### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TEXARKANA DIVISION

JOHN J. HARRRIS, ON BEHALF OF HIMSELF AND ALL OTHERS SIMILARLY SITUATED,		
Plaintiff		
v.	Civil Action No.	
GENERAL MOTORS COMPANY		
Defendants		

### **CLASS ACTION COMPLAINT**

COMES NOW, JOHN J. HARRIS, Plaintiff, on behalf of himself and all others similarly situated, and for his Class Action Complaint against GENERAL MOTORS COMPANY (hereinafter Defendant GM or GM) respectfully alleges the following:

### **PARTIES**

1. Plaintiff is a citizen of Bowie County, Texas, and pursuant to FED. R. CIV. P. Rule 23(b)(2) and (b)(3), Plaintiff seeks certification of the following Classes:

The "Texas Class" for Counts One through Four (hereinafter "the Class Members" or "the Class" or the "Texas Class"):

All consumer residents in Texas who own, owned, lease, or leased a 2015-2016 Cadillac Escalade, 2014-2016 Chevrolet Silverado 1500, 2015-2016 Chevrolet Suburban, 2015-2106 Chevrolet Tahoe, 2014-2016 GMC Sierra 1500, or 2015-2016 Yukon

Excluded from the Class are the following individuals or entities:

- a. Individuals or entities, if any, who timely opt out of this proceeding using the correct protocol for opting out that will be formally established by the Court:
- b. Any and all federal, state, or local governments, including, but not limited to, their departments, agencies, divisions, bureaus, boards, sections, groups, counsels, and/or subdivisions;
- c. Any currently sitting federal judge or magistrate in the current style and/or any persons within the third degree of consanguinity to such judge or justice;
- d. Any person who has given notice to the Defendant by service of civil suit and alleged he or she has suffered personal injury; and
  - e. Any person seeking punitive and/or exemplary damages.

The "Nationwide Class" for Count Five (hereinafter "the Class Members" or "the Class" or the "Nationwide Class"):

All consumer residents of the United States who own, owned, lease, or leased a 2015-2016 Cadillac Escalade, 2014-2016 Chevrolet Silverado 1500, 2015-2016 Chevrolet Suburban, 2015-2106 Chevrolet Tahoe, 2014-2016 GMC Sierra 1500, or 2015-2016 Yukon.

Excluded from the Class are the following individuals or entities:

- a. Individuals or entities, if any, who timely opt out of this proceeding using the correct protocol for opting out that will be formally established by the Court;
- b. Any and all federal, state, or local governments, including, but not limited to, their departments, agencies, divisions, bureaus, boards, sections, groups, counsels, and/or subdivisions;
- c. Any currently sitting federal judge or magistrate in the current style and/or any persons within the third degree of consanguinity to such judge or justice;
- d. Any person who has given notice to the Defendant by service of civil suit and alleged he or she has suffered personal injury; and
  - e. Any person seeking punitive and/or exemplary damages.

2. Defendant GENERAL MOTORS COMPANY is a foreign corporation whose principal place of business is in Detroit, Michigan. Defendant GM may be served through its registered agent for service: CT Corporation, 350 N. St. Paul St., Ste. 2900, Dallas, Texas 75201-0000. Defendant GM manufactured, distributed, sold, serviced and/or warranted the vehicles made the subject of this litigation, hereinafter referred to as the "Class Vehicles" for both Classes, which include: 2015-2016 Cadillac Escalade; 2014-2016 Chevrolet Silverado 1500; 2015-2016 Chevrolet Suburban; 2015-2016 Chevrolet Tahoe; 2014-2016 GMC Sierra 1500; and 2015-2016 Yukon. GM distributed, sold, serviced and/or warranted, directly or indirectly, hundreds, if not thousands, of Class Vehicles to Plaintiff and the Class Members with the understanding and expectation that those vehicles would be sold in, operate in, and be fit for their intended purpose and as warranted in Texas.

### **JURISDICTION AND VENUE**

- 3. Pursuant to 28 U.S.C. § 1332, this Court has original jurisdiction over the Plaintiff's and the Class Members' claims in that diversity of citizenship exists and Plaintiff seeks to represent a class of persons in a matter in controversy which exceeds the sum or value of \$5,000,000, exclusive of interest and costs.
- 4. This Court has general and specific jurisdiction over the Defendant, in that Defendant GM has sufficient minimum contacts with Texas and within the Eastern District of Texas to establish Defendant's presence in Texas, and certain material acts upon which this suit is based occurred within the Eastern District of Texas, to include but not limited to: (1) the sale of the Defendant's defective product to the Plaintiff, (2) one of the failed repairs, and (3) an occurrence of failure after the warranty failed its essential purpose.

5. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. 1391(b)(1-3) and (c) in that: (1) Defendant GM resides in the Eastern District of Texas because it is subject to personal jurisdiction within the Eastern District of Texas; (2) a substantial part of the events or omissions giving rise to the claims asserted herein occurred in this judicial district; and (3) Defendant may be found in this district.

### **FACTUAL NATURE OF THE SUIT**

### A. Plaintiff Purchases A Class Vehicle.

- 6. On or about December 18, 2014, Plaintiff purchased a new 2015 Chevrolet Suburban which was delivered to Plaintiff in Bowie County, Texas. Plaintiff executed all sales documents in Bowie County, Texas.
- 7. In early January of 2017, Plaintiff and his wife noticed the brakes on the Suburban were not functioning properly. More specifically, the brakes would seemingly function without incident the first three to four times when they were applied or tapped, but thereafter the brakes would become hard and resist depression or require an increased effort to depress the brake pedal but with no stopping ability.
- 8. In January of 2017, Plaintiff contacted the dealership from which he purchased the Suburban and informed the dealership of the very serious braking failure issue.

### B. Defendant GM Knowingly Sold Dangerously Defective Vehicles to Consumers.

9. The dealership was familiar with the problem because in February of 2015, Defendant GM had issued a service bulletin #PIT5361B which affected the Class Vehicles as of that date to include 2015 Cadillac Escalade; 2014 Chevrolet Silverado 1500; 2015 Chevrolet Suburban; 2015 Chevrolet Tahoe; 2014-2015 GMC Sierra 1500; and 2015 Yukon. *See* Exhibit A. GM expressly acknowledged that "a customer may comment on a hard brake pedal or that

increased effort is needed to depress the brake pedal." As evidence of the defect, Defendant GM notified its dealers, "While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line."

- 10. Ultimately, Defendant GM would issue a series of service bulletins to its dealers regarding the brake defect, with the latest bulletin dated March 15, 2017, and it included the following Class Vehicles and year models: 2015-2016 Cadillac Escalade; 2014-2016 Chevrolet Silverado 1500; 2015-2016 Chevrolet Suburban; 2015-2016 Chevrolet Tahoe; 2014-2016 GMC Sierra 1500; and 2015-2016 Yukon. *See* Exhibit A. As part of GM's overall strategy to engage in material omission and deception upon Plaintiff and the Class members, these bulletins contain false, misleading, or deceptive information about the potential for curing the defects because the purported repairs do not fix the defect and the statements are designed to mislead dealers and Class Vehicle owners.
- 11. Accordingly, Defendant GM was already aware of the defect prior to February of 2015, and yet it never informed Plaintiff or Class Members who had already purchased or leased a Class Vehicle. As of February 10, 2016, GM had verified some 19 affected vehicle models where the "CUSTOMER WILL NEED INCREASED EFFORT TO DEPRESS THE BRAKE PEDAL. TECHNICIAN MAY FIND FLUID IN THE BRAKE BOOSTER AND/OR THE BOOSTER LINE. TECHNICIAN WILL NEED TO REPLACE VACUUM PUMP, BRAKE BOOSTER, MASTER CYLINDER, VACUUM PUMP BELT AND VACUUM LINE BETWEEN THE BOOSTER AND THE PUMP." *See* Exhibit B. The 19 affected vehicles are the Class Vehicles which GM continued to sell without disclosure to the Class Members even after this admission.

- 12. Disturbingly, the number of customer complaints echoed what GM already knew about its defective brake system: the need for increased effort to depress brake pedal, high occurrences in stop and go traffic, high occurrences of failure at lower speeds, brake booster issue, replacement of brake booster, replacement of master cylinder, safety issue, etc. *See* Exhibit C.
- 13. Further, Defendant GM knowingly sold thousands of Class Vehicles following February 2015 to unsuspecting Class Members to whom GM said nothing about the braking defect.

### C. The Defendant's Braking Defect Cannot Be Remedied And Is Dangerous.

- 14. On or about January 31, 2017, the dealership picked up Plaintiff's vehicle in Texas and took it back to the dealership for repairs. The dealership informed Plaintiff that it had performed the repairs pursuant to Defendant GM's service bulletin. The Suburban was delivered back to Plaintiff in Bowie County, Texas on February 4, 2017.
- 15. On February 28, 2017, Plaintiff's wife, Samantha Harris, was driving the Suburban when the identical hard brake problem presented and the brake would not depress. A catastrophic failure of the brake occurred—after the purported fix—which caused the Plaintiff's Suburban driven by Mrs. Harris to crash with another vehicle.
- 16. On the same day, Plaintiff notified the dealership of the brake failure and the resulting accident. Plaintiff further informed the dealership of his apprehension of ever operating the vehicle again, and he made a demand that Defendant GM should be responsible for the vehicle. The dealership notified Defendant GM in writing of the brake failure, the accident, and Plaintiff's request that GM take responsibility for the vehicle. *See* Exhibit D. On or about March 8 and 9, 2017, Defendant GM notified the dealership that it should, "STOP ALL WORK ON THE VEHICLE!," take no further action, ask for the "product allegation department," that GM had

opened a case/claim file, and GM would assume the handling of Plaintiff's problem and concerns. *See* Exhibit D.

- 17. On or about March 13, 2017, Plaintiff's wife was contacted by a representative of Defendant GM who requested Defendant GM be allowed to inspect the vehicle and indicated to Plaintiff's wife that no work was to be performed on the vehicle. Defendant GM's inspection of the vehicle occurred on or about March 14, 2017, at an auto-repair facility in Texarkana, Texas, and lasted all day.
- 18. On or about March 22, 2017, Plaintiff's wife inquired of Defendant GM's representative, Pam Brown, about the status of the claim and about what Plaintiff and his wife were supposed to do with an inoperable car and the resulting lack of transportation with a substitute vehicle. Defendant GM's representative, Pam Brown, stated to Plaintiff's wife, "It is really not our problem."
- 19. On or about April 29, 2017, Plaintiff contacted the dealership and informed the dealership that Defendant GM was doing nothing to resolve the issue of Plaintiff's wrecked vehicle and resulting lack of transportation for his family due to brake failure. On or about May 1, 2017, multiple representatives from the dealership attempted to make contact with GM. *See* Exhibit D. They were unsuccessful. *Id*.
- 20. On May 2, 2017, Defendant GM contacted the dealership and instructed the dealership to obtain the vehicle and repair the brakes according to the Service Bulletin. *See* Exhibit D. The dealership personnel responded that they had previously performed the repairs according to the Service Bulletin in February 2017 and that they believed Defendant GM should send a field engineer to come and inspect the Suburban's brakes. *Id.* Defendant GM informed the dealership that *it had already sent a field engineer to inspect Plaintiff's brakes*, and that Defendant GM had

already determined the *brakes failed during the inspection*. *Id.* The dealership informed GM they would not perform any additional warranty repairs on Plaintiff's Suburban. *Id.* 

- 21. On or about May 2, 2017, and without Plaintiff's knowledge, Plaintiff learned that Defendant GM had directed that Plaintiff's Suburban be sent to a second dealership in Bowie County, Texarkana, Texas, to perform the brake repairs. Those repairs were purportedly performed pursuant to the Service Bulletin. However, Plaintiff was very concerned about the safety of the brakes and the vehicle.
- 22. On May 4, 2017, the first dealership formally notified Defendant GM in writing through legal counsel that it would forbear from performing any further repairs to Plaintiff's vehicle. The dealership further demanded that Defendant GM expeditiously resolve Plaintiff's problems with the Suburban.
- 23. On June 15, 2017, GM completely denied Plaintiff's claims and attempts to engage in a dialogue with GM. However, in its denial of all responsibility, Defendant GM continued with its "not our problem" philosophy and actually issued a warning to Plaintiff stating, "Please note that you have an obligation and responsibility to ensure that the subject vehicle and its related components are maintained and preserved in *their immediate post-incident condition for as long as there is intent to pursue a claim and/or cause of action.*" GM sent this warning even though it had already inspected the Suburban and found the brake to be defective, and GM knew the vehicle had subsequently been repaired again by the second dealership. Yet, Defendant GM literally warned Plaintiff to do nothing with the Suburban.
- 24. On June 16, 2017, Plaintiff attempted to back the Suburban and a boat trailer on a boat ramp to launch his boat. In the process, the Suburban's brakes failed again, and Plaintiff repeatedly pumped on the brake in an effort to avoid having the vehicle go into the lake. Finally,

the vehicle stopped. This brake failure occurred even after Defendant GM had the vehicle repaired a second time pursuant to its Service Bulletin and warranty.

25. Currently, Plaintiff's unsafe Suburban sits at his home, and because Defendant GM cannot or will not repair it, it is wholly unusable and without value.

### **CLASS ALLEGATIONS**

- 26. This action has been brought and may be properly maintained and certified as a Class Action because as to *each* of the proposed classes:
  - (a) The questions and issues of law or fact are of a common or general interest, affecting Class of individuals and the public at large;
  - (b) The Class consists of a sufficiently large group of individuals, believed to exceed 1,000 members, and is so large that it is impractical to join all members of the Class before the Court as individual plaintiffs. The identity of Class members is readily ascertainable from various sources including GM's ownership records, government ownership records, and/or via simple notice by publication;
  - (c) The questions of law or fact common to the Class are substantially similar and predominate over those questions affecting only specific members of the Class;
  - (d) The Class is united by a community of interest in obtaining appropriate equitable relief including injunctive relief, recall of Class Vehicles, restitution, damages, and other available relief designed to redress the wrongful conduct of Defendant GM;
  - (e) Plaintiff is a member of the Class and his claims are typical of the Class;
  - (f) Plaintiff will fairly and adequately represent the claims of the Class, and protect the interests of the Class without exercising personal interest or otherwise acting in a manner inconsistent with the best interests of the Class generally;
  - (g) Plaintiff retained attorneys experienced in the litigation of class and representative claims and in the area of consumer protection litigation who have agreed to and will responsibly and vigorously advocate on behalf of the Class as a whole;
  - (h) Without class certification, the prosecution of separate consumer actions by individual members of the Class would be impracticable and financially difficult, and create a risk of repetitive, inconsistent and varying adjudications. This would have the effect of establishing incompatible standards of conduct for GM,

discouraging the prosecution of meritorious but small claims, and/or result in adjudications which would be dispositive of the interests of other Class members not parties to the adjudication, or otherwise substantially impair the ability of Class members to protect their rights and interests;

- (i) Defendant GM acted or refused to act on grounds generally applicable to the Class, thereby making the award of equitable relief and/or restitution appropriate to the Class as a whole;
- (j) The class action procedure is superior to other methods of adjudication, and specifically designed to result in the fair, uniform and efficient adjudication of the claims presented by this complaint. This class action will facilitate judicial economy and preclude the undue financial, administrative and procedural burdens which would necessarily result from a multiplicity of individual actions.
- 27. Because the damages suffered by each Class member within the two classes are relatively small *compared to* the expense and burden of prosecuting this compelling case against a well-financed, multibillion dollar corporation, this class action is the only way each Class member can redress the harm that Defendant GM caused.
- 28. Should individual Class members be required to bring separate actions, Texas' courts or courts around the nation would face a multitude of lawsuits that would burden the court system and create a risk of inconsistent rulings and contradictory judgments. In contrast to proceeding on a case-by-case basis, in which inconsistent results will magnify the delay and expense to all parties and the court system, this class action presents far fewer management difficulties while providing unitary adjudication, economies of scale, and comprehensive supervision by a single court.

### **CAUSES OF ACTION**

## FIRST COUNT FOR RELIEF (Breach of Express Warranty)

29. Plaintiff, individually and for the Texas Class, hereby incorporates each and every allegation as though fully set forth herein.

- 30. For each Class Vehicle sold by Defendant GM, an express written warranty was issued that provided for the inclusion of operational "4-Wheel Antilock Disc Brakes" in the standard vehicle price. *See* Exhibit E.
- 31. GM has knowingly sold to Plaintiff and Texas Class Members the Class Vehicles with the defective braking system and of which GM was aware of the *irreparable* defect present in the Class Vehicles, creating a serious safety risk for the driver, the Class Vehicles' occupants, other drivers, and pedestrians.
- 32. Defendant GM breached its express warranty by offering for sale and selling defective vehicles that were by design and construction defective and unsafe, thereby subjecting the occupants of the Class Vehicles purchased or leased to damages and risks of loss and injury.
- 33. Defendant GM's breach of its express warranties proximately caused the Texas Class to suffer damages in excess of \$5,000,000.
- 34. Without limitation, GM's intentional delay and concealment of information regarding the brake defect from its dealers, prospective Class Vehicle purchasers, Texas Class Members, and Plaintiff, and its inability to remedy the defect through the Service Bulletins, all have caused any exclusive or limited remedy in the warranty to fail its essential purpose.
- 35. Any purported limitations of express warranties or remedies would be unconscionable because of Defendant's knowledge regarding the defects in Class Vehicles, Defendant's omission to the Texas Class Members about the defects and/or Defendant's intentional concealment of the defect, and the failure of GM to provide an adequate remedy.
- 36. Pursuant to Texas Civil Practice & Remedies Code §§ 38.001 and 38.002, Plaintiff is entitled to attorneys' fees on behalf of himself and for the Texas Class in that this matter involves an oral or written contract, Plaintiff and the Texas Class are represented by Counsel or

Counsel is being sought to represent the Texas Class, a claim was presented to GM, and GM has failed to pay the just amount owed within thirty (30) days after the claim was presented.

37. Plaintiff and the Texas Class seek full compensatory damages allowable by law, attorney's fees, costs, punitive damages, and appropriate equitable relief including injunctive relief, a declaratory judgment, a court order enjoining Defendant GM's wrongful acts and practices, restitution, the repair of all Class Vehicles, replacement of all Class Vehicles, the refund of money paid to own or lease all Class Vehicles, and any other relief to which Plaintiffs and the Texas Class may be entitled.

## SECOND COUNT FOR RELIEF (Breach of Implied Warranty)

- 38. Plaintiff, individually and for the Texas Class, hereby incorporates each and every allegation as though fully set forth herein.
- 39. Defendant GM impliedly warranted that the Class Vehicles, which it designed, manufactured, sold, or leased to Plaintiff and members of the Texas Class, were merchantable, fit and safe for their ordinary use, not otherwise injurious to consumers, and would come with adequate safety warnings.
- 40. Because the Class Vehicles are equipped with the defective braking system, the vehicle purchased or leased and used by Plaintiff and the Texas Class members is unsafe, unfit for use when sold, threatens injury to its occupants or others, and is not merchantable. Defendant GM breached the implied warranty of merchantability in the sale or lease of the Class Vehicles to Plaintiff and members of the Texas Class in that the vehicles were not fit for their ordinary purpose and not merchantable.

- 41. As a direct and proximate result of Defendant GM's breach of the implied warranty of merchantability and fitness for a particular purpose, Plaintiffs and members of the Texas Class suffered damages in excess of \$5,000,000.
- 42. GM has knowingly sold to Plaintiff and Texas Class Members the Class Vehicles of which it was aware of an irreparable defect present in the Class Vehicles, creating a serious safety risk for the driver, the Class Vehicles' occupants, other drivers, and pedestrians.
- 43. Without limitation, GM's intentional delay and concealment of information regarding the brake defect from its dealers, prospective Class Vehicle purchasers, Texas Class Members, and Plaintiff, and its inability to remedy the defect through the Service Bulletins, all have caused any exclusive or limited remedy in the warranty to fail its essential purpose.
- 44. Any purported limitations of warranties or remedies would be unconscionable because of Defendant's knowledge regarding the defects in Class Vehicles, Defendant's omission to the Texas Class Members about the defects and/or Defendant's intentional concealment of the defect, and the failure of GM to provide an adequate remedy.
- 45. Plaintiff and the Texas Class seek full compensatory damages allowable by law, attorney's fees, costs, punitive damages, and appropriate equitable relief including injunctive relief, a declaratory judgment, a court order enjoining Defendant GM's wrongful acts and practices, restitution, the repair of all Class Vehicles, replacement of all Class Vehicles, the refund of money paid to own or lease all Class Vehicles, and any other relief to which Plaintiffs and the Texas Class may be entitled.

## THIRD COUNT FOR RELIEF (Violations of the Texas Deceptive Trade Practices Act Toward The Class)

46. Plaintiff, individually and for the Texas Class, hereby incorporates each and every allegation as though fully set forth herein.

- 47. Defendant GM sold and continues to sell, and leased and continues to lease Class Vehicles notwithstanding its awareness of the defective braking system and of the danger posed by the defect. In doing so, Defendant GM makes false claims about its vehicles being defect free or omits material information about the known defect in the Class Vehicles. Defendant GM has furthered its scheme of unconscionable and deceptive acts of material omission by making false, deceptive, and misleading statements in its service bulletins about possible cures for the known defect. Defendant GM's acts constitute an unconscionable act or course of action; and a false, misleading, or deceptive act or practice in violation of Texas Business & Commerce Code § 17.46(a) & (b)(2), (5), (7), (9), (13) & (24).
- 48. Pursuant to Texas Business & Commerce Code § 17.50(b)(1), Plaintiff and the Texas Class are entitled to relief in the form of an award of economic damages found by the trier of fact, and which should be trebled based upon the Defendant's actions which were committed knowingly.
- 49. Pursuant to Texas Business & Commerce Code § 17.50(b)(2) and due to GM's continued sale of these vehicles and failure to make truthful disclosures, Plaintiff and the Texas Class are entitled to relief in the form of an order enjoining Defendant's deceptive acts.
- 50. Pursuant to Texas Business & Commerce Code § 17.50(b)(1), Plaintiff and the Texas Class are entitled to relief in the form of an order restoring the Plaintiff and the Texas Class members to their money which was acquired in violation of § 17.46(a) & (b)(2), (5), (7), (9), (13) & (24).
- 51. Pursuant to Texas Business & Commerce Code § 17.50(d), Plaintiff and the Texas Class are entitled to and award of court cost and reasonable attorneys' fees.

## FOURTH COUNT FOR RELIEF (Money Had And Received)

- 52. Plaintiff, individually and for the Texas Class, hereby incorporates each and every allegation as though fully set forth herein.
- 53. Plaintiff and the Texas Class paid monies for Class Vehicles which were not valued as charged because of the defect which Defendant GM intentionally concealed. By selling a defective vehicle or by failing to disclose the defect and selling Class Vehicles with knowledge of the defect, Defendant GM received and possessed money which rightfully belonged to Plaintiff and the Texas Class Members.
- 54. As a result of overcharging for defective vehicles, Defendant GM possessed(es) money which in equity and good conscience belongs to Plaintiff and Texas Class Members—thereby causing Plaintiff and the Texas Class damages.

## FIFTH CLAIM FOR RELIEF (Violation of the Magnuson-Moss Warranty Act, 15 U.S.C. §§ 2301, et seq.)

- 55. Plaintiffs, individually and for the National Class, hereby incorporate each and every allegation as though fully set forth herein.
- 56. For each Class Vehicle, Defendant GM issued an express written warranty that covered the vehicle, including but not limited to the braking system, and which warranted the vehicle to be free of defects in materials and workmanship at the time of delivery.
- 57. Defendant GM breached its express warranties by offering for sale and selling defective vehicles that were by design and construction defective and unsafe, thereby subjecting the occupants of the Class Vehicles purchased or leased to damages and risks of loss and injury.
- 58. Plaintiffs and members of the National Class are "consumers" within the meaning of the Magnuson-Moss Act, 15 U.S.C. § 2301(3).

- 59. Defendant GM is a "supplier" and "warrantor" within the meaning of the Magnuson-Moss Act, 15 U.S.C. § 2301(4) and (5).
- 60. The Class Vehicles at issue are "consumer products" within the meaning of the Magnuson-Moss Act, 15 U.S.C. § 2301(6).
- 61. Defendant GM's written and implied warranties relate to the future performance of its vehicles because it promised that the brakes of the Class Vehicles would perform adequately for a specified period of time or mileage, whichever came first.
- 62. Defendant GM has breached and continues to breach its written and implied warranties of future performance, thereby damaging Plaintiff and similarly situated National Class Members, when their Class Vehicles fail to perform as represented due to an undisclosed brake defect. Defendant GM fails to fully cover or pay for necessary inspections, repairs and/or vehicle replacements for Plaintiffs and the Class.
- 63. Without limitation, GM's intentional delay and concealment of information regarding the brake defect from its dealers, prospective Class Vehicle purchasers, National Class Members, and Plaintiff, and its inability to remedy the defect through the Service Bulletins, all have caused any exclusive or limited remedy in the warranty to fail its essential purpose.
- 64. Any purported limitations of warranties or remedies would be unconscionable because of Defendant's knowledge regarding the defects in Class Vehicles, Defendant's omission to the National Class Members about the defects and/or Defendant's intentional concealment of the defect, and the failure of GM to provide an adequate remedy.
- 65. Plaintiffs, members of the National Class, and the public will suffer irreparable harm if Defendant GM is not ordered to properly repair all of the Class Vehicle immediately, offer rescission to the National Class by repurchasing their Class Vehicles for their full cost, reimburse

the lessees of the Class Vehicles the monies they have paid toward their leases, recall all defective vehicles that are equipped with the defective brakes, and cease and desist from marketing, advertising, selling, and leasing the Class Vehicles.

- 66. Defendant GM is under a continuing duty to inform its customers of the nature and existence of potential defects in the vehicles sold.
- 67. Such irreparable harm includes but is not limited to likely injuries as a result of the defects to the Class Vehicles.
- 68. Plaintiff and the National Class seek full compensatory damages allowable by law, attorney's fees, costs, punitive damages, and appropriate equitable relief including injunctive relief, a declaratory judgment, a court order enjoining Defendant GM's wrongful acts and practices, restitution, the repair of all Class Vehicles, replacement of all Class Vehicles, the refund of money paid to own or lease all Class Vehicles, and any other relief to which Plaintiff and the National Class may be entitled

### **JURY DEMAND**

69. Plaintiff demands a jury trial on all issues so properly triable.

### **PRAYER**

- 70. WHEREFORE, PREMISES CONSIDERED, Plaintiff and Class Members within their respective Classes respectfully pray that the Court:
- (a) For each of the proposed Classes, certify this action as a class action as permitted by FED. R. CIV. P. Rule 23(b)(2) and (b)(3), appoint Plaintiff as class representative, and appoint Plaintiff's counsel as class counsel;
  - (c) Direct that notice be issued to the Class Members;

(b) Conduct a trial on the merits and, thereafter, enter judgment against GM in favor of Plaintiff and Class Members consistent with the damages amounts, restitution and/or other relief requested herein or for which Plaintiff and the Class may prove themselves entitled.

Respectfully submitted,

By: /s/ James C. Wyly
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### ATTORNEYS FOR PLAINTIFF

SB-10057667-3895



## Service Bulletin

File in Section:

Bulletin No.: PIT5361

Date: February, 2015

## PRELIMINARY INFORMATION

Subject: Diagnostic Tip - Additional Brake Pedal Effort

Models: 2015 Cadillac Escalade Models

2014 Chevrolet Silverado 1500

2015 Chevrolet Silverado 1500, Suburban, Tahoe

2014 GMC Sierra 1500

2015 GMC Sierra 1500, Yukon Models

The following diagnosis might be helpful if the vehicle exhibits the symptom(s) described in this PI.

### Condition/Concern

In some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

In some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

### Recommendation/Instructions

If engine oil is found, it is important the following parts are replaced. If not, the condition will return.

- 1. Vacuum Pump
- 2. Vacuum Line between the booster and the pump
- 3. Brake Booster
- 4. Master Cylinder

### **Parts Information**

Part Number	Description	Qty
12662552	PUMP ASM-VAC	1
23144638 (VYU) or 23135228 (w/ o VYU)	PIPE ASM-P/B BOOS VAC	1
23135220	BOOSTER ASM-P/B	1
20925765	CYLINDER-BRK MAS	1

### excel sheet

### **Warranty Information**

For vehicles repaired under warranty use:

Labor Operation	Description	Labor Time
2480118 *	Replace vacuum pump, vacuum pump to booster hose, vacuum brake booster, and brake master cylinder	2.8 hr
* This is a unique lab	or operation for bulletin use only. This will not be published in	the Labor Time Guide.

Please follow this diagnostic or repair process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

CM CM

Bulletin No.: PIT5361B Date: Jun-2016

## Service Bulletin

## PRELIMINARY INFORMATION

Subject: Diagnostic Tip - Additional Brake Pedal Effort

Models: 2015-2016 Cadillac Escalade Models

2014 Chevrolet Silverado 1500

2015-2016 Chevrolet Silverado 1500, Suburban, Tahoe

2014 GMC Sierra 1500

2015-2016 GMC Sierra 1500, Yukon Models

This PI was superseded to update the condition and parts list. Please discard PIT5361A.

The following diagnosis might be helpful if the vehicle exhibits the symptom(s) described in this PI.

### Condition/Concern

In some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. Also, in some cases a tick or ticking noise may be heard, which may sound like an exhaust manifold leak. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

Important: Pay close attention to the fluid and if it is determined to be engine oil, it could be coming from the vacuum pump. The vacuum pump is belt-driven and mounted to the side of the engine block. It is lubricated by pressurized engine oil.

### Recommendation/Instructions

If engine oil is found, it is important the following parts are replaced. If not, the condition will return.

- 1. Vacuum Pump
- 2. Vacuum Line between the booster and the pump
- 3. Brake Booster
- 4. Master Cylinder
- 5. Vacuum Pump Belt

### **Parts Information**

Part Number	Description	Qty
12669488	PUMP ASM-VAC	1
23144638 (VYU) or 23135228 (w/o VYU)	PIPE ASM-P/B BOOS VAC	1
23135220	BOOSTER ASM-P/B	1
20925765	CYLINDER-BRK MAS	1

1

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12658179	BELT - VAC PUMP	1	
12658178	BELT - A/C COMPRESSOR	1	

21

### **Warranty Information**

For vehicles repaired under warranty use:

Labor Operation	Description	Labor Time
2480118 *	Replace vacuum pump, belts, vacuum pump to booster hose, vacuum brake booster, and brake master cylinder	2.8 hr
	* This is a unique labor operation for bulletin use only.	

Please follow this diagnostic or repair process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

### Additional SI Keywords

C0299

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WE SUPPORT VOLUNTARY TECHNICIAN CERTIFICATION

2015 Chevrolet Suburban - 2WD [1GNSCKKC8FR500471]

Escalade, Escalade ESV, Suburban, Tahoe, Yukon, Yukon XL Service Manual 7527571 | View All Bulletins |

**Document ID: 4748532** 

# **#PIT5361C:** Diagnostic Tip - Additional Brake Pedal Effort - (Mar 15, 2017)

Subject: Diagnostic Tip - Additional Brake Pedal Effort



		Model	Year:	v	VIN: Engine: Transr		Transmission:
Brand:	Model:	from	to	from	to	2 Engine:	Transmission.
Cadillac	Escalade	2015-201	6	All	All	All	All
Chevrolet	Silverado 1500	2014-201	6	All	All	All	All
Chevrolet	Suburban	2015-201	6	All	All	All	All
Chevrolet	Tahoe	2015-201	6	All	All	All	All
GMC	Sierra 1500	2014-201	.6	All	All	All	All
GMC	Yukon	2015-201	.6	All	All	All	All

### **Supersession Statement**

This PI was superseded to update the parts list. Please discard PIT5361B.

You are about to leave the website of General Motors and view the content of an external website. That website is not owned or controlled by, or affiliated with General Motors or its subsidiaries, and it is subject to its separate terms and conditions and other agreements, as well as its privacy policies. The following diagnosis might be helpful if the vehicle exhibits the symptom(s) described in this PI. General Motors cannot be helpful if the vehicle exhibits the symptom(s) described in this PI.

### Condition/Concern Cancel

Warning some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. Also, in some cases a tick or ticking noise may be heard, which may sound like an exhaust manifold leak. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

Important: Pay close attention to the fluid and if it is determined to be engine oil, it could be coming from the vacuum pump. The vacuum pump is belt-driven and mounted to the side of the engine block. It is lubricated by pressurized engine oil.

### Recommendation/Instructions

If engine oil is found, it is important the following parts are replaced. If not, the condition will return.

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- 1. Vacuum Pump
- 2. Vacuum Line between the booster and the pump
- 3. Brake Booster
- 4. Master Cylinder

### **Parts Information**

Part Number	Description	Qty	
12669488	PUMP ASM-VAC	1	
23144638 (VYU) or 23135228 (w/o VYU)	PIPE ASM-P/B BOOS VAC	1	
23135220	BOOSTER ASM-P/B	1	···
20925765	CYLINDER-BRK MAS	1	

### Warranty Information

For vehicles repaired under warranty use:

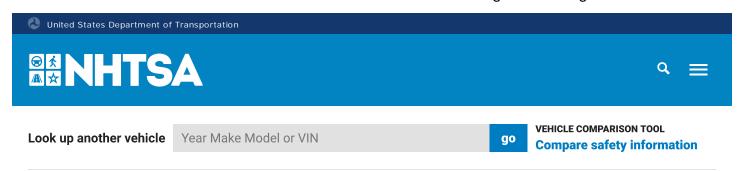
Labor Operation	Description	Labor Time
2480118 *	Replace vacuum pump, vacuum pump to booster hose, vacuum brake booster, and brake master cylinder	2.8 hr
* This is a unique labo		

Please follow this diagnostic or repair process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

GM bulletins are intended for use by professional technicians, NOT a "do-it-yourselfer". They are written to inform these technicians of conditions that may occur on some vehicles, or to provide information that could assist in the proper service of a vehicle. Properly trained technicians have the equipment, tools, safety instructions, and know-how to do a job properly and safety. If a condition is described, DO NOT assume that the bulletin applies to your vehicle, or that your vehicle will have that condition. See your GM dealer for information on whether your vehicle may benefit from the information.



Case 5:17-cv-00180 Document 1-2 Filed 10/23/17 Page 1 of 4 PageID #: 24



# 2015 CHEVROLET SUBURBAN 1500



7 INVESTIGATIONS 0
RECALLS COMPLAINTS 96



## Safety Ratings.

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1 of 7

COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

### 914 Manufacturer Communications

FILTER MANUFACTURER COMMUNICATIONS BY AFFECTED COMPONENTS

for 2015 CHEVROLET SUBURBAN 1500

All (914) AIR BAGS (2) BACK OVER PREVENTION (4) ELECTRICAL SYSTEM (271) ELECTRONIC STABILITY CONTROL (2) ENGINE (96)

ENGINE AND ENGINE COOLING (48) EQUIPMENT (346) EQUIPMENT ADAPTIVE (64) EXTERIOR LIGHTING (4)

FORWARD COLLISION AVOIDANCE (1) FUEL SYSTEM, DIESEL (1) FUEL SYSTEM, GASOLINE (26) FUEL SYSTEM, OTHER (16)

FUEL/PROPULSION SYSTEM (1) INTERIOR LIGHTING (1) LANE DEPARTURE (3) LATCHES/LOCKS/LINKAGES (5) PARKING BRAKE (4)

POWER TRAIN (56) SEAT BELTS (3) SEATS (23) SERVICE BRAKES (10) SERVICE BRAKES, AIR (4) SERVICE BRAKES, ELECTRIC (2)

SERVICE BRAKES, HYDRAULIC (10) STEERING (24) STRUCTURE (44) SUSPENSION (31) TIRES (15) TRACTION CONTROL SYSTEM (1)

TRAILER HITCHES (2) VEHICLE SPEED CONTROL (3) VISIBILITY (26) WHEELS (14)

March 14, 2017 MANUFACTURER COMMUNICATION NUMBER: PIT5509B

**Components: ELECTRICAL SYSTEM, SERVICE BRAKES** 



June 27, 2016 MANUFACTURER COMMUNICATION NUMBER: PIT5361B

**Components: SERVICE BRAKES** 

**NHTSA ID Number:** 10081053

**Manufacturer Communication Number: PIT5361B** 

### **Summary**

THIS PRELIMINARY INFORMATION COMMUNICATION PROVIDES INFORMATION TO THE TECHNICIAN ON THE STEPS TO DIAGNOSE AND REPAIR VEHICLES THAT MAY HAVE ISSUES WERE THE CUSTOMER WILL NEED INCREASED EFFORT TO DEPRESS THE BRAKE PEDAL. TECHNICIAN MAY FIND FLUID IN THE BRAKE BOOSTER AND/OR THE BOOSTER VACUUM LINE. TECHNICIAN WILL NEED TO REPLACE VACUUM PUMP, BRAKE BOOSTER, MASTER CYLINDER, VACUUM PUMP BELT AND THE VACUUM LINE BETWEEN THE BOOSTER AND THE PUMP.

14 Affected Products -

### **Vehicles**

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015-2016

### Case 5:17-cv-00180 Document 1-2 Filed 10/23/17 Page 3 of 4 PageID #: 26

CHEVROLET	SILVERADO 1500	2014-2016	
CHEVROLET	SUBURBAN	2015-2016	
CHEVROLET	TAHOE	2015-2016	
GMC	SIERRA 1500	2014-2016	
GMC	YUKON	2015-2016	
1 Associated Documen	ıt 🗻		
Service Bulletin Docum	ent		
<u> </u> SB-10081053-2280.	<b>.pdf</b> 95.829KB		
February 15, 2016 ма	NUFACTURER COMMUNICATION NUMBER: PIT5377D		$\oplus$
February 15, 2016 ма	NUFACTURER COMMUNICATION NUMBER: PIT5377D		$\oplus$
February 15, 2016 MA  Components: SER  February 10, 2016 MA	NUFACTURER COMMUNICATION NUMBER: PIT5377D VICE BRAKES  NUFACTURER COMMUNICATION NUMBER: PIT5361A		$\oplus$
February 15, 2016 MA  Components: SER  February 10, 2016 MA  Components: SER	NUFACTURER COMMUNICATION NUMBER: PIT5377D VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5361A VICE BRAKES		$\oplus$
February 15, 2016 MA  Components: SER  February 10, 2016 MA  Components: SER  NHTSA ID Number: 100	NUFACTURER COMMUNICATION NUMBER: PIT5377D VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5361A VICE BRAKES		$\oplus$
February 10, 2016 MA Components: SER' NHTSA ID Number: 100 Manufacturer Commun	NUFACTURER COMMUNICATION NUMBER: PIT5377D VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5361A VICE BRAKES  096208		$\oplus$
February 15, 2016 MA Components: SER'  February 10, 2016 MA Components: SER'  NHTSA ID Number: 100 Manufacturer Commun Summary  THIS PRELIMINARY INF TO DIAGNOSE AND REF TO DEPRESS THE BRAK VACUUM LINE. TECHNI	NUFACTURER COMMUNICATION NUMBER: PIT5377D VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5361A VICE BRAKES  096208	RE THE CUSTOMER WILL NEED INCREAS THE BRAKE BOOSTER AND/OR THE BOO MP, BRAKE BOOSTER, MASTER CYLINDER	SED EFFORT STER
February 15, 2016 MA Components: SER'  February 10, 2016 MA Components: SER'  NHTSA ID Number: 100 Manufacturer Commun  Summary  THIS PRELIMINARY INF TO DIAGNOSE AND REF TO DEPRESS THE BRAF VACUUM LINE. TECHNI PUMP BELT AND THE V	VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5377D  VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5361A  VICE BRAKES  D96208  DECEMBER OF PIT5361A  FORMATION COMMUNICATION PROVIDES III  PAIR VEHICLES THAT MAY HAVE ISSUES WITH VEHICLES THAT MAY HAVE ISSUES WITH VEHICLES THAT MAY FIND FLUID IN ICIAN WILL NEED TO REPLACE VACUUM PUT/ACUUM LINE BETWEEN THE BOOSTER ANIF	RE THE CUSTOMER WILL NEED INCREAS THE BRAKE BOOSTER AND/OR THE BOO MP, BRAKE BOOSTER, MASTER CYLINDER	SED EFFORT STER
February 15, 2016 MA Components: SER'  February 10, 2016 MA Components: SER'  NHTSA ID Number: 100 Manufacturer Commun Summary  THIS PRELIMINARY INF TO DIAGNOSE AND REF TO DEPRESS THE BRAK VACUUM LINE. TECHNI	VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5377D  VICE BRAKES  ANUFACTURER COMMUNICATION NUMBER: PIT5361A  VICE BRAKES  D96208  DECEMBER OF PIT5361A  FORMATION COMMUNICATION PROVIDES III  PAIR VEHICLES THAT MAY HAVE ISSUES WITH VEHICLES THAT MAY HAVE ISSUES WITH VEHICLES THAT MAY FIND FLUID IN ICIAN WILL NEED TO REPLACE VACUUM PUT/ACUUM LINE BETWEEN THE BOOSTER ANIF	RE THE CUSTOMER WILL NEED INCREAS THE BRAKE BOOSTER AND/OR THE BOO MP, BRAKE BOOSTER, MASTER CYLINDER	SED EFFORT STER

5 of 7

### Case 5:17-cv-00180 Document 1-2 Filed 10/23/17 Page 4 of 4 PageID #: 27

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015-2016
CADILLAC	ESCALADE ESV	2015-2016
CHEVROLET	SILVERADO 1500	2014-2016
CHEVROLET	SUBURBAN	2014-2016
CHEVROLET	TAHOE	2015-2016
GMC	SIERRA 1500	2014-2016
GMC	YUKON	2015-2016
GMC	YUKON XL	2015-2016
Request Research (Services fee	s apply)	
November 10, 2015 MANUFACTURE		$\oplus$
Components: SERVICE BRA	KES, ELECTRICAL SYSTEM	
← prev	Page 1 of 2	next →

**Recently Searched** 

2015 CHEVROLET SUBURBAN 1500

**SUV RWD** 

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 1 of 35 PageID #: 28



## 2015 **CADILLAC ESCALADE ESV**



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**RECALLS** 

INVESTIGATIONS 0 **COMPLAINTS** 

16

Not been rated

**OVERALL SAFETY RATING** 

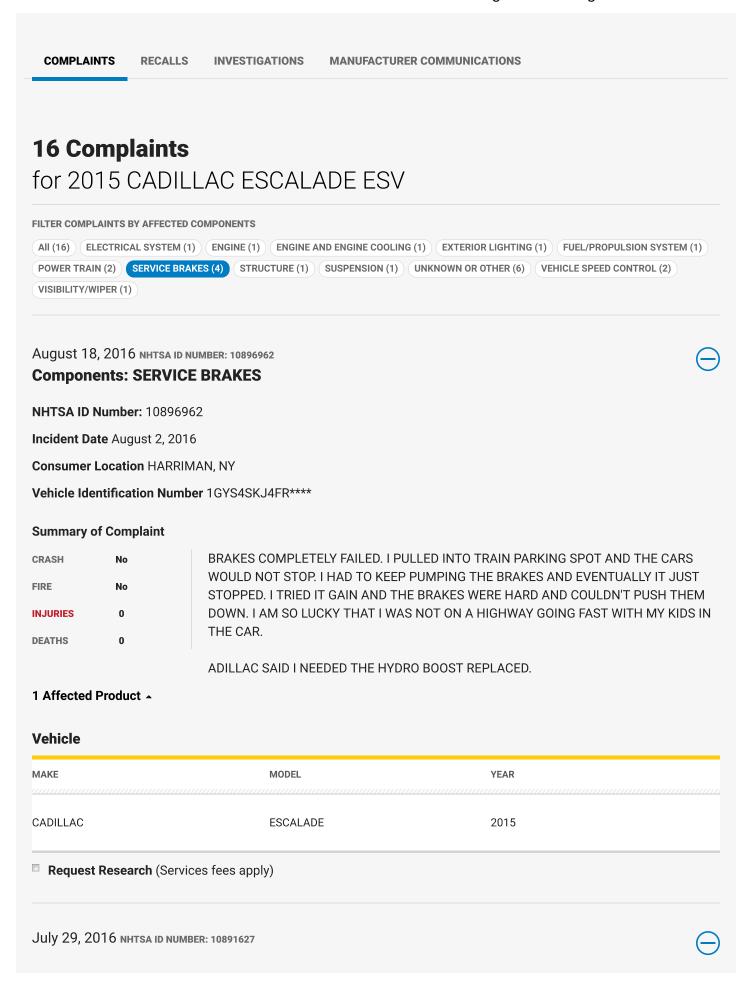
## Safety Ratings.

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10/18/2017, 3:34 PM 1 of 8

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 2 of 35 PageID #: 29



Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 3 of 35 PageID #: 30

### **Components: SERVICE BRAKES**

**NHTSA ID Number:** 10891627

**Incident Date** June 18, 2016

Consumer Location PHOENIX, AZ

Vehicle Identification Number 1GYS4PKJ8FR\*\*\*\*

### **Summary of Complaint**

CRASH	No	
FIRE	No	
INJURIES	0	
DEATHS	0	

AT 15000 MILES AND ORIGINAL OWNER WHILE TOWING OUR BRAKES COMPLETELY GAVE OUT. NO WARNING SIGN, NO LEAKAGE, ONLY 1 SYMPTOM A FEW MONTHS PRIOR WHERE THE BRAKE PEDDLE WAS MUSHY. DEALERSHIP SAID IT WAS FINE. EVERYTHING WORKED FINE DRIVING IT THROUGHOUT DAY. STOPPED FOR DINNER JUST BEFORE WE ENTERED MOUNTAIN PASS. GOT IN SUV TO LEAVE FOR HOME AND HAD NO BRAKES AT ALL. EMERGENCY BRAKE WON'T EVEN KICK IN TO BE USED FOR EMERGENCIES. THE VEHICLE GAVE NO WARNING SIGNS, ENGINE OR BRAKE LIGHT WARNINGS. NO CHANGES IN BRAKE PRESSURE, NO LEAKS UNDER VEHICLE OR ON ENGINE. IT WAS AN INSTANT GIVE OUT OF BRAKES AND COULD HAVE HAPPENED WHILE DRIVING. FORTUNATELY THEY DID NOT GIVE OUT WHILE MOVING MORE THAN 3 MPH SO WE ARE STILL ALIVE. DEALERSHIP AND GM BOTH SAID IT WAS NORMAL FOR BRAKES TO GIVE OUT AND NOT HAVE ANY BRAKES WHEN THE BRAKE MASTER CYLINDER GIVES OUT. THIS IS NOT NORMAL! THEY REPLACED THE MASTER CYLINDER AND ALL WORKS FINE NOW. HOWEVER I FEEL THIS IS A MAJOR VEHICLE SAFETY ISSUE IN THAT FOR A VEHICLE TO COMPLETELY LOSE ALL OF IT'S BRAKING ABILITY BUT NOT BE PREWARNED THAT THERE IS A PROBLEM IS EXTREMELY DANGEROUS. IF WE DIDN'T STOP FOR DINNER THE BRAKES WOULD HAVE GIVEN OUT IN THE MOUNTAIN PASS AND ME AND MY FAMILY WOULD MORE THAN LIKELY BE DEAD AT THE BOTTOM OF A MOUNTAIN CLIFF! WE ARE EXTREMELY AFRAID TO DRIVE THIS VEHICLE NOW AND GM HAS NO INTEREST IN BUYING IT BACK OR HELPING US GET OUT OF IT. THEY JUST SAID "JUST WAIT TO SEE IF IT HAPPENS AGAIN" WHICH TO ME, MEANS, WAIT UNTIL YOU CAUSE A FATALITY. THEY ALSO SAID THIS ISN'T HAPPENING TO OTHER GM VEHICLES.

### 1 Affected Product -

### **Vehicle**

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015

Request Research (Services fees apply)

March 31, 2016 NHTSA ID NUMBER: 10852756

**Components: SERVICE BRAKES** 

NHTSA ID Number: 10852756

Incident Date November 13, 2015

### Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 4 of 35 PageID #: 31

### Consumer Location ANAHEIM, CA

Vehicle Identification Number 1GYS4NKJ7FR\*\*\*\*

### **Summary of Complaint**

CRASH	No	
FIRE	No	
INJURIES	0	
DEATHS	0	

THE VEHICLE HAD VIRTUALLY NO BRAKES TO STOP IT AND 11,215 MILES. GENERAL MOTORS ALREADY HAD SERVICE WARNINGS OUT TO DEALERS DATED 7/17/2015, GM DOCUMENT ID #4242788. THEY SAY THEY REPLACED PADS AND ROTORS. AT 23,589 MILES THE VEHICLE NEEDED BRAKES AGAIN. SERVICE MANAGER TELLS US THAT THIS IS A KNOWN PROBLEM AT GENERAL MOTORS. THEY HAVE EVEN ISSUED A NEW WARNING FOR 2016 MODELS. I CONSIDER THE VEHICLE TO BE UNSAFE TO DRIVE IN

THAT THE BRAKES CAN GO OUT WITHOUT ANY WARNING.

### 1 Affected Product A

### **Vehicle**

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015

Request Research (Services fees apply)

November 23, 2015 NHTSA ID NUMBER: 10795343

Components: SERVICE BRAKES, SUSPENSION, POWER TRAIN



### **Recently Searched**

### 2015 **CADILLAC ESCALADE ESV**

**SUV AWD** 

Not been rated **OVERALL SAFETY RATING** 



### 2016

10/18/2017, 3:34 PM 6 of 8

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 5 of 35 PageID #: 32



# 2015 CHEVROLET SUBURBAN 1500



7 INVESTIGATIONS 0
RECALLS COMPLAINTS 96



## Safety Ratings.

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COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

## **96 Complaints**

## for 2015 CHEVROLET SUBURBAN 1500

FILTER COMPLAINTS BY AFFECTED COMPONENTS

All (96) AIR BAGS (5) ELECTRICAL SYSTEM (12) ELECTRONIC STABILITY CONTROL (3) ENGINE (10) EQUIPMENT (1)

EQUIPMENT ADAPTIVE (2) EXTERIOR LIGHTING (4) FUEL/PROPULSION SYSTEM (6) POWER TRAIN (11) SEAT BELTS (1) SERVICE BRAKES (18) STEERING (12) STRUCTURE (13) SUSPENSION (6) TIRES (1) UNKNOWN OR OTHER (20)

VEHICLE SPEED CONTROL (1) VISIBILITY (2) VISIBILITY/WIPER (2) WHEELS (3)

October 1, 2017 NHTSA ID NUMBER: 11030722

### **Components: SERVICE BRAKES**

**NHTSA ID Number:** 11030722

Incident Date June 29, 2017

Consumer Location LAC DU FLAMBEAU, WI

Vehicle Identification Number 1GNSKKKC7FR\*\*\*\*

### **Summary of Complaint**

CRASH	Yes
FIRE	No
INJURIES	3
DEATHS	0

WHILE DRIVING ON 190 IN STOP AND GO TRAFFIC, THE CAR IN FRONT OF ME STOPPED. I APPLIED MY BRAKES AND THE PEDAL WAS HARD AND WOULD NOT DEPRESS. AS A RESULT MY CAR WOULD NOT STOP AND I HIT THE CAR IN FRONT OF ME IN THE REAR END. MY AIR BAGS WENT OFF. I RECEIVED AN AIR BAG BURN. THE CAR IN FRONT OF ME STRUCK THE CAR IN FRONT OF HIM. BOTH OTHER DRIVERS CLAIM THEY WERE INJURED. MY CAR COST \$15,300 TO REPAIR. CHEVROLET IS AWARE OF THIS PROBLEM, ISSUING PRELIMINARY SERVICE BULLETIN PIT5361 IN 2015, ADDENDUM B IN 2016 AND ADDENDUM B IN 2017. THE PROBLEM IS A FAULTY VACUUM PUMP, MASTER CYLINDER, BRAKE BOOSTER, VACUUM LINE, AND VACUUM PUMP BELT. I WAS NEVER INFORMED OF THIS PROBLEM. I HAVE BEEN DRIVING 50 YEARS AND THIS IS MY FIRST CHARGEABLE ACCIDENT.

### 1 Affected Product -

### **Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

### Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 7 of 35 PageID #: 34

Request Research (Services fees apply) September 26, 2017 NHTSA ID NUMBER: 11030016 **Components: SERVICE BRAKES NHTSA ID Number:** 11030016 Incident Date September 26, 2017 Consumer Location LLANO, TX Vehicle Identification Number 1GNSCKKC7FR\*\*\*\* **Summary of Complaint CRASH** TL\* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE EXITING THE No PARKING LOT AT 5 MPH, THE BRAKES FAILED TO WORK WITHOUT WARNING. THE **FIRE** CONTACT HAD TO CHANGE THE GEAR TO PARK IN ORDER TO STOP THE VEHICLE. THE VEHICLE WAS TOWED TO THE DEALER (BOB PRICE CHEVROLET BUICK GMC, 1225 S **INJURIES** 0 STATE HWY 16, FREDERICKSBURG, TX 78624) WHERE IT WAS DIAGNOSED THAT THE **DEATHS** BRAKE BOOSTER AND THE BRAKE PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 51,800. 1 Affected Product A **Vehicle** MAKE MODEL **YEAR** CHEVROLET **SUBURBAN** 2015 Request Research (Services fees apply) August 28, 2017 NHTSA ID NUMBER: 11020065 **Components: SERVICE BRAKES NHTSA ID Number:** 11020065 Incident Date August 18, 2017 Consumer Location CENTERVILLE, MA Vehicle Identification Number 1GNSKKKC0FR\*\*\*\* **Summary of Complaint** CRASH THE BRAKES ON MY 2015 CHEVY SUBURBAN ARE LOCKING WHEN DRIVING A LOW No SPEED. THE PROBLEM STARTED ALL OF THE SUDDEN WHILE DRIVING UNDER DRY ROAD FIRE No CONDITIONS ON A CITY STREET. IF YOU PRESS ON THE BRAKE PEDAL, IT DOES NOT MOVE AND THE CAR DOES NOT STOPPED. I ALMOST HIT A FAMILY OF 4 THAT WAS **INJURIES** 0

## Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 8 of 35 PageID #: 35

DEATHS	0	CROSSING IN FRONT OF ME. THE CAR HAS BEEN AT DICK BEARD CHEVROLET IN HYANNIS, MA AND THEY ARE SAYING THAT THERE IS NO ISSUE WITH THE BRAKES AND AVOIDING SOLVING THE PROBLEM. I'VE CALLED CHEVROLET 4 TIMES AND THEY ARE NOT CALLING ME BACK. THE CAR IS NOT SAFE TO DRIVE AT ALL.		
1 Affected	Product •			
Vehicle				
MAKE		MODEL	YEAR	
CHEVROLET		SUBURBAN	2015	
□ Request	: <b>Research</b> (Ser	vices fees apply)		
	2017 NHTSA ID NI ents: SERVI	UMBER: 10995718 CE BRAKES		$\ominus$
NHTSA ID	<b>Number:</b> 10995	5718		
Incident Da	<b>ate</b> June 17, 20	17		
Consumer	<b>Location</b> MCQl	UEENEY, TX		
Vehicle Ide	entification Nun	nber 1GNSCJKC3FR****		
Summary of	of Complaint			
CRASH	No	BRAKE BOOSTER WENT OUT WHII	E DRIVING WITH MY CHILDREN IN THI	E CAR!
FIRE	No			
INJURIES	0			
DEATHS	0			
1 Affected	Product -			
Vehicle				
MAKE		MODEL	YEAR	
CHEVROLET		SUBURBAN	2015	
□ Request	: <b>Research</b> (Ser	vices fees apply)		
	2017 NHTSAID NI ents: SERVI	UMBER: 10995134 CE BRAKES		$\ominus$

### Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 9 of 35 PageID #: 36

**NHTSA ID Number:** 10995134

Incident Date October 14, 2016

Consumer Location GAINESVILLE, FL

Vehicle Identification Number 1GNSCJKC4FR\*\*\*\*

### **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

BRAKES STOPPED WORKING . FIRST TIME IT HAPPENED I THOUGHT IT WAS MY IMAGINATION AS I WAS IN A PARKING LOT GOING EXTREMELY SLOW. NEXT DAY IT HAPPENED WHEN BACKING OUT OF MY DRIVEWAY. HAD TO PRESS BRAKES EXTREMELY HARD AND IT ROLLED TO A STOP AS IT HIT CURB ON OTHER SIDE OF ROAD. TOOK IT TO DEALER AND THEY REPLACE THE VACUUM BOOSTER WHICH HAD FAILED AT APROX. 50,000 MILES. NOT COVERED UNDER WARRANTY. EVERY OTHER PART OF BRAKES BESIDES NORMAL WEAR AND TEAR IS COVERED. I WAS LUCKY IT HAPPENED IN MY DRIVEWAY AND NOT WHILE DRIVING AT HIGHER SPEEDS IN TRAFFIC.

I HAVE ADDITIONAL COMPLAINTS ABOUT THIS VEHICHLE. THE CLIPS HOLDING DRIVERS SEAT HAD TO BE REPLACED AT 40,000 MILES BECAUSE SEAT WAS SLIDING FROM SIDE TO SIDE. THEY ARE ALL READY LOOSE AGAIN AT 60,000 MILES ALTHOUGH NOT AS BAD AS FIRST TIME. MY AC CONDENSER WENT OUT AT 62,000 MILES. IT HAS BEEN ON NATIONAL BACKORDER FOR 7 WEEKS AND I AM STILL WAITING. THE CAR SHAKES ON THE INTERSTATE AT APROX 70 -75 MILES PER HOUR. THE DEALERSHIP HAS BALANCED THE TIRES AND THIS HAS NOT FIXED PROBLEM. AFTER DRIVING ON INTERSTATE AT HIGH SPEEDS FOR EXTENDED PERIOD OF TIME, WHEN STOPPING THE CAR IDLES VERY ROUGH AND HAS EVEN CUT OFF. THE DEALERSHIP RAN A FUEL INDUCTION SERVICE. WILL SEE IF IT WORKS WHEN I GET IT BACK AFTER THEY REPLACE AC CONDENSER. THE CAR SHIFTS HORRIBLY, ESPECIALLY WHEN GOING SLOW. WAS TOLD THAT IS A PROBLEM WITH THE FUEL EFFICIENT SHIFTING AND THERE IS NO REPAIR...JUST TO MANUALLY SHIFT. ALSO, THE HOOD OF THE CAR HAS TINY RUST SPOTS COMING THROUGH THE PAINT ALL OVER IT.

### 1 Affected Product -

### **Vehicle**

MAKE	MODEL	YEAR	
CHEVROLET	SUBURBAN	2015	
Request Research (Se	ervices fees apply)		
Request Research (Se	тугоез теез арргуу		
← prev	Page 1 of 4		next →

### **Recently Searched**

COMPLAI	NTS RECALLS	INVESTIGATIONS	MANUFACTUR	ER COMMUNICATIONS	
06 Ca	mplainta				
_	mplaints			E00	
101 20	13 CHEVI	ROLET SUBL	JKDAN I	300 	
All (96) AI	ADAPTIVE (2) EXTE	RICAL SYSTEM (12) ELECT	RONIC STABILITY C		
		ISIBILITY (2) VISIBILITY/V			
•	2017 NHTSA ID NUM				
Compon	ents: SERVICI	E BRAKES, ENGIN	E, VEHICLE S	SPEED CONTROL	
NHTSA ID I	<b>Number:</b> 1097154	49			
Incident Da	<b>ate</b> April 8, 2017				
Consumer	Location LORTON	N, VA			
Vehicle Ide	entification Numb	er 1GNSKJKCXFR****			
Summary o	of Complaint				
CRASH	No			S ARE NOT RESPONDING. I PUT IN N	
FIRE	No	MONTHS AGO AND BRAKES NOT RESPONDING? MY CAR ALMOST WENT DOWN THE HILL. I CALLED ROADSIDE ASSISTANCE AND HAD THEM TOWED MY CAR TO			
INJURIES	0			SUE VACUUM PUMP BROKE. ALSO I	
DEATHS	0	I CAN'T CONTROL I THEY WON'T REPA	MY SPEED AND IR THIS ISSUE B	NCE 2 MONTHS. THEY STILL HAVEN ENGINE GIVES A KICK WHEN ENTEI ECAUSE THEIR "MECHANICS" CANI LE TO DRIVE ANDUNSAFE FOR DRIV	RING HIGHWAY. NOT FIND THE
1 Affected	Product •				
Vehicle					
MAKE		MODEL		YEAR	
CHEVROLET		SUBURBA	.N	2015	
□ Request	t <b>Research</b> (Servic	ces fees apply)			
7	2222311 (23111)				

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 11 of 35 PageID #: 38

February 28, 2017 NHTSA ID NUMBER: 10957711

**Components: SERVICE BRAKES** 

NHTSA ID Number: 10957711 Incident Date February 28, 2017

**Consumer Location TEXARKANA, TX** 

Vehicle Identification Number 1GNSCKKC8FR\*\*\*\*

# **Summary of Complaint**

CRASH	Yes
FIRE	No
INJURIES	2
DEATHS	0

WHILE DRIVING HER VEHICLE TODAY MY WIFE DEPRESSED HER BRAKE TO STOP AND SHE SAID THE BRAKE FELT LIKE PUSHING ON A RUBBER TIRE. THE CAR WOULD NOT STOP CAUSING HER TO RUN A STOP SIGN AND HIT ANOTHER VEHICLE. WE HAD THE SAME PROBLEM LAST MONTH AND THE VEHICLE WAS TAKEN TO THE CHEVROLET DEALERSHIP AND "REPAIRED" ACCORDING TO THE CURRENT SAFETY BULLETIN ISSUED BY CHEVROLET. THIS COLLISION CAUSED THE OTHER PERSON TO GO TO THE HOSPITAL VIA EMS AND MY WIFE WAS TAKEN BY POV TO ER FOR EVALUATION. OBVIOUSLY WHATEVER "FIX" WAS DONE BY THE DEALERSHIP WAS NOT THE CAUSE OF THE PROBLEM. I WAS TOLD THE VACUUM ASSIST PUMP AND HOSES WERE REPLACED, BUT THE VEHICLE STILL HAD THE SAME ISSUE.

### 1 Affected Product A

# **Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

Request Research (Services fees apply)

February 23, 2017 NHTSA ID NUMBER: 10956664

# Components: SERVICE BRAKES, ELECTRONIC STABILITY CONTROL, SUSPENSION



**NHTSA ID Number:** 10956664 Incident Date January 15, 2016

Consumer Location COVINA, CA

Vehicle Identification Number 1GNSCKKC4FR\*\*\*\*

# **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

CAR ONLY HAS 60,000 MILES BRAKE BOOSTER IS GOING OUT AND CHEVY KNOWS THERE IS A PROBLEM BUT HAVE NOT RECALLED. ALSO FRONT SHOCKS ARE GOING OUT DUE TO MAGNETIC RIDE SYSTEM LOTS OF PEOPLE HAVE THE SAME PROBLEM CHEVY ONCE AGAIN HAS NOT RECALLED!

10/18/2017, 3:18 PM 5 of 8

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 12 of 35 PageID #: 39

Wehicle  MAKE MODEL YEAR  CHEVROLET SUBURBAN 2015  Request Research (Services fees apply)  November 28, 2016 NHTSA ID NUMBER: 10928435  Components: SERVICE BRAKES  NHTSA ID Number: 10928435  Incident Date November 28, 2016  Consumer Location HARVEY, LA  Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR FIRE No CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  NJURIES 0  DEATHS 0  1 Affected Product →  Vehicle  MAKE MODEL YEAR  CHEVROLET SUBURBAN 2015	
Request Research (Services fees apply)  November 28, 2016 NHTSA ID NUMBER: 10928435  Components: SERVICE BRAKES  NHTSA ID Number: 10928435  Incident Date November 28, 2016  Consumer Location HARVEY, LA  Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  1 Affected Product -  Vehicle  MAKE MODEL YEAR	
Request Research (Services fees apply)  November 28, 2016 NHTSA ID NUMBER: 10928435  Components: SERVICE BRAKES  NHTSA ID Number: 10928435  Incident Date November 28, 2016  Consumer Location HARVEY, LA  Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product A  Vehicle  MAKE MODEL YEAR	
November 28, 2016 NHTSA ID NUMBER: 10928435  Components: SERVICE BRAKES  NHTSA ID Number: 10928435  Incident Date November 28, 2016  Consumer Location HARVEY, LA  Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product •  Vehicle  MAKE MODEL YEAR	
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Incident Date November 28, 2016  Consumer Location HARVEY, LA  Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product A  Vehicle  MAKE MODEL YEAR	Е
Consumer Location HARVEY, LA  Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product A  Vehicle  MAKE MODEL YEAR	
Vehicle Identification Number IGNSCIKC6FR****  Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product •  Wehicle  MAKE MODEL YEAR	
Summary of Complaint  CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PR CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product ~  Vehicle  MAKE MODEL YEAR	
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ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.  INJURIES 0  DEATHS 0  1 Affected Product   Whicle  MAKE  MODEL  YEAR	ESS AND THE
INJURIES 0 DEATHS 0  1 Affected Product   Vehicle  MAKE MODEL YEAR	ROTOR AND
1 Affected Product •  Vehicle  MAKE MODEL YEAR	
Vehicle  MAKE MODEL YEAR	
MAKE MODEL YEAR	
CHEVROLET SUBURBAN 2015	
Request Research (Services fees apply)	
October 3, 2016 NHTSA ID NUMBER: 10911185	
Components: SERVICE BRAKES	
NHTSA ID Number: 10911185	
Incident Date October 1, 2016	
Consumer Location BOCA RATON, FL	

6 of 8

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 13 of 35 PageID #: 40

	entification Nu	mber 1GNSCJKC8FR****		
CRASH	No	TL* THE CONTACT OWNS A 2015	CHEVROLET SUBURBAN. THE CO	NTACT STATED THAT
FIRE	No	WHILE DRIVING AT 60 MPH, THE BRAKE PEDAL WAS DEPRESSED AND THE VEHICLE HESITATED TO REDUCE IN SPEED. THE VEHICLE WAS TOWED TO THE DEALER WHERE I'WAS DIAGNOSED THAT THE BRAKE BOOSTER FAILED. THE VEHICLE WAS NOT		
INJURIES	0			
DEATHS	0	REPAIRED. THE FAILURE MILEAGE WAS 67,000.		
MAKE		MODEL	YEAR	
CHEVROLET		SUBURBAN		<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>
□ Request	<b>t Research</b> (Se	ervices fees apply)		

# **Recently Searched**

# 2015 CHEVROLET SUBURBAN 1500

**SUV RWD** 





OEVEX IMAGES

7 of 8

COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

# **96 Complaints**

# for 2015 CHEVROLET SUBURBAN 1500

All (96) AIR BAGS (5) ELECTRICAL SYSTEM (12) ELECTRONIC STABILITY CONTROL (3) ENGINE (10) EQUIPMENT (1)

EQUIPMENT ADAPTIVE (2) EXTERIOR LIGHTING (4) FUEL/PROPULSION SYSTEM (6) POWER TRAIN (11) SEAT BELTS (1) SEATS (4)

SERVICE BRAKES (18) STEERING (12) STRUCTURE (13) SUSPENSION (6) TIRES (1) UNKNOWN OR OTHER (20)

VEHICLE SPEED CONTROL (1) VISIBILITY (2) VISIBILITY/WIPER (2) WHEELS (3)

September 8, 2016 NHTSA ID NUMBER: 10904757

# **Components: SERVICE BRAKES**

**NHTSA ID Number:** 10904757

Incident Date September 7, 2016

Consumer Location BROCKTON, MA

Vehicle Identification Number 1GNSKHKC7FR\*\*\*\*

## **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

I AM WRITING ABOUT MY 2015 CHEVY SUBURBAN. I OWN A LIMOUSINE SERVICE AND USE THE SUBURBAN IN MY FLEET. YESTERDAY A DRIVER, WITH PASSENGERS, HAD A TOTAL FAILURE OF THE POWER BRAKING SYSTEM. IT IS AT A LOCAL REPAIR SHOP NOW, AND I AM BEING TOLD THE AIR PUMP HAD BROKEN APART, INSIDE, SNAPPED THE FAN BELT RESULTING IN NO VACUUM GETTING TO THE POWER BRAKE SYSTEM. MY DRIVER WAS BARELY ABLE TO STOP THE VEHICLE BEFORE REAR ENDING ANOTHER CAR ON THE HIGHWAY. THE VEHICLE HAS 54,000 MILES AND I AM BEING TOLD IS OUT OF THE BUMPER TO BUMPER WARRANTY. THERE ARE ALSO NO OPEN RECALLS. I AM REPORTING THIS ISSUE TO THE NHTSA AND THE MASSACHUSETTS ATTORNEY GENERAL'S OFFICE, AS I BELIEVE THIS IS AN IMMEDIATE DANGER TO THE GENERAL MOTORING PUBLIC. I JUST CONTACTED CHEVROLET BY PHONE AND EMAIL. THE REPRESENTATIVE ON THE PHONE SAID ALL SHE COULD TELL ME IS THAT IT'S OUT OF WARRANTY, THERE WERE NO RECALLS, AND I AM BASICALLY ON MY OWN TO REPAIR. I HOPE YOU ARE ABLE TO INVESTIGATE THIS SITUATION, IDENTIFY THE CAUSE OF THIS FAILURE, AND COME UP WITH A REMEDY FOR THE SAFETY OF EVERYONE.

### 1 Affected Product -

Request Research (Services fees apply)

September 8, 2016 NHTSA ID NUMBER: 10904602



4 of 7 10/18/2017, 3:29 PM

# **Components: EXTERIOR LIGHTING, AIR BAGS, SERVICE BRAKES**

July 24, 2016 NHTSA ID NUMBER: 10888039

**Components: ELECTRICAL SYSTEM, ENGINE, SERVICE BRAKES** 



March 15, 2016 NHTSA ID NUMBER: 10849844

# Components: POWER TRAIN, SERVICE BRAKES, ELECTRICAL SYSTEM, STRUCTURE

**NHTSA ID Number:** 10849844

Incident Date July 18, 2015

**Consumer Location** Unknown

**Vehicle Identification Number** 1GNSCJKC9FR\*\*\*\*

# **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

TL\* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE ATTEMPTING TO BRAKE THE VEHICLE, THE BRAKES MADE AN ABNORMAL LOUD NOISE. THE VEHICLE WAS TAKEN TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE BRAKES AND ROTORS NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE RECURRED. THE CONTACT STATED THAT THE BRAKES AND ROTORS HAD BEEN REPLACED A TOTAL OF THREE TIMES SINCE THE PURCHASE OF THE VEHICLE. ALSO, WHILE ATTEMPTING TO ACCELERATE, THE VEHICLE HESITATED AND SLOWED DOWN. THE VEHICLE WAS TAKEN TO THE DEALER. THE CONTACT WAS INFORMED THAT THE VEHICLE HAD NOT FAILED AND THAT WAS HOW IT WAS CALIBRATED. THE CONTACT ALSO STATED THAT THE LIFTGATE FAILED TO OPEN AUTOMATICALLY AND HAD TO BE MANUALLY OPERATED. THE VEHICLE WAS TAKEN TO THE DEALER, BUT THE FAILURE COULD NOT BE DUPLICATED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURES. THE FAILURE MILEAGE WAS 43,000.

### 1 Affected Product •

Request Research (Services fees apply)

January 4, 2016 NHTSA ID NUMBER: 10817620

**Components: STEERING, SERVICE BRAKES** 

**NHTSA ID Number:** 10817620

**Incident Date** December 12, 2015

Consumer Location SEAFORD, NY

Vehicle Identification Number 1GNSCJKC9FR\*\*\*\*

# **Summary of Complaint**

CRASH	Yes	
EIDE	No	

TL\* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. THE CONTACT STATED THAT WHILE MAKING A LEFT TURN AT 20 MPH, THE BRAKE PEDAL WAS DEPRESSED AND

5 of 7 10/18/2017, 3:29 PM

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 16 of 35 PageID #: 43

INJURIES

1 FAILED TO RESPOND AS THE VEHICLE ACCELERATED WITHOUT WARNING. IN ADDITION,
THE CONTACT STATED THAT THE POWER STEERING FAILED. AS A RESULT, THE
CONTACT CRASHED INTO ANOTHER VEHICLE. A POLICE REPORT WAS FILED. THE
CONTACT SUSTAINED HEAD, NECK, BACK AND WRIST INJURIES THAT REQUIRED
MEDICAL ATTENTION. THE VEHICLE WAS TOWED BUT WAS NOT DIAGNOSED OR
REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE
MILEAGE WAS 46,000.

1 Affected Product ▼

Request Research (Services fees apply)

← prev

Page 3 of 4

next →

# **Recently Searched**

# 2015 GMC YUKON DENALI XL 1500

**SUV 4WD** 





OEVEX IMAGES

# 2015 CHEVROLET SUBURBAN 1500

**SUV RWD** 





OEVEX IMAGES

6 of 7

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 17 of 35 PageID #: 44



# 2015 CHEVROLET TAHOE



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10 RECALLS INVESTIGATIONS 0

COMPLAINTS 133

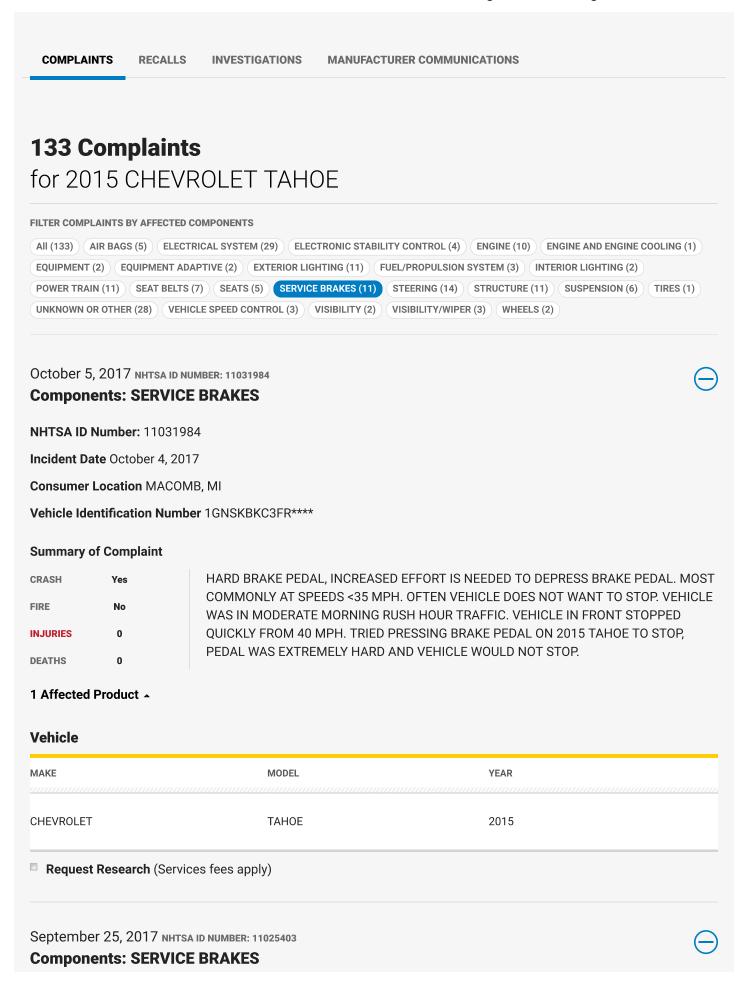


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Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 18 of 35 PageID #: 45



# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 19 of 35 PageID #: 46

**NHTSA ID Number:** 11025403

Incident Date September 22, 2017

Consumer Location TIFTON, GA

Vehicle Identification Number 1GNSCBKC4FR\*\*\*\*

# **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

AS I WAS SITTING IN THE VEHICLE IN PARK, I PLACED MY FOOT ON THE BRAKE AND NOTICED THAT THE BRAKE ASSIST HAD ACTIVATED WHILE IN PARK. I WAS UNABLE TO PUSH THE PETAL DOWN. I WAS ABLE TO MOVE THE SHIFTER INTO DRIVE WITH MY FOOT ON THE BRAKE, BUT THE VEHICLE IMMEDIATELY PLUNGED FORWARD. AS I CONTINUED TO TRY AND DEPRESS THE BRAKE PETAL, THE VEHICLE FINALLY SLOWED TO A STOP. BEFORE I COULD GET OFF THE ROAD AND OUT OF TRAFFIC, THE BRAKE ASSIST CONTINUED TO BE LOCKED UP AND THERE WAS NO BRAKES IF I SHIFTED INTO REVERSE. I WAS EXTREMELY CONCERNED FOR MINE AND MY CHILDREN'S SAFETY AS THIS COULD HAVE CAUSED A VERY SERIOUS ACCIDENT. THE BRAKES DID NOT STOP THE VEHICLE AND WERE DEFECTIVE DUE TO THE VACUUM PUMP "GOING OUT". THE VEHICLE IS ONLY 2 YEARS OLD AND HAS 49K MILES.

# 1 Affected Product -

## **Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	ТАНОЕ	2015

Request Research (Services fees apply)

September 11, 2017 NHTSA ID NUMBER: 11022709

# **Components: SERVICE BRAKES**

**NHTSA ID Number:** 11022709

Incident Date September 10, 2017

**Consumer Location MONSEY, NY** 

Vehicle Identification Number 1GNSK2EC4FR\*\*\*\*

# **Summary of Complaint**

CRASH	Yes
FIRE	No
INJURIES	0
DEATHS	0

WHEN APPLYING THE BRAKES MY CAR DOESN'T STOP 100% OF THE TIME. 1 TIME DURING HIGHWAY SLOW MOVING TRAFFIC, 3 TIMES BACKING OUT OF MY DRIVEWAY (FLAT SURFACE), 4 TIMES WHEN ON INCLINE/DECLINE OF ROAD. WHEN APPLYING BRAKES, HORRIBLE CHATTERING VIBRATION COMES FROM LEFT FRONT TIRE AREA, CHATTER VIBRATION IS FELT IN BRAKE PEDAL. NO MATTER HOW HARD I APPLY THE BRAKE THE CAR KEEPS GOING - IT WILL FINALLY STOP, BUT I ALMOST HIT THE CAR IN FRONT OF ME AT THE ONE HIGHWAY OCCURRENCE, 2 TIMES CAR FINALLY STOPPED

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 20 of 35 PageID #: 47

JUST BEFORE GOING OVER EDGE OF PROPERTY WHEN PULLING FORWARD & BACKWARD TO TURN AROUND IN TIGHT AREA. IN EACH INSTANCE I AM MOVING AT A VERY SLOW SPEED. I CONTACTED DEALERSHIP, THEY TOLD ME I WASN'T THE ONLY ONE CALLING ABOUT THIS HAPPENING BUT SINCE I'M OVER 36,000 WARRANTY THEY WILL CHARGE ME TO CK IT OUT,

# 1 Affected Product A

# **Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	TAHOE POLICE PURSUIT	2015

Request Research (Services fees apply)

September 5, 2017 NHTSA ID NUMBER: 11021419

# **Components: SERVICE BRAKES**

NHTSA ID Number: 11021419

Incident Date September 4, 2017

Consumer Location WILLIAMSPORT, PA

August 29, 2017 NHTSA ID NUMBER: 11020372

Vehicle Identification Number 1GNSKBKC0FR\*\*\*\*

# **Summary of Complaint**

CRASH	No	WHILE DRIVING ON THE ROAD IN TRAFFIC I WENT TO PRESS ON THE BRAKES AND
FIRE	No	NOTICED THEY HAD BECOME STIFF AND HAD TO PRESS THEM AS HARD AS POSSIBLE
FIKE	NO	TO SLOWLY STOP WHILE TRYING TO AVOID HITTING ANOTHER VEHICLE IN TRAFFIC. NO
INJURIES	0	WARNING LIGHTS WERE ON IN THE DASH UNTIL I PULLED OVER AND RESTARTED
DEATHS	0	VEHICLE A COUPLE OF TIMES. THEN I GOT THE ACTIVE BRAKE ASSIST SERVICE LIGHT
DEATHS	U	ON. I HAD THE VEHICLE TOWED TO THE NEAREST CHEVROLET SERVICE CENTER DUE
		TO THE VEHICLE NOT SAFE TO DRIVE

### 1 Affected Product A

### Vehicle

venicie			
MAKE	MODEL	YEAR	
CHEVROLET	ТАНОЕ	2015	
Request Research (Services fees apply)			

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 21 of 35 PageID #: 48

# **Components: SERVICE BRAKES**

NHTSA ID Number: 11020372

Incident Date August 13, 2017

Consumer Location CARMEL, IN

Vehicle Identification Number 1GNSKCKC1FR\*\*\*\*

# **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

TL\* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING AT 5 MPH, THE BRAKE PEDAL WAS APPLIED BUT FAILED TO RESPOND WITHOUT WARNING. THE VEHICLE WAS TOWED TO A LOCAL DEALER: COUGHLIN FORD OF CIRCLEVILLE LOCATED AT 24001 US HIGHWAY 23 S CIRCLEVILLE OH 49113 WHERE IT WAS DIAGNOSED THAT THE BRAKE SENSOR NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE VEHICLE WAS THEN TOWED TO HARE CHEVROLET LOCATED AT 2001 STONY CREED RD NOBLESVILLE IN 46060 WHERE IT WAS DIAGNOSED THAT THE VACUUM PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND OPENED CASE #8-31775454 BUT DID NOT OFFER ANY FURTHER ASSISTANCE. THE FAILURE MILEAGE WAS 31,000.

# 1 Affected Product A

# **Vehicle**

MAKE	MODEL	YEAR	
CHEVROLET	ТАНОЕ	2015	
Request Research (Services fees apply)			
← prev	Page 1 of	3	next →

# **Recently Searched**

# 2015 CHEVROLET TAHOE

**SUV 4WD** 

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 22 of 35 PageID #: 49

COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

# 133 Complaints

# for 2015 CHEVROLET TAHOE

FILTER COMPLAINTS BY AFFECTED COMPONENTS

All (133) AIR BAGS (5) ELECTRICAL SYSTEM (29) ELECTRONIC STABILITY CONTROL (4) ENGINE (10) ENGINE AND ENGINE COOLING (1) EQUIPMENT (2) EQUIPMENT ADAPTIVE (2) EXTERIOR LIGHTING (11) FUEL/PROPULSION SYSTEM (3) INTERIOR LIGHTING (2) POWER TRAIN (11) SEAT BELTS (7) SEATS (5) SERVICE BRAKES (11) STEERING (14) STRUCTURE (11) SUSPENSION (6) TIRES (1) UNKNOWN OR OTHER (28) VEHICLE SPEED CONTROL (3) VISIBILITY (2) VISIBILITY/WIPER (3) WHEELS (2)

May 4, 2015 NHTSA ID NUMBER: 10714400

# **Components: SERVICE BRAKES**

NHTSA ID Number: 10714400

Incident Date January 15, 2015

Consumer Location HOLLY SPRINGS, NC

Vehicle Identification Number 1GNSCBKC0FR\*\*\*\*

## **Summary of Complaint**

CRASH	No	
FIRE	No	
INJURIES	0	
DEATHS	0	

TL\* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. WHILE DRIVING AT 45 MPH, THE SERVICE BRAKE ASSIST WAS DISPLAYED ACROSS THE MESSAGE BOARD. IN ADDITION, THE CONTACT STATED THAT THE BRAKE PEDAL WAS DEPRESSED AND IT TOOK A GREATER AMOUNT OF TIME FOR THE VEHICLE TO COME TO A COMPLETE STOP. THE FAILURE RECURRED ON NUMEROUS OCCASIONS. THE VEHICLE WAS TAKEN TO A DEALER BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 16,562. UPDATED 6/18/15\*CN UPDATED 10/12/2017\*CN

1 Affected Product A

# **Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	TAHOE	2015

### 1 Associated Document -

**EVOQ Document** 

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 23 of 35 PageID #: 50



# 2016 CHEVROLET SUBURBAN 1500 SUV 4WD



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INVESTIGATIONS 0

COMPLAINTS 2



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**COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS** 23 Complaints for 2016 CHEVROLET SUBURBAN 1500 FILTER COMPLAINTS BY AFFECTED COMPONENTS All (23) ELECTRICAL SYSTEM (2) ENGINE (3) FUEL/PROPULSION SYSTEM (1) POWER TRAIN (2) SEAT BELTS (1) SEATS (1) SERVICE BRAKES (2) STEERING (1) STRUCTURE (4) SUSPENSION (3) TIRES (1) UNKNOWN OR OTHER (8) VEHICLE SPEED CONTROL (4) VISIBILITY (1) VISIBILITY/WIPER (1) WHEELS (3) April 4, 2017 NHTSA ID NUMBER: 10970605  $\oplus$ Components: SERVICE BRAKES, ELECTRICAL SYSTEM, VEHICLE SPEED CONTROL March 13, 2017 NHTSA ID NUMBER: 10965728 Components: SERVICE BRAKES, ENGINE, VEHICLE SPEED CONTROL **NHTSA ID Number:** 10965728 Incident Date March 13, 2017 Consumer Location LAND O' LAKES, FL Vehicle Identification Number 1GNSCJKC3GR\*\*\*\* **Summary of Complaint** TL\* THE CONTACT OWNS A 2016 CHEVROLET SUBURBAN. WHILE DRIVING 30 MPH, THE **CRASH** VEHICLE FAILED TO ACCELERATE. ALSO, THE BRAKES FAILED TO RESPOND WHEN THE **FIRE** Nο BRAKE PEDAL WAS DEPRESSED AND THE VEHICLE STALLED. THE FAILURE RECURRED **INJURIES** TWO MORE TIMES. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURES. THE APPROXIMATE FAILURE **DEATHS** MILEAGE WAS 14,000. 1 Affected Product A **Vehicle** MODEL YEAR MAKE CHEVROLET **SUBURBAN** 2016 Request Research (Services fees apply)

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 25 of 35 PageID #: 52



# 2014 CHEVROLET SILVERADO 1500



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17 RECALLS INVESTIGATIONS 0

COMPLAINTS 452



# Safety Ratings.

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COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

# **452 Complaints**

# for 2014 CHEVROLET SILVERADO 1500

All (452) AIR BAGS (27) ELECTRICAL SYSTEM (86) ELECTRONIC STABILITY CONTROL (49) ENGINE (58) ENGINE AND ENGINE COOLING (6)
EQUIPMENT (5) EXTERIOR LIGHTING (16) FUEL SYSTEM, GASOLINE (2) FUEL/PROPULSION SYSTEM (9) LATCHES/LOCKS/LINKAGES (1)
POWER TRAIN (79) SEAT BELTS (20) SEATS (24) SERVICE BRAKES (27) SERVICE BRAKES, HYDRAULIC (1) STEERING (109)
STRUCTURE (40) SUSPENSION (33) TIRES (7) UNKNOWN OR OTHER (54) VEHICLE SPEED CONTROL (15) VISIBILITY (7)
VISIBILITY/WIPER (8) WHEELS (20)

October 16, 2017 NHTSA ID NUMBER: 11033883

**Components: SERVICE BRAKES** 

NHTSA ID Number: 11033883

Incident Date October 2, 2017

Consumer Location LA VERNIA, TX

Vehicle Identification Number 3GCPCTEC9EG\*\*\*\*

# **Summary of Complaint**

CRASH No
FIRE No
INJURIES 0
DEATHS 0

PER ATTACHED WORK ORDERS, MY BRAKES WERE GOING TO THE FLOOR IN REVERSE ONLY. THEY REPLACED MASTER CYLINDER AND SAID ALL FIXED. SEVERAL WEEKS LATER HAPPENED AGAIN SO NOW REPLACED VACUUM & BOOSTER PUMP. THAT WAS 2 WEEKS AGO. STILL WORKING AND FILED COMPLAINT WITH GM BUT THEY SAID NOTHING THEY COULD DO. THESE HAVE NO MOVING OR MECHANICAL PARTS AND SHOULD PROBABLY NEVER WEAR OUT. PRIOR TO ALL THIS I WAS GETTING A REPORT TO SERVICE ELECTRONIC TRAILER BRAKES BUT HAD NOT HOOKED UP A TRAILER? WHEN FIRST POINTED THIS OUT THEY SAID COULD NOT FIND ANYTHING. SECOND TIME THEY REPLACED ELECTRONIC SWITCH AS "BAD". PERSONALLY I FEEL IT HAD NOTHING TO DO WITH ALL THE PARTS REPLACED AND FEEL STRONGLY THAT THIS IS ELECTRONIC AND RELATED TO THE ABS BRAKING SYSTEM ELECTRONICS OR MOTHER BOARD. VEHICLE WAS IN REVERSE MOVING SLOWLY. DAMAGED REAR BUMPER LAST FAIL DUE TO UNABLE TO STOP VEHICLE. IF SOMEONE WAS BEHIND ME DIRECTING ME THERE IS A GOOD CHANCE THEY COULD HAVE BEEN CRUSHED OR INJURED SERIOUSLY. I FEEL THIS IS A RECALL WAITING TO HAPPEN.

1 Affected Product A

**Vehicle** 

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 27 of 35 PageID #: 54

MAKE		MODEL	YEAR	
CHEVROLET		SILVERADO 1500	2014	
Request	Research (Se	ervices fees apply)		
•	ents: ELEC	IHTSA ID NUMBER: 11022580  TRICAL SYSTEM, SERVICE BRAKE	ES, ELECTRONIC STABILITY	<b>(+)</b>
_		A ID NUMBER: 11014788 VICE BRAKES, UNKNOWN OR OTHI	ER .	$\oplus$
-		NUMBER: 11006271		$\ominus$
NHTSA ID I	<b>Number:</b> 1100	06271		
Incident Da	<b>te</b> July 18, 20	017		
Consumer	Location KYL	E, TX		
Vehicle Ide	ntification Nu	umber N/A		
Summary o	f Complaint			
CRASH	No	WHILE DRIVING MY 2014 SILVERAD	O MY BRAKES BECAME HARD TO USE. I H	AD TO
FIRE	No	PUSH HARD WITH BOTH GET TO GET THEM TO WORK. THEN I DROVE THE REST OF T		
INJURIES	0		I TRIED TO PARK AND IT HAPPENED AGA JME PUMP ISSUE THAT IS COMMON IN T	
DEATHS	0			
1 Affected	Product 🔺			
Vehicle				
MAKE		MODEL	YEAR	
WAKE		WODEL	TEAN.	
CHEVROLET		SILVERADO 1500	2014	
Request	Research (Se	ervices fees apply)		

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 28 of 35 PageID #: 55

June 26, 2017 NHTSA ID NUMBER: 11001423
Components: SERVICE BRAKES

NHTSA ID Number: 11001423

Incident Date March 4, 2017

Consumer Location COLUMBUS GROVE, OH

Vehicle Identification Number 3GCUKREC4EG\*\*\*\*

# **Summary of Complaint**

CRASH	No	
FIRE	No	
INJURIES	0	

VERY VERY HARD BRAKE PEDDLE AT LOW SPEEDS. I HAVE BEEN TOLD THE VACUUM PUMP NEEDS REPLACED. THE VEHICLE HAD LESS THAN 50,000 MILES.

1 Affected Product -

## **Vehicle**

**DEATHS** 

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014
Request Research (Services fees apply)		
← prev	Page 1 of 6	next →

# **Recently Searched**

# 2014 CHEVROLET SILVERADO 1500

**PU/RC RWD** 

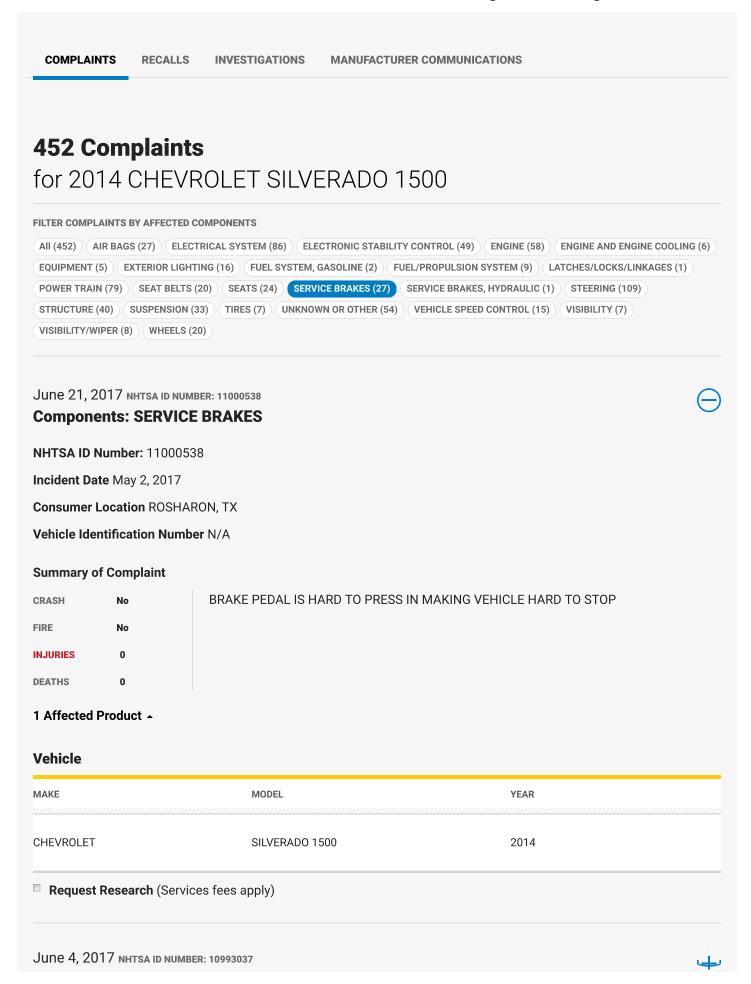




EVEX IMAGES

Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 29 of 35 PageID #: 56

https://www.nhtsa.gov/vehicle/2014/CHEVROLET/SILVERADO%252...



Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 30 of 35 PageID #: 57

# **Components: SERVICE BRAKES, UNKNOWN OR OTHER**

May 25, 2017 NHTSA ID NUMBER: 10991595

**Components: SERVICE BRAKES** 

NHTSA ID Number: 10991595

Incident Date May 21, 2017

Consumer Location ALEXANDRIA, VA

Vehicle Identification Number 3GCUKREC7EG\*\*\*\*

# **Summary of Complaint**

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

NO POWER BRAKES. AT LOW SPEEDS VACUUM PUMP DOES NOT PROVIDE ENOUGH VACUUM FOR BRAKES TO WORK. VERY HARD BRAKE PEDAL FEELS LIKE YOU HAVE NO BRAKES. THERE IS A SERVICE BULLETIN PIT5361B WHEN I SPOKE TO CHEVROLET CUSTOMER SERVICE THEY TOLD ME MY TRUCK WASN'T COVERED UNDER THIS BUT IT CLEARLY IS. THIS IS VERY UNSAFE AND MIGHT CAUSE MANY ACCIDENTS OR DEATHS

### 1 Affected Product A

## **Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

Request Research (Services fees apply)

May 10, 2017 NHTSA ID NUMBER: 10984684

# **Components: SERVICE BRAKES**

**NHTSA ID Number:** 10984684

Incident Date May 8, 2017

Consumer Location RICHARDSON, TX

**Vehicle Identification Number 1GCRCREH3EZ\*\*\*\*** 

# **Summary of Complaint**

CRASH	No	
FIRE	No	
INJURIES	0	
DEATHS	0	

MY TRUCK HAS 43K MILES ON IT. DRIVING IT THE OTHER DAY ON A CITY STREET, I HEARD A SQUEALING SOUND, AND THEN THE BRAKES FAILED. I HAD TO PUSH DOWN REALLY HARD TO AVOID REAR ENDING A CAR IN FRONT OF ME ON MY WAY HOME. WHEN I GOT HOME I COULD SEE THAT THE BELT POWERING THE VACUUM ASSIST PUMP FOR THE BRAKES HAD SNAPPED. SO I WENT TO AUTOZONE AND PURCHASED ANOTHER ONE. PUT IT ONE AND STARTED THE TRUCK. THE SQUEALING WAS QUITE

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 31 of 35 PageID #: 58

LOUD BECAUSE THE BELT WAS TURNING, BUT NOT THE VACUUM PUMP. SO I REMOVED THE PUMP AND DISCOVERED LARGE AMOUNTS OF METAL SHARDS IN THE OIL, WHICH NOW MEANS I CAN'T DRIVE THE TRUCK WITHOUT RISKING TAKING OUT MY ENGINE. THIS SHOULD NOT BE HAPPENING ON A 3 YEAR OLD VEHICLE.

1 Affected Product •

Request Research (Services fees apply)

April 27, 2017 NHTSA ID NUMBER: 10981050

**Components: SERVICE BRAKES** 



← prev

Page 2 of 6

next →

# **Recently Searched**

# 2014 CHEVROLET SILVERADO 1500

**PU/RC RWD** 



**OVERALL SAFETY RATING** 



GEVEX IMAGES

# 2016 CADILLAC ESCALADE

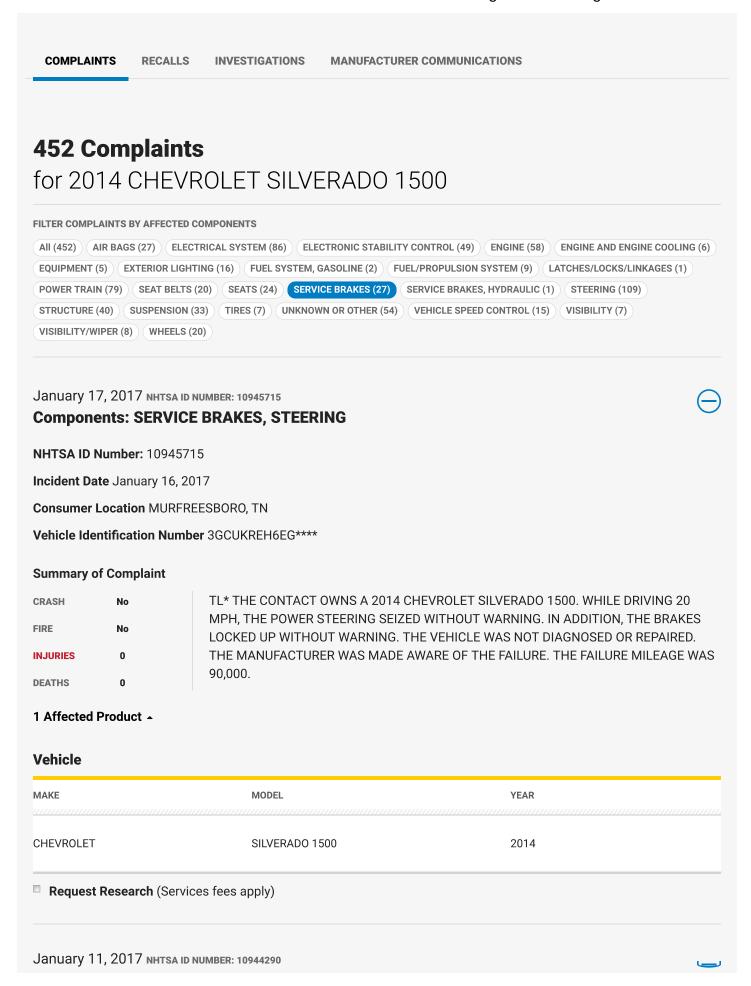
**SUV RWD** 

Not been rated
OVERALL SAFETY RATING

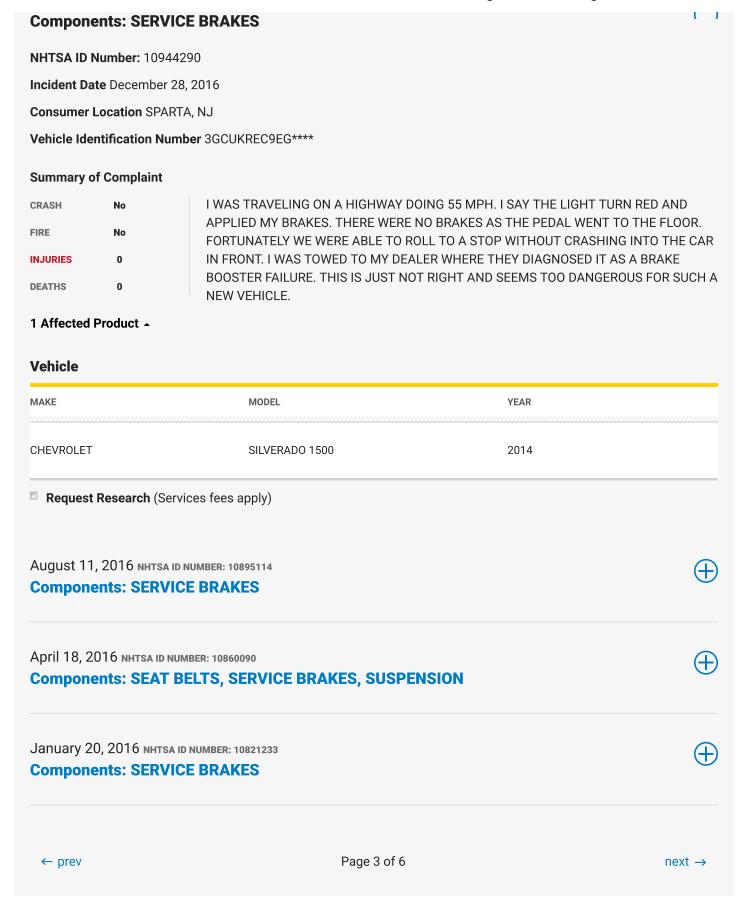


**GEVEX IMAGES** 

6 of 7



# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 33 of 35 PageID #: 60



**Recently Searched** 

2014

**COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS 452 Complaints** for 2014 CHEVROLET SILVERADO 1500 FILTER COMPLAINTS BY AFFECTED COMPONENTS All (452) AIR BAGS (27) ELECTRICAL SYSTEM (86) ELECTRONIC STABILITY CONTROL (49) ENGINE (58) ENGINE AND ENGINE COOLING (6) EQUIPMENT (5) EXTERIOR LIGHTING (16) FUEL SYSTEM, GASOLINE (2) FUEL/PROPULSION SYSTEM (9) LATCHES/LOCKS/LINKAGES (1) POWER TRAIN (79) SEAT BELTS (20) SEATS (24) SERVICE BRAKES (27) SERVICE BRAKES, HYDRAULIC (1) STEERING (109) STRUCTURE (40) SUSPENSION (33) TIRES (7) UNKNOWN OR OTHER (54) VEHICLE SPEED CONTROL (15) VISIBILITY (7) VISIBILITY/WIPER (8) WHEELS (20) March 10, 2015 NHTSA ID NUMBER: 10693235  $\oplus$ **Components: STRUCTURE, SERVICE BRAKES** January 16, 2015 NHTSA ID NUMBER: 10673007 Components: SERVICE BRAKES, VEHICLE SPEED CONTROL, AIR BAGS **NHTSA ID Number:** 10673007 Incident Date January 14, 2015 Consumer Location FORT SMITH, AR Vehicle Identification Number 1GCRCREC8EZ\*\*\*\* **Summary of Complaint** I WAS GOING NORTH WHEN A VEHICLE SUDDENLY STOPPED IN FRONT OF ME. I BRAKED **CRASH** AS QUICKLY AS POSSIBLE, THE 2014 CHEVY SILVERADO THAT I WAS DRIVING ONLY FIRE Nο SLOWLY CAME TO A STOP. UNFORTUNATELY, I REARENDED ANOTHER VEHICLE. THANKFULLY I HAD NOT GOTTEN UP TO THE SPEED LIMIT (30MPH) AND WAS ONLY **INJURIES** GOING 20MPH. MY TRUCK WOULD NOT BRAKE QUICKLY. NO SCREECHING TIRES, NO **DEATHS** BLACK MARKS ON THE ROAD. THE STOP WAS SO SLOW THAT I HAD TIME TO TURN THE STEERING WHEEL AND ONLY DAMAGE PART OF MY FRONT END. THE GRILL, BUMPER, AND HOOD WERE SMASHED IN. NO AIRBAGS CAME OUT OF THE TRUCK, AND MY ONSTAR SERVICE SENSOR DID NOT GO OFF. AFTER COLLIDING WITH THE VEHICLE MY 2014 CHEVY SHUT OFF BY ITSELF. I HAD THE BRAKE STILL DEPRESSED & PUT THE TRUCK INTO PARK. \*TR

1 Affected Product A

**Vehicle** 

10/18/2017, 3:46 PM

# Case 5:17-cv-00180 Document 1-3 Filed 10/23/17 Page 35 of 35 PageID #: 62

MAKE	MODEL	YEAR					
CHEVROLET	SILVERADO	2014					
Request Research (Serv	vices fees apply)						
January 16, 2015 NHTSA I Components: AIR BA	ID NUMBER: 10672998 AGS, VEHICLE SPEED CONTROL	., SERVICE BRAKES	$\ni$				
NHTSA ID Number: 10672	998						
Incident Date January 14,	2015						
Consumer Location FORT	SMITH, AR						
Vehicle Identification Num	nber 1GCRCREC8EZ****						
Summary of Complaint							
CRASH Yes  FIRE No  INJURIES 1  DEATHS 0  1 Affected Product •  Vehicle	I WAS GOING NORTH WHEN A VEHICLE SUDDENLY STOPPED IN FRONT OF ME. I BRAKED AS QUICKLY AS POSSIBLE, THE 2014 CHEVY SILVERADO THAT I WAS DRIVING ONLY SLOWLY CAME TO A STOP. UNFORTUNATELY, I REARENDED ANOTHER VEHICLE.  THANKFULLY I HAD NOT GOTTEN UP TO THE SPEED LIMIT (30MPH) AND WAS ONLY GOING 20MPH. MY TRUCK WOULD NOT BRAKE QUICKLY. NO SCREECHING TIRES, NO BLACK MARKS ON THE ROAD. THE STOP WAS SO SLOW THAT I HAD TIME TO TURN THE STEERING WHEEL AND ONLY DAMAGE PART OF MY FRONT END. THE GRILL, BUMPER, AND HOOD WERE SMASHED IN. NO AIRBAGS CAME OUT OF THE TRUCK, AND MY ONSTAR SERVICE SENSOR DID NOT GO OFF. *TR						
CHEVROLET	SILVERADO	2014	010				
Request Research (Serv	vices fees apply)						
November 20, 2014 NHTS Components: ELECTION	SA ID NUMBER: 10659651 RICAL SYSTEM, SERVICE BRAI	(ES	$\oplus$				
August 13, 2014 NHTSA ID Components: POWEF	NUMBER: 10622123 R TRAIN, STEERING, SERVICE E	BRAKES (-	$\oplus$				

5 of 7

# STONE & SAWYER, PLLC

ATTORNEYS AT LAW 315 EAST MAIN EL DORADO. AR 71730 (870) 862-5565 Phone (870) 863-5889 Fax

Phillip A. Stone R. Jeffrey Sawyer

writer's direct e-mail jsawyer@southarklaw.com

May 4, 2017

# SENT VIA ELECTRONIC MAIL ONLY

General Motors Customer Assistance Center Attention: Ms. Pam Brown gmcacupdate@gm.com

RE: Teague Auto Group, Inc.

Case Numbers: 856255; 8-2803408674

Dear Ms. Brown,

Please be advised that this firm represents Teague Auto Group, Inc. (hereafter, "Teague"). The above case numbers involve a 2015 Chevrolet Suburban (hereafter, the "Vehicle") purchased by Dr. John J. Harris from Teague.

On February 1, 2017, the wife of Dr. Harris brought the Vehicle to Teague with complaints of the brake pedal becoming hard after being used multiple times. The issue presented by Mrs. Harris was consistent with GM Bulletin # PIT5361B (hereafter, the "Bulletin"). Teague repaired the Vehicle in accordance with the Bulletin on February 3, 2017. On February 4, 2017, Teague caused the Vehicle to be personally delivered to Mrs. Harris in Texarkana. Texas, which is approximately ninety (90) miles from Teague's location in El Dorado, Arkansas.

On March 3, 2017, a representative of Teague, Mark Trosclair, was contacted by Dr. Harris to advise that Mrs. Harris was involved in a car accident. Dr. Harris indicated that the accident was caused by the Vehicle failing to brake. On March 8, 2017, Mark Trosclair contacted Tremell Walker, Teague's GM Representative, via email and advised GM of the accident. That same day, Mr. Tremell directed Teague, via email, to "STOP ALL WORK ON THE VEHICLE!" Mr. Walker went on to say in his email that Teague "can't do anything else with that vehicle". Teague was advised to contact the GM Customer Assistance Center and that the situation would be handled from there. A copy of said email is attached hereto as Exhibit A. Teague contacted the GM Customer Assistance Center the same day and opened a case.

On March 9, 2017, Mr. Trosclair contacted Dr. Harris to advise that a case was opened with GM, and that he should contact the GM Customer Assistance Center for further direction.

Believing that GM would make good on the case that was opened, Teague took no further action regarding this matter until Mrs. Harris contacted a representative of Teague, Garrott Smith, on April 29, 2017. Mrs. Harris advised Mr. Smith that she had not been able to speak with anyone at the GM Customer Assistance Center and desired for Teague to repair the Vehicle. On May 1, 2017, three (3) different representatives from Teague, Mark Trosclair, Billy Deaton, and John Lemke, all attempted to contact you at the GM Customer Assistance Center regarding this issue. On May 2, 2017, you returned the telephone calls, and spoke with John Lemke, General Manager of Teague. In that telephone conversation, you instructed Mr. Lemke to obtain the Vehicle and make repairs pursuant to the Bulletin. Mr. Lemke told you that repairs had previously been made by Teague pursuant to the Bulletin on February 3, 2017, and suggested a field engineer from GM inspect the Vehicle. You advised that a GM field engineer had inspected the Vehicle in Texarkana and that the Vehicle's brakes failed during the inspection. Mr. Lemke then advised you that Teague would not make any further repairs to the Vehicle.

Please accept this correspondence as notice that Teague will not perform further work on the Vehicle pursuant to GM's email correspondence of March 8, 2017. Teague complied with GM's request of March 8, 2017, to forbear from any further repairs to the Vehicle and relied upon GM's assurances that the Customer Assistance Center would handle the issue moving forward. Much to Teague's surprise, almost eight weeks after Teague advised GM's Customer Assistance Center of this problem, GM had not contacted Dr. and Mrs. Harris, failed to return the customers' calls, and had done nothing to repair the Vehicle or resolve this issue. Teague is disappointed with the customer service Dr. and Mrs. Harris have received from GM. GM should make it a top priority to promptly rectify this problem as Teague was led to believe you would do. Kindly confirm receipt of this correspondence, and advise as to the steps GM is taking to expeditiously resolve this situation in a manner that Dr. and Mrs. Harris, along with all our customers, expect and deserve.

Sincerely,

1 Jassey Sawyer
R. Jeffrey Sawyer

RJS/ac

cc: Teague Auto Group, Inc.

Dr. and Mrs. John J. Harris 7411 Palisades Drive Texarkana, TX 75503 From: Tremell Walker

Sent: Wednesday, March 08, 2017 4:09 PM

To: Mark Trosclair

Subject: RE: [EXTERNAL] VEHICLE DAMAGE

# STOP ALL WORK ON THE VEHICLE!

You can't do anything else with that vehicle and must call CAC. Ask for the product allegation department and they should handle it from there once you explain to them the issue.

From: Mark Trosclair [mailto:marktrosclair@teagueautogroup.com]

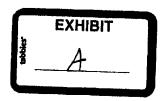
Sent: Wednesday, March 8, 2017 2:30 PM
To: Tremell Walker < <a href="mailto:tremell.walker@gm.com">tremell.walker@gm.com</a>
Subject: [EXTERNAL] VEHICLE DAMAGE

Importance: High

Tremell, We have a customer with a 2015 Suburban, he has had several issues. The last concern was brakes not stopping the vehicle. We found oil in the booster and replaced the booster, vac. pump and hose per the service bulletin and verified the repair. Now his wife has crashed into another vehicle and stated the braking system was the cause. His insurance has been contacted. At this point I would open a consumer affairs case were it a Ford vehicle. Does GM have such a program? Does this vehicle qualify for trade assistance? vin # 1GNSCKKC8FR500471, mileage 42521. Mr. Harris's insurance is covering the repairs, but he is very apprehensive about operating the vehicle again and thinks GM should be responsible for the vehicle and its issues. Mark

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Confidentiality Note: This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.





# 2015 **SUBURBAN**

Sr... QK C

司机

# STANDARD EQUIPMENT

ITEMS FEATURED BELOW ARE INCLUDED AT NO EXTRA CHARGE IN THE STANDARD VEHICLE PRICE SHOWN

- POWERTRAIN LIMITED WARRANTY 5 YEAR / 100,000 MILE
- **4 WHEEL TIRE ROTATION** OIL & FILTER 2YR/24,000 MILES SCHEDULED MAINTENANCE
- MECHANICAL <u>DEALER FOR DE</u>TAILS

SEE WWW.CHEVY.COM OF

- 5.3L V8 ECOTEC3 ENGINE
- 6 SPD AUTOMATIC TRANSMISSION
- FULLY AUTOMATIC LOCKING REAR DIFFERENTIAL
- REAR AXLE 3.08 RATIO
- FRONT AND REAR PARK ASSIST
- ENGINE OIL COOLING SYSTEM TRAILERING EQUIPMENT
- 4-WHEEL ANTILOCK DISC BRAKES

# SAFETY & SECURITY

- FORWARD COLLISION ALERT
- LANE DEPARTURE ALERT SIDE BLIND ZONE ALERT WITH
- REAR CROSS TRAFFIC ALERT
- SAFETY ALERT SEAT LANE DEPARTURE WARNING &
- REAR VISION CAMERA
- (EXCL SPARE TIRE) TIRE PRESSURE MONITOR SYSTEM
- FOR ALL ROWS IN OUTBOARD SEAT & HEAD CURTAIN SIDE-IMPACT SEAT MOUNTED, SIDE-IMPACT AND PASSENGER, DRIVER INBOARD IMPACT, FOR DRIVER AND FRONT

# EXTERIOR

- HEADLAMPS W/ LAMP CONTROL
- FRONT FOG LAMPS
- RAIN SENSING

BODYSIDE MOLDINGS, BODY COLOR

W/ TURN SIGNAL

WINDSHIELD WIPERS

POWER HEATED OUTSIDE MIRROR

LUGGAGE RACK SIDE RAILS

ASSIST STEPS

PASSIVE ENTRY SYSTEM, INCL

REMOTE KEYLESS ENTRY

- AIR BAGS, FRONTAL AND SIDE
- **POSITIONS**
- HIGH INTENSITY DISCHARGE

POWER HANDSFREE LIFTGATE W/

17" STEEL SPARE WHEEL

PROGRAMMABLE HEIGHT

• 20" POLISHED ALUMINUM WHEELS:

- LEATHER APPOINTED FRONT BUCKET SEATS
- MEMORY SETTINGS, DRIVER SEAT, PEDALS, COLUMN, AND MIRRORS
- DRIVER AND FRONT PASSENGER HEATED & COOLED SEATS DRIVER & FRONT PASSENGER
- PWR SEAT ADJUSTER

# 2ND ROW BUCKET SEATS, POWER

Gasoline Vehicle

Overall V

Should ONLY Based on the

# 

Fuel Economy

MPG

Standard SUVs range from 13 to 26 MPG The best vehicle rates 119 MPGe.

Fuel

Economy

and

Environment

over 5 years more in fuel costs

average new vehicle compared to the

ODG

Side

Should ONL

Crash

**Frontal** 

Based on th

Crash

Based on the

Rollover

Smog Rating (tailpipe only)

Star ratin Based on tr

ົດ

Annual fuel COSt

Fuel Economy & Greenhouse Gas Rating (tailpipe only)

combined

6

highway

**5.6** gallons per 100 miles

10

Sou



per mile (tailpipe only). Producing and

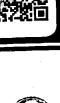


distributing fuel also create emissions; learn more

This vehicle emits 481 grams CO2 per mile. The best emits 0 grams











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**EXTERIOR: WHITE DIAMOND TRICOAT** 

**ENGINE, 5.3L V8 ECOTEC3** TRANSMISSION, 6 SPD AUTOMATIC

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# INTERIOR: COCOA/DUNE

Visit us at www.chevy.com

RELEASE

- BENCH, POWER FOLD FLAT SEATS, 3RD ROW 60/40 SPLIT-**HEATED 2ND ROW SEATS**
- ROWER ADJUSTABLE PEDALS REMOTE VEHICLE START
- AUTO DIMMING INSIDE ÇARVIEW MIRROR
- **野WER TILT & TELESCOPING** EERING COLUMN
- MEATHER WRAP STEERING WHEEL
- PHEATED STEERING WHEEL
- STEERING WHEEL CONTROLS
- TRI-ZONE AUTOMATIC HVAC SPEAKER BOSE CENTERPOINT
- ABRROUND SOUND AUDIO SYSTEM
- 1710-VOLT AC POWER OUTLET
- WIRELESS CHARGING AJNIVERSAL HOME REMOTE

# **DUNECTIVITY FEATURES**

SPOT W/ 3GB/3MO DATA TRIAL QNSTAR(R) 4G LTE WI-FI(R)

> DIAGONAL TOUCH SCREEN CHEVROLET MYLINK WITH AND NAVIGATION & NAV) (SEE ONSTAR.COM) PLAN (OMITS SAFETY, SECURITY NAV PLUS 5-YEAR ONSTAR BASIC **CRASH RESPONSE & TURN-BY-TURN** CONNECTIONS W/ AUTOMATIC 6 MTH ONSTAR(R) DIRECTIONS &

# **OPTIONS & PRIGING**

MANUFACTURER'S SUGGESTED RETAIL PRICE

STANDARD VEHICLE PRICE \$63,035.00

OPTIONS INSTALLED BY THE MANUFACTURER (MAY REPLACE STANDARD EQUIPMENT SHOWN)

22" WHEEL, SILVER W/BLACK

2,995.00

INSERTS (DEALER INSTALLED/ REPLACES

PACKAGE: SUN, ENTERTAINMENT, DESTINATION FACTORY OR OPTIONAL WHEELS) 2,810.00

POWER SUNROOF

REAR SEAT ENTERTAINMENT

 ADD'L 9 MONTHS XM RADIO RETRACTABLE RUNNING BOARDS, POWER

1,745.00

995.00 300.00

MAX TRAILERING PACKAGE: WHITE DIAMOND TRICOAT

 TRAILER BRAKE CONTROLLER REAR AXLE, 3.42 RATIO

SUN, ENTERTAINMENT AND DESTINATIONS PACKAGE DISCOUNT DESTINATION CHARGE
TOTAL BEFORE SAVINGS TOTAL VEHICLE & OPTIONS TOTAL OPTIONS \$8,845.00 \$71,880.00 1,195.00 \$73,075.00 -500.00

TOTAL VEHICLE PRICE\* \$72,575.00

# NMENT 5-STAR SAFETY RATINGS

# deatings of frontal, side and rollover. area to other vehicles of similar size and weight.

Wore

Driver

d to other vehicles of similar size and weight. in a frontal impact.

Passenger

Front seat

\*\*

Rear seat

ffly in a side impact.

llover in a single-vehicle crash

 $\star$ 

nal Highway Traffic Safety Administration (NHTSA) from 1 to 5 stars ( $\star\star\star\star\star$ ) with 5 being the highest www.safercar.gov or 1-8 327-4236

**Equipped with the safety** 

and connectivity of OnStar?

JUE

Visit onstar.com for details

# PARTS CONTENT INFORMATION

FOR VEHICLES IN THIS CARLINE: **U.S./CANADIAN PARTS CONTENT: 60% CONTENT: MEXICO 28%** MAJOR SOURCES OF FOREIGN PARTS

ASSEMBLY, DISTRIBUTION, OR OTHER NON-PARTS COSTS. NOTE: PARTS CONTENT DOES NOT INCLUDE FINAL

FOR THIS VEHICLE: ARLINGTON, TX **COUNTRY OF ORIGIN:** FINAL ASSEMBLY POINT: **ENGINE: UNITED STATES** TRANSMISSION: UNITED STATES

ORDER NO RZMWOC SALES CODE E SALES MODEL CODE CC15906 DEALER NO 24868

FINAL ASSEMBLY: ARLINGTON, TX U.S.A

VIN 1GNSCKKC8FR500471

PO BOX 69 MANY, LA 71449-0069 DEALER TO WHOM DELIVERED JULIAN FOY MOTORS, INC

© 2009 General Motors LLC GMLBL\_PROD\_0032 ~ 8/10/2014



JS 44 (Rev. 12/12)

# **CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

parpose of initiating the erri de	Tomas I am a series in a serie						
I. (a) PLAINTIFFS JOHN J. HARRIS, ON BE SIMILARLY SITUATED	EHALF OF HIMSELF A	AND ALL OTHERS		DEFENDANTS GENERAL MOTOR	RS CORPORATION		
(b) County of Residence of First Listed Plaintiff Bowle (EXCEPT IN U.S. PLAINTIFF CASES)				County of Residence of First Listed Defendant  (IN U.S. PLAINTIFF CASES ONLY)  NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.			
(c) Attorneys (Firm Name, A Sean F.Rommel, Wyly-Ro 4004 Texas Boulevard, T (903) 334-8646	ommel, PLLC	)		Attorneys (If Known)			
II. BASIS OF JURISDI	CTION (Place an "X" in O.	ne Box Only)		TIZENSHIP OF PI (For Diversity Cases Only)	RINCIPAL PARTIES	(Place an "X" in One Box for Plaintiff and One Box for Defendant)	
□ 1 U.S. Government Plaintiff				PT en of This State			
<ul><li>2 U.S. Government Defendant</li></ul>	3 4 Diversity (Indicate Citizenshi	p of Parties in Item III)	Citize	en of Another State	of Business In a	Another State	
				en or Subject of a  reign Country	3		
IV. NATURE OF SUIT		<i>ly)</i> RTS	F(	ORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment Æ Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits	PERSONAL INJURY  310 Airplane  315 Airplane Product Liability  320 Assault, Libel &	PERSONAL INJUR  365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPEI 370 Other Fraud 371 Truth in Lending	O 69	25 Drug Related Seizure of Property 21 USC 881 00 Other  LABOR 10 Fair Labor Standards Act 20 Labor/Management	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal	☐ 375 False Claims Act ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/ Exchange ☐ 890 Other Statutory Actions	
⊠ 190 Other Contract     □ 195 Contract Product Liability     □ 196 Franchise      REAL PROPERTY     □ 210 Land Condemnation     □ 220 Foreclosure	Product Liability  360 Other Personal Injury  362 Personal Injury - Medical Malpractice  CIVIL RIGHTS  440 Other Civil Rights  441 Voting	□ 380 Other Personal Property Damage □ 385 Property Damage Product Liability  PRISONER PETITIO Habeas Corpus: □ 463 Alien Detainee	0 75 0 75 0 75	Relations 40 Railway Labor Act 51 Family and Medical Leave Act 90 Other Labor Litigation 91 Employee Retirement Income Security Act	☐ 864 SSID Title XVI ☐ 865 RSI (405(g))  FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party	□ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information	
☐ 230 Rent Lease & Ejectment☐ 240 Torts to Land☐ 245 Tort Product Liability☐ 290 All Other Real Property	442 Employment     443 Housing/     Accommodations     445 Amer. w/Disabilities -     Employment     446 Amer. w/Disabilities -     Other     448 Education	☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Otl ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 60 Civil Detainee - Conditions of Confinement	<u> </u>	IMMIGRATION 62 Naturalization Application 65 Other Immigration Actions	26 USC 7609	State Statutes	
	moved from	Appellate Court		pened Anothe (specify)	r District Litigation		
VI. CAUSE OF ACTIO	ON Brief description of ca	1332	_	Do not cite jurisdictional stat			
VII. REQUESTED IN COMPLAINT:		IS A CLASS ACTIO	N D	DEMAND sin exc 5,000,000	ess CHECK YES only JURY DEMAND	if demanded in complaint: : 🔀 Yes 🗆 No	
VIII. RELATED CASI	E(S) (See instructions):	JUDGE			DOCKET NUMBER		
DATE		SIGNAZUBE OF AT		OF RECORD			
10/23/2017		SINIE	m				
FOR OFFICE USE ONLY  RECEIPT # A	MOUNT	APPLYING IFP		JUDGE	MAG. JU	JDGE	

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This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>Class Action Against GM Cites Six Vehicle Models with Possible Brake Defect</u>