIVE HIGHWAY SPEEDS, BETWEEN 60 - 75+ MILES PER HOUR, A WOBBLE/VIBRATION/SHAKE BEGAN TO OCCUR. WHEN THE WOBBLE/VIBRATION/SHAKE BEGINS THE DRIVER FEELS THAT CONTROL OF THE VEHICLE IS BEING LOST AND THE DRIVER MUST DECREASE THE SPEED, WHICH IS ABLE TO BE ACCOMPLISHED WITH BOTH RELEASING FOOT OFF OF THE ACCELERATOR OR LIGHTLY BREAKING, IN ORDER TO REGAIN CONTROL. THE VEHICLE HAS BEEN TO THE DEALER FOR FRONT LEFT WHEEL REPLACEMENT DUE TO THE INABILITY OF ORIGINAL TIRE TO BE BALANCED, THE VEHICLE HAS FIELD

FORCE BALANCING 3 TIMES, AND THE LEFT FRONT AXLE BOOT HAS BEEN REPLACED. AFTER SEVERAL ATTEMPTS TO CORRECT THE WOBBLE/VIBRATION/SHAKE, THE VEHICLE NOW HAS ~10,000 MILES, THE WOBBLE/VIBRATION/SHAKE CONTINUES TO OCCUR AT HIGHWAY SPEEDS.

46. A consumer complaint dated 01/01/2017 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: VEHICLE SHAKES AND VIBRATES HORRIBLY AT HWY SPEEDS I HAVE TAKEN IT TO THE DEALERSHIP WITH NO FIX SAME PROBLEM.

47. A consumer complaint dated 01/02/2017 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: 2015 GMC YUKON. CONSUMER WRITES IN REGARDS TO BAD TIRE VIBRATION WHEN DRIVING AT CERTAIN SPEEDS. \*LD THE CONSUMER STATED THE TIRES ON HIS SUV DO NOT QUALIFY UNDER THE RECALL, BECAUSE OF THE YEAR THEY WERE MANUFACTURED.\*JB.

48. A consumer complaint dated 01/11/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: TL\* THE CONTACT RENTED A 2017 CHEVROLET SILVERADO 1500. WHILE DRIVING APPROXIMATELY 55 MPH, THE VEHICLE VIBRATED VIOLENTLY. THE CONTACT NOTICED THAT THE VOLTAGE REGULATOR DROPPED TO 10.5. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 2,061.

49. A consumer complaint dated 02/01/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: TRUCK EXHIBITS A ROUGH IDLE AFTER TRUCK IS DRIVEN AND WARM. IDLE CAUSES TEH TRUCK TO SHAKE AND FEELS

LIKE IT WILL DIE AT STOPS. RPM DROPS BELOW 300 RPM THEN GOES BACK TO 490 RPM. IN ADDITION THE TRUCK WILL START TO SHAKE AND VIBRATE AT HIGHWAY SPEEDS OF 75-80 MPH. GMC SERVICE PERFORMED TSB CHANGING OUR ENGINE MOUNTS BUT THAT HAS NOT FIXED THE ISSUE. THIS IS A KNOWN ISSUE ON SILVERADOS AND NO FIX IN SITE. CONCERNED WITH SEAT VIBRATION THIS IS A SAFETY ISSUE DUE TO POTENTIAL DRIVE TRAIN PART FAILURE.

50. A consumer complaint dated 02/01/2017 and submitted to NHTSA states the following regarding a 2016 Chevrolet Suburban: CAR SHAKES AT SPEEDS OVER 65MPH WITH NO SOLUTION FROM DEALER OR CHEVROLET AFTER MULTIPLE TRIPS TO DEALER FOR A PERMANENT REPAIR. OR RESPONSE FROM CHEVROLET CUSTOMER SERVICE.

51. A consumer complaint dated 03/23/2017 and submitted to NHTSA states the following regarding a 2017 GMC Sierra: HEAVY VIBRATION BETWEEN 1200 RPM AND 1500 RPM ANYWHERE BELOW 45 MPH AND ABOVE 70 MPH.

52. A consumer complaint dated 03/27/2017 and submitted to NHTSA states the following regarding a 2017 GMC Sierra: MY NEW 2017 GMC SIERRA VIBRATES BADLY AT ALL SPEEDS ABOVE 40 MPH. THE SHAKE IN THE STEERING WHEEL CAUSES MY HANDS TO GO NUMB AND IS A SAFETY ISSUE. I HAVE INFORMED GM OF THIS AND HAD IT REPAIRED 3 TIMES. THIS DIDN'T CORRECT THE ISSUE AND GM IS STATING THE VEHICLE IS "OPERATING AS DESIGNED" AND WILL NOT DO ANY FURTHER REPAIRS. IT IS HARD TO BELIEVE THAT IN THIS DAY AND AGE A VEHICLE IS DESIGNED TO HAVE A CONSTANT VIBRATION. THIS ISSUE HAS BEEN GOING ON SINCE MODEL YEAR 2014 AND GM WILL NOT ACKNOWLEDGE OR CORRECT THE

ISSUE. IT IS GOING TO TAKE SOMEONE'S SERIOUS BODILY INJURY OR DEATH FOR THEM TO LOOK INTO THE PROBLEM. PLEASE OPEN AN INVESTIGATION INTO ALL GM HALF TON TRUCKS FROM MODEL YEAR 2014 THROUGH 2017.

53. A consumer complaint dated 05/01/2017 and submitted to NHTSA states the following regarding a 2016 GMC Sierra: VIBRATION BETWEEN 65-80MPH. DEALER HAS ROAD FORCE BALANCED TIRES TWICE WITH NO BETTER RESULTS. FIRST TIME ONE TIRE WAS FOUND TO BE OUT OF SPEC THEN 2ND TIME, ALL FOUR ARE IN 'SPEC'. I DON'T BELIEVE THIS IS A TIRE/WHEEL PROBLEM AS THE VIBRATION VARIES ON SMOOTH HIGHWAY - AT TIMES IT IS VERY SMOOTH THEN IT WILL START VIBRATING/BOUNCING. VERY UNNERVING DRIVING AT THESE SPEEDS WITH A VIBRATION THAT FEELS LIKE A LOOSE WHEEL OR OTHER DRIVETRAIN PART. MY SON HAD A 2015 MODEL HE BOUGHT NEW AND HE FINALLY SOLD IT DISCLOSING THE ISSUE (STILL UNDER WARRANTY) RATHER THAN CONTINUING TO WASTE TIME WITH GM. PROBLEM HAS EXISTED SINCE I BOUGHT THE TRUCK NEW OCT. 2016. 2016 GMC SIERRA 2500HD DENALI 20" FACTORY WHEELS.

54. A consumer complaint dated 05/01/2017 and submitted to NHTSA states the following regarding a 2015 Cadillac Escalade: VEHICLES START VIBRATING WHEN HIT SPEEDS RANGING FROM 40 TO 60 MILES PER HOUR. DEALER DOESN'T TAKE SERIOUSLY. I AM VERY CONCERNED ABOUT THIS HUGE SAFETY ISSUE.

55. A consumer complaint dated 05/06/2017 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: 2015 CHEVY SUBURBAN SHAKES UNCONTROLLABLY STARTING AT 50 MPH. PEAK OF SHAKING AT 77 MPH.

INCREASED WEIGHT SEEMS TO INCREASE EFFECT SUCH AS FULL TANK VS LOW. VEHICLE IS IN MOTION.

56. A consumer complaint dated 05/07/2017 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: BOUGHT A USED 2015 SUBURBAN NOTICED A VIBRATION YOU CAN HEAR AND FEEL BETWEEN 40-60 MPH. TRIED TO GET IT FIXED BUT NO ONE KNOWS WHAT IS CAUSING IT ON 4TH VISIT TO GET IT FIXED RIGHT NOW HAVE HAD IT FOR 3 WEEKS TRIED TO GET DEALER TO TAKE IT BACK AND THEY REFUSED AFTER FIXING BRAKE ROTORS. IT IS ALSO HAVING PROBLEMS DOWNSHIFTING. RANDOMLY. WILL DOWNSHIFT WHILE MAINTAINING SPEEDS OF 50-55 MPH TO 38 WITH NO WARNING WILL MAKE GRINDING NOISES AND AM UNABLE TO STEER OR BREAK. AFRAID MY FAMILY IS GOING TO GET REAR ENDED WHILE IT'S HAPPENING. CAN'T ACCELERATE OR DO ANYTHING WHILE IT'S HAPPENING. DO NOT FEEL SAFE DRIVING MY FAMILY IN THIS CAR BUT IT'S WHAT WE HAVE.

57. A consumer complaint dated 05/15/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: VEHICLE SHAKES OR VIBRATES AT MOST SPEEDS. THE VIBRATION IS WORST AT 25-45 AND 65MPH+. IT CAUSES DRIVER FATIGUE AND NAUSEA. TIRES HAVE BEEN ROAD FORCED BALANCED BY DEALER AND DRIVE SHAFT REPLACED IN ATTEMPTS TO FIX PROBLEM. NO SOLUTION HAS BEEN FOUND BY DEALER. DEALER ACKNOWLEDGES THE VIBRATIONS AND SAYS THE VIBRATION IS NORMAL OPERATION FOR THIS VEHICLE LEADING ME TO BELIEVE THAT A RECALL SHOULD BE ISSUED.

58. A consumer complaint dated 06/21/2017 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: A STRONG VIBRATION OR "SHUDDER" RESONATES THROUGHOUT THE BODY OF THE ENTIRE CABIN. FEELS LIKE YOU ARE DRIVING OVER LARGE RUMBLE STRIPS, EVEN WHEN THE ROAD IS COMPLETELY SMOOTH. APPEARS TO OCCUR AT SPEEDS GREATER THAN 30 MILES PER HOUR AND WHEN THE RPMS EXCEED 1,000 RPM. THE RPM NEEDLE "JUMPS" REPEATEDLY WHILE THE VIBRATION/SHUDDER OCCURS. WHEN WE TOOK IT TO THE LOCAL GMC DEALER, THEY TOLD US IT WE NEEDED A NEW WHEEL FOR WHICH WE BOUGHT AND IT ACCOMPLISHED NOTHING. THEN, WE RETURNED IT, DESCRIBED THE PROBLEM IN EXCRUCIATING DETAIL - EVEN REFERENCING KNOWN PUBLIC SERVICE BULLETINS - WHICH PROMPTED THEM TO "BALANCE THE TIRES." LEFT THE GMC DEALERSHIP AGAIN AND IT WAS OBVIOUS THE DEALERSHIP DID NOT ADDRESS THE PROBLEM AND THAT IT HAD NOTHING TO DO WITH THE WHEELS. WE RETURNED AND ADVISED THEM THEY DID NOT FIX THE PROBLEM. THE KEPT THE DENALI AGAIN AND THEN ADVISED US THEY WERE "100% SURE" THE PROBLEM WAS THE "SHOCKS". THEY REPLACED THE SHOCKS FOR NEARLY \$2,000 AND ADVISED US BY PHONE THE PROBLEM WAS "FIXED." I ASKED THE REPRESENTATIVE IF THEY HAD CONFIRMED IT WAS FIXED AND HE SAID "YES", THE TECHNICIAN HAD DRIVEN THE VEHICLE AND THERE WERE NO FURTHER ISSUES. MINUTES LATER, I GOT A CALL FROM THE SERVICE MANAGER WHO ADVISED THE CUSTOMER SERVICE REPRESENTATIVES CALL TO ME WAS "PREMATURE" (I GUESS HE FINALLY DECIDED TO DRIVE THE VEHICLE) AND ADVISED THERE WAS A PROBLEM WITH THE TORQUE CONVERTER AND THAT HE

NEEDED TO KEEP IT FOR A FEW MORE DAYS. I ASKED WHY HE THEY HAD TOLD ME THEY WERE "100% SURE" THE PROBLEM WAS THE SHOCKS AND HE ADVISED HE DROVE IT AND THEY "SEIZED" UP. WE ARE STILL AWAITING SOME RESOLUTION TO THIS \$75,000 NEW VEHICLE DISASTER. THIS IS THE FIRST AMERICAN VEHICLE WE HAVE PURCHASED AND ARE CERTAINLY REGRETTING THAT DECISION AND ARE CURRENTLY RESEARCHING OTHER FULL-SIZE SUVs FOR BETTER SAFETY AND RELIABILITY.

59. A consumer complaint dated 07/11/2017 and submitted to NHTSA states the following regarding a 2015 Chevrolet Silverado: HAD A VIBRATION PROBLEM WITH THIS 2015 SILVERADO 2500HD SINCE NEW SEPT. 2015 AT DIFFERING SPEEDS, FELT IN THE SEAT AND CENTER CONSOLE. VIBRATION IS ON CITY STREETS, HIGHWAYS, ALL ROADS. CENTER CONSOLE HAS A VERY NOTICEABLE SHAKE TO IT. VIBRATION AT TIMES IS MODERATE, AT OTHER TIMES MORE SEVERE. AT 2500 MILES BROUGHT TO GWATNEY CHEVROLET IN JACKSONVILLE, AR. THREE GOODYEAR TIRES REPLACED, ROAD FORCED BALANCED. AT 11,000 MILES BROUGHT TO GWATNEY CHEVROLET TWO MORE GOODYEAR TIRES REPLACED, ROAD FORCED BALANCED. IN GWATNEY NOTES, IT TOOK NINE TIRES TO FIND TWO GOOD TIRES TO PUT ON MY TRUCK. AT 18,000 MILES RETURNED TO GWATNEY CHEVROLET, SERVICE MANAGER STATED THE PROBLEM WAS THE TIRES AND I WOULD HAVE TO PAY A PORTION OF THE COST. MY RESPONSE WAS I SHOULDN'T HAVE TO PAY FOR A PROBLEM THAT THE TRUCK HAD SINCE IT WAS NEW. THE SERVICE MANAGER WAS HOSTILE, ARGUMENTATIVE AND REFUSED TO DO ANY MORE WORK ON THE TRUCK. I COMPLAINED TO GM CUSTOMER CARE, THEY WANTED TO GIVE ME \$100

AND CLOSE THE CASE. I ESCALATED MY COMPLAINT TO THE GM EXECUTIVE LEVEL, THEY APPEAR TO BE MORE ACCOMMODATING, THEY STATED THEY ARE GOING TO HAVE A GM TECHNICAL ASSISTANCE TEAM LOOK AT MY PROBLEM. RIGHT NOW, I'M AWAITING FURTHER RESPONSE FROM GM.

60. A consumer complaint dated 07/11/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: MY VEHICLE VIBRATES AND SHAKES AT VARYING SPEED BUT MOSTLY BETWEEN 60 AND 75MPH. I HAVE BEEN TO DEALERSHIP THREE TIMES FOR DIAGNOSIS AND TIRES REPLACED TWICE. THE DEALERSHIP TESTED THE VEHICLE WITH SENSORS AND CAN NOT ISOLATE THE VIBRATION. I HAVE ONLY HAD VEHICLE A FEW MONTHS AND QUESTION THE SAFETY OF THE VEHICLE. I WISH I HAD RESEARCHED THE TRUCK ON THE INTERNET PRIOR TO PURCHASE BECAUSE THE PROBLEM I AM HAVING IS KNOWN AND HAS A NAME "THE CHEVY SHAKE" I HOPE OTHERS WILL CONTINUE TO REPORT THESE CONCERNS BECAUSE CHEVROLET NEEDS TO RECOGNIZE THEY HAVE A PROBLEM AND ADDRESS THE ISSUE WITHOUT THE RUNAROUND CUSTOMERS ARE BEING FORCED TO ENDURE. THE VEHICLE ISSUE NEEDS A RECALL.

61. A consumer complaint dated 08/12/2017 and submitted to NHTSA states the following regarding a 2015 GMC Yukon Denali XL 1500: VEHICLE VIBRATES DURING DRIVING SPEEDS ABOVE 35 MPH. HAD TIRES ROTATED AND BALANCED, STILL VIBRATED, REPLACED TIRES AND RECEIVED 4 WHEEL ALIGNMENT, STILL SHAKES BAD. WHEN TRAVELING AT SPEEDS ABOVE 35, SEATS STARTS TO SHAKE AS IF YOU

ARE TRAVELING OVER A BAD BUMPY ROAD. THIS OCCURS BOTH ON CITY STREETS AND HIGHWAYS.

62. A consumer complaint dated 08/23/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: I HAVE BEEN DRIVING A 2017 CHEVROLET SILVERADO 1500 Z71 PICK-UP TRUCK SINCE FEBRUARY 2017. SINCE NEARLY DAY ONE, THE VEHICLE HAS EXPERIENCED VIBRATION AND WOBBLE LIKE SHAKING NOTICEABLE AT NORMAL HIGHWAY SPEEDS, BECOMING MORE NOTICEABLE ABOVE 60 MPH. AT CERTAIN INSTANCES THE VEHICLE BEGINS TO EXPERIENCE A MILD BOUNCING. THE VEHICLE HAS BEEN IN TO THE DEALERSHIP TO REPAIR THE PROBLEM FOUR TIMES OVER THE COURSE OF OWNERSHIP (APX. SIX MONTHS AT THE TIME OF THIS SUBMISSION) AND APPROXIMATELY 10,000 DRIVING MILES AND THE ISSUE STILL IS ONGOING. THE DEALER STATED THAT THEY ARE UNABLE TO REPAIR THE PROBLEM. THE DEALERSHIP HAD CALLED IN A FIELD ENGINEER TO HELP WITH THE ISSUE, TWICE, THEY AS WELL, UNABLE TO REPAIR THE PROBLEM. THE DEALERSHIP HAS REPLACED NUMEROUS TIRES, ROAD FORCE BALANCED WHEELS AND TIRES, REPLACED SUSPENSION BUSHINGS, STEERING GEAR BOX, STEERING BUSHINGS, UNMOUNTED THE BODY FROM THE CHASSIS AND UNBOLTED THE EXHAUST SYSTEM, REASSEMBLING IN A DIFFERENT PATTERN, REMOVED CALIPER CLIPS, AND MADE OTHER CHANGES. THE ISSUE STILL EXISTS. FOLLOWING THEIR ATTEMPT TO REPAIR THE ISSUE, THE VEHICLE NOW MAKES A CLUNK NOISE WHEN EXECUTING A TIGHT TURNING RADIUS AND DRIVING OVER A SMALL BUMP (SUCH AS A DRIVEWAY APRON). WHEN THE

SHAKING / VIBRATION OCCURS, THE VEHICLE FEELS UNSTABLE AND FEELS AS IF THERE MAY BE A LOSS OF CONTROL.

63. A consumer complaint dated 09/01/2017 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: CAR EXHIBITS SHAKING/VIBRATIONS AT SPEEDS ABOUT 65MPH, WHICH AT TIMES IS ACCOMPANIED BY A BUFFETING SOUND.

64. A consumer complaint dated 09/26/2017 and submitted to NHTSA states the following regarding a 2017 GMC Sierra: VIBRATION 65+ MPH, FELT IN STEERING WHEEL AND SEAT. STEERING WHEELS QUIVERS AT 65+ MPH. TRUCK FEELS VERY UNSTABLE AT HIGHWAY SPEEDS. DEALER STATES IT'S NORMAL.

65. A consumer complaint dated 09/28/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: THIS VEHICLE, LIKE MANY OTHERS OF THIS SAME DESIGN, HAS HAD A VIBRATION AT HIGHWAY SPEEDS SINCE THE VEHICLE WAS PURCHASE ON 9-14-2017. IT HAS BEEN ADDRESSED BY THE DEALER FOUR TIMES WITH THE TIRES BEING THE PRESUMED ISSUE. THE VIBRATION HAS CONTINUED EVEN AFTER DIFFERENT TIRES INSTALLED AND RECENTLY THE VIBRATION CAUSED THE VEHICLE TO BEGIN TO DRIFT TOWARD THE EDGE OF THE ROADWAY WHILE TRAVELLING AT 70 MPH IN A 70 MPH SPEED ZONE IN A CURVE THAT WAS NOT POSTED WITH A REDUCED SUGGESTED SPEED. THE TRUCK HAS CURRENTLY BEEN AT THE GENERAL MOTORS DEALER IN DELAWARE OHIO FOR EIGHT DAYS WHERE THEY HAVE VERIFIED THE ISSUE, HAVE NOT BEEN ABLE TO LOCATE A CAUSE AND HAVE NOTIFIED GENERAL MOTORS FOR GUIDANCE. WHILE RESEARCHING THIS ISSUE I HAVE FOUND THAT IT APPEARS TO BE A LONG TERM

ISSUE FOR THIS MANUFACTURER THAT IS NOT BEING ADDRESSED. BEING A RETIRED STATE TROOPER WHO HAS DRIVEN MANY MANY MILES IN HIS CAREER, I FEEL THIS SITUATION COULD CAUSE A SERIOUS SAFETY ISSUE THAT COULD POTENTIALLY CAUSE A LOSS OF CONTROL AND CONTRIBUTE TO INJURIES OR WORSE TO THE VEHICLE OCCUPANTS. PERSONNEL AT THE DEALERSHIP HAVE CONFIRMED TO ME THAT THEY HAVE HEARD OF THIS SITUATION AND THAT SOME TRUCKS ARE ABSOLUTELY PERFECT WHILE OTHERS DEVELOP THIS CONTINUING PROBLEM. THIS VIBRATION BEGINS AT APPROXIMATELY 68 MPH AND CONTINUES TO AT LEAST 76 MPH AND IS FELT THROUGH THE SEAT, ACCELERATOR AND STEERING WHEEL. I DO HAVE SOME OF THE ""REPAIR"" DOCUMENTS BUT THEY ARE INCOMPLETE AT THIS TIME.

66. A consumer complaint dated 10/15/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: TL\* THE CONTACT OWNS A 2017 CHEVROLET SILVERADO. WHILE DRIVING VARIOUS SPEEDS, THE VEHICLE WOULD VIBRATE. THE VEHICLE WAS TAKEN TO HUFFINES CHEVROLET (1400 STEMMONS FWY, LEWISVILLE, TX 75067) WHERE IT WAS DIAGNOSED THAT THE TIRES WERE OUT OF BALANCE AND THE FRONT DRIVER'S TIRE NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE PERSISTED. THE VEHICLE WAS TAKEN TO CLASSIC CHEVROLET (3991, 1101 TX-114, GRAPEVINE, TX 76051) WHERE IT WAS DIAGNOSED THAT THE MOTOR MOUNT NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED. THE MANUFACTURER WAS NOT NOTIFIED. THE APPROXIMATE FAILURE MILEAGE WAS 3,000.

67. A consumer complaint dated 10/16/2017 and submitted to NHTSA states the following regarding a 2017 Cadillac Escalade: TL\* THE CONTACT OWNS A 2017 CADILLAC ESCALADE. WHILE DRIVING VARIOUS SPEEDS, THERE WAS AN ABNORMAL SHUDDERING AND VIBRATION FROM THE VEHICLE. THE CONTACT ALSO STATED THAT THE VEHICLE FAILED TO SHIFT INTO GEARS PROPERLY. THE VEHICLE WAS TAKEN TO DALE EARNHARDT JR. BUICK/GMC (1850 CAPITAL CIR NE, TALLAHASSEE, FL 32308, (850) 270-1453) WHERE IT WAS DIAGNOSED THAT THE TORQUE CONVERTER WAS POSSIBLY DEFECTIVE. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE RECURRED. ADDITIONALLY, THE CONTACT STATED THAT THREE OF THE FOUR TIRES WERE ALSO REPLACED; HOWEVER, THE VIBRATION AND SHUDDERING PERSISTED. THE MANUFACTURER WAS NOT NOTIFIED OF THE FAILURE. THE APPROXIMATE FAILURE MILEAGE WAS 6,000. \*JS.

68. A consumer complaint dated 10/19/2017 and submitted to NHTSA states the following regarding a 2017 GMC Sierra: TL\* THE CONTACT OWNS A 2017 GMC SIERRA 1500. WHILE DRIVING 75 MPH, THE VEHICLE VIBRATED WITHOUT WARNING. THE VEHICLE WAS TAKEN TO CREST AUTO WORLD AT (603) 356-5401 LOCATED ON 802 EASTMAN RD, CENTER CONWAY, NH 03813 WHERE NO DIAGNOSTIC FAILURE CODES WERE FOUND AND THE FAILURE COULD NOT BE DUPLICATED. THE VEHICLE WAS NOT REPAIRED. THE VEHICLE WAS THEN TAKEN TO ROBERTSON'S GMC TRUCK AT (508) 273-2935 LOCATED ON 2680 CRANBERRY HWY, WAREHAM, MA 02571 WHERE IT WAS DIAGNOSED THAT ALL FOUR TIRES NEEDED TO BE REPLACED. ALL FOUR TIRES WERE REPLACED; HOWEVER, THE FAILURE RECURRED. THE MANUFACTURER WAS NOTIFIED AND TRANSFERRED THE

CONTACT TO THE NHTSA HOTLINE WITHOUT NOTICE. THE APPROXIMATE FAILURE MILEAGE WAS 648.

69. A consumer complaint dated 10/30/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: NOTICED AFTER PURCHASE THAT THERE IS VIBRATION LIKE A BAD TIRE 35-42 MPH. VIBRATION FELT IN SEAT, CONSOLE AND STEERING WHEEL 58-65 MPH. TRANSMISSION DOWN SHIFTS HARD SOMETIMES FEELS LIKE BEING BUMPED FROM BEHIND, IT ALSO HESITATES AND JERKS AFTER LETTING OFF THE ACCELERATOR AND ACCELERATING AGAIN BETWEEN 25-45 MPH. WHEN ACCELERATING IT SURGES, JERKS AND STUMBLES. SOMETIMES WHEN ACCELERATING THE TRANSMISSION DOWNSHIFTS AND HANGS IN THAT GEAR UNTIL YOU LET OFF THE ACCELERATOR.

70. A consumer complaint dated 11/07/2017 and submitted to NHTSA states the following regarding a 2016 Chevrolet Suburban: I JUST PURCHASED THIS VEHICLE A MONTH AGO AND ALREADY RECEIVED A RECALL FOR THE SOFTWARE AIRBAG ISSUE. I TRADED MY 2010 CHEVY SUBURBAN FOR THIS NEW ONE AND HAVE NOTICED THAT THE MOMENT I GET ONTO THE FREEWAY AND START TO ACCELERATE THE CAR STARTS TO VIBRATE SO BAD THAT ANYTHING IN THE MIDDLE CONSOLE STARTS TO RATTLE AND THE CONSOLE WILL SPILL ANY DRINKS SITTING THERE IN THE CUPHOLDERS. I HAVE OWNED CHEVY VEHICLES ALL MY LIFE AND AM VERY ANNOYED THAT THIS IS HAPPENING. SOMETHING IS SERIOUSLY WRONG. I ALSO JUST NOTICED THAT THERE IS A RECALL FOR THE SUSPENSION RECALL 42190 AND PARTS ARE NOT AVAILABLE AT THIS TIME I JUST BOUGHT THIS VEHICLE IN SEPT 2016 AND IT ONLY HAS 800 MILES ON IT AND

NOTICES WENT OUT MAY-JUNE 2016 AND I WAS NOT MADE AWARE WHEN I PURCHASED THIS VEHICLE. I WILL ALSO TALK TO THE DEALERSHIP ACCORDING TO THIS RECALL THE VEHICLE SHOULD NOT BE DRIVEN UNTIL IT'S FIXED. WHO WAS GOING TO TELL ME THIS HAD I NOT LOOKED IT UP AND NOT DRIVING IT IS IMPOSSIBLE IT'S OUR ONLY VEHICLE AND WERE A FAMILY OF 7. FOUR OF THOSE ARE MY BABIES. I ALSO WILL BE TAKING IT IN DUE TO THE RECALL 16007. THE VIBRATION OF THE VEHICLE WILL ALSO BE DISCUSSED AS WELL.

71. A consumer complaint dated 12/29/2017 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: JUST BOUGHT A NEW 2017 BLACK EDITION. REG CAB SHORT BED. 5.3. SHAKES FROM NEW OVER 73+ MPH. TOOK IT TO DEALER AT 648 MILES ON 01/19/2018. PURCHASED NEW 12/28/2017 THEY REBALANCED ALL 4 WHEELS. STILL SHAKES. THEY PUT A NEW DRIVESHAFT IN AND SAID IT WAS FIXED. I PICKED IT UP TODAY. NOPE. IT'S WORSE. NOW IT BEGINS SHAKE NO AT 60 AND AT 74-75 HAS A PRETTY DRAMATIC SHAKE. THIS HAPPENS WHILE DRIVING ON THE INTERSTATE. NOW I GO BACK AGAIN MONDAY TO LET THEM HAVE ANOTHER GO AT IT. THIS IS A BRAND NEW TRUCK.

72. A consumer complaint dated 02/25/20218 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: I PURCHASED A NEW (175 MILES) 2017 CHEVROLET SILVERADO LS 4X4 FROM A DEALERSHIP ON 2/10/2017. I NOTICED THE RIDE WAS A BIT BUMPY ON THE 80 MILE RIDE HOME FROM THE DEALERSHIP, BUT THOUGHT NOTHING OF IT. THE NEXT TIME I DROVE IT WAS 2 WEEKS LATER (I WAS ON BUSINESS TRAVEL IN BETWEEN AND LET THE TRUCK SIT IN MY GARAGE), AND I DROVE IT AROUND TOWN ON 2/25/2017. IN ADDITION TO A MINOR ROUGH IDLE,

IT WAS VERY BUMPY. IT WOULD SHAKE AT VIRTUALLY ALL SPEEDS. AFTER MY 5 MINUTE DRIVE FROM THE GROCERY STORE, I LITERALLY FELT DIZZY AND ILL. THE NEXT MORNING ON 2/26/2018, I DROVE IT TO WORK (25 MILES), AND EXPERIENCED THE SAME FEELINGS OF MOTION SICKNESS. I AM A CERTIFIED AUTO TECHNICIAN WITH NEARLY 20 YEARS EXPERIENCE, AND HAVE WORKED ON ALL COMPONENTS OF CARS AND TRUCKS (ENGINE REPAIR / OVERHAUL, TRANSMISSION, SUSPENSION, BRAKES, ELECTRICAL, HEATING / AC, ETC.). I'VE WORKED ON TRUCKS SPANNING A WIDE RANGE OF YEARS WITH VARIOUS ISSUES AND MILEAGES (LOW MILEAGE TO +250,000 MILES). I HAVE NEVER FELT A MORE UNCOMFORTABLE RIDE IN A TRUCK IN MY YEARS OF TEST DRIVING VEHICLES (BEFORE AND AFTER REPAIR) THAN I HAVE WITH THIS NEW 2017 SILVERADO.

73. A consumer complaint dated 03/22/2018 and submitted to NHTSA states the following regarding a 2017 Chevrolet Silverado: PURCHASED MY 17 CHEVROLET SILVERADO 1500 ON 11/28/17 AND RETURNED IT TO THE DEALERSHIP ON 12/1/17. THIS WAS DUE TO A SEVERE SHUDDERING & SHIFTING IN THE TRANSMISSION & SEVERE SHAKE IN THE FRONT END AT 70-90MPH. THEY BALANCED & ROTATED THE TIRES, SAYING THE ISSUE WAS FIXED, I PICKED THE VEHICLE BACK UP ON 12/4/17 BUT THE ISSUE WAS NOT FIXED & AN ELECTRICAL ISSUE HAD ALSO OCCURRED. I TOOK THE VEHICLE BACK ON 12/7/18 WITH THE SAME COMPLAINTS REGARDING THE TRANSMISSION & SHAKING IN THE FRONT END, AS WELL AS THE ELECTRICAL ISSUE. THE PROBLEM ELECTRICALLY WAS WHILE SITTING AT A STOPLIGHT THE BRIGHT LIGHTS FLASHED & THE RADIO/NAVIGATION SCREEN WENT BLANK. THE DEALERSHIP CALLED ME ON 12/8/17, TOLD ME THEY HAD BEEN

UNABLE TO DUPLICATE THE ISSUES, FINDING NOTHING WRONG. I LEFT IT OVER THE WEEKEND, WENT IN MONDAY MORNING & SPOKE TO THE SERVICE MANAGER DIRECTLY. HE TOLD ME HE HAD PURCHASED THE SAME VEHICLE WITH THE SAME TRANSMISSION ISSUES. SAID THERE WAS A POSSIBLE FIX BY EXCHANGING THE TRANSMISSION FLUID & THEY WOULD USE A NEW MACHINE PICO TO CHECK IT OUT. THEY HAD TO REPLACE THE TORQUE CONVERTER DUE TO MALFUNCTIONING & PERFORM A PROGRAMMING MODULE UPDATE ON RADIO, I PICKED IT UP ON 12/22/17, ISSUE WITH THE TRANSMISSION WAS STILL NOT RESOLVED. I TOOK IT TO A DIFFERENT DEALERSHIP FOR TRANSMISSION SHUDDER, SHIFT & SHAKE ISSUE MOST NOTICEABLE AT 70-90MPH, & RADIO ISSUE. THEY WERE ADVISED TO PERFORM A MODULE UPDATE ON THE TRANSMISSION & GIVEN 2 OPTIONS ON THE RADIO, THEY CHOSE TO REPLACE THE SCREEN. I TOOK IT BACK TO THAT SAME DEALERSHIP, MODULE UPDATE MADE TRANSMISSION/FRONT END ISSUE WORSE, ESPECIALLY COMING OUT OF A CURVE. THEY'VE REPLACED MY 2 BACK TIRES SAID THEY WERE BAD & SHOULD FIX THE SHAKING ISSUE IN THE FRONT END. UNABLE TO DUPLICATE TRANSMISSION ISSUES THUS THEY CANNOT REPAIR IT. OWNERS WITH THE SAME ISSUES ARE BEING TOLD GM KNOWS BUT CAN'T FIX TRANSMISSION ISSUE.

74. A consumer complaint dated 04/02/2018 and submitted to NHTSA states the following regarding a 2016 GMC Yukon Denali XL 1500: WATER LEAK DUE TO BAD FRONT WINDSHIELD SEAL, WATER LEAK THROUGH GPS ANTENNA, FOUR WHEEL DRIVE MODULE WAS BAD, DVD PLAYER STOPPED WORKING, AND LASTLY A HORRIBLE VIBRATION THAT OCCURRED AROUND 77-83 MPH. TO THE POINT THE

VEHICLE DID NOT FEEL SAFE TO HANDLE. TRIM ON THE B POST KEPT COMING LOOSE. THIS ALL OCCURRED IN OVER A YEARS PERIOD OF TIME. THIS WAS MY SECOND VEHICLE BECAUSE I TRADED IN MY 2015 TAHOE BECAUSE IT WAS HAVING MANY OF THE SAME ISSUES AND MORE. GM DID REPAIR ALL ISSUES OTHER THAN THE SHAKING, THEY WANTED ME TO BUY TIRES AND AFTER READING OTHER COMPLAINTS ON THE SHAKING I REFUSED, THE TIRES ONLY HAD 25,800ISH MILES ON THEM.

75. A consumer complaint dated 06/12/2018 and submitted to NHTSA states the following regarding a 2017 Chevrolet Tahoe: SHAKE/SHUDDER WHILE DRIVING STRAIGHT ON HIGHWAY AT 72 MPH UP TO AT LEAST 90 MPH. STEERING WHEEL, CENTER COUNSLE, AND SEATS SHAKE. GOES AWAY WHEN NOT ACCELERATING. BALANCED TIRES AND DID NOT FIX. DEALER THEN BALANCED TIRES AND ALIGNMENT WAS COMPLETED. THIS ALSO DID NOT FIX. DEALER KEPT MY CAR FOR ALMOST 2 WEEKS AND REPLACED TORQUE CONVERTER. THIS STILL DID NOT FIX IT. HAVE TO TAKE IT IN FOR A 3RD TIME. MAKE ME FEEL DIZZY AND NAUSEOUS.

76. A consumer complaint dated 06/14/2018 and submitted to NHTSA states the following regarding a 2015 Chevrolet Suburban: WHEN TRAVELING AT INTERSTATE HIGHWAY SPEEDS VEHICLE HAD SHAKING, SHIMMYING, VIBRATION AND BUFFETING AS WELL AS LOUD HUM AND WIND NOISE CAUSING NAUSEA RESULTING IN NAUSEA AND DIZZINESS TO THE DRIVER. THIS WAS WORSE ON NEW MACADAM AND ON GROOVED HIGHWAY BUT OCCURRED INTERMITTENTLY ON OTHER SURFACES, I JUST PURCHASED THIS VEHICLE USED AND IT IS

CERTIFIED. I WAS UNAWARE THAT THIS IS A COMMON ISSUE AND UNDERSTAND NOW THAT THERE IS NO RECALL TO FIX THIS AND THAT GM HAS NOT FOUND A PERMANENT SOLUTION TO THE PROBLEM. THE VEHICLE WAS ALSO EXHAUSTING TO DRIVE ON THE HIGHWAY BECAUSE OF THE AFOREMENTIONED ISSUES.

77. A consumer complaint dated 10/05/2018 and submitted to NHTSA states the following regarding a 2016 Cadillac Escalade: SHUDDER / VIBRATION BETWEEN 45 - 65 MPH. CAUSE WAS TORQUE CONVERTER. 85 - 90% OF VIBRATION WAS MITIGATED. CONTINUE TO HAVE STEADY VIBRATIONS 65 -70MPH AND ABOVE. DEALER ALSO INSTALLED NEW TIRES / WHEELS AND I HAVE HAD A ROAD FORCE BALANCE.

78. A consumer complaint dated 10/10/2018 and submitted to NHTSA states the following regarding a 2015 Cadillac Escalade: VEHICLE VIBRATES EXCESSIVELY WHEN DRIVING. AT FIRST I THOUGHT IT WAS DUE TO ROAD CONDITIONS BUT THEN REALIZED THE VIBRATION RESIGNATES FROM MY VEHICLE DRIVETRAIN. TOOK IT TO DEALERSHIP AND THEY INFORMED ME IT'S MY TORQUE CONVERTER. APPARENTLY THERE ARE MANY COMPLAINTS WITH THIS ISSUE WITH 6 SPEED TRANSMISSION OPERATED VEHICLES FROM GM. STILL WAITING ON RECAL FROM GM TO BE PUBLISHED.

79. A consumer complaint dated 10/31/2018 and submitted to NHTSA states the following regarding a 2016 Cadillac Escalade: THIS VEHICLE IS ABOUT TO SHAKE ME OUT OF IT. THE SUN ROOF EVEN SHAKES AT ALL SPEEDS AND AT ALL TIME. A \$50,000.00 PIECE OF JUNK. I'M EMBARRASSED TO LET SOMEONE RIDE WITH ME. IT'S UNSAFE!!!"