

**United States District Court for the Southern District of New York**

**NOTICE OF PROPOSED SETTLEMENT**

**If You Are a Current or Former Owner or Lessee of a GM Vehicle that Was Subject to Certain 2014 Recalls, You May Have Rights and Choices in a Proposed Settlement.**

*The District Court for the Southern District of New York authorized this Notice.  
This is not a solicitation from a lawyer.*

**If you are a Class Member (as defined below), your legal rights may be affected whether you act or do not act.**

**Please Read this Notice Carefully**

- This Notice is to inform you of the proposed settlement (the “Settlement”) of economic loss claims by persons who owned or leased certain GM vehicles that were recalled in 2014. The recalls involved the ignition system, key rotation, electronic power steering and/or side airbag wiring. Plaintiffs claim that consumers overpaid when they bought or leased these vehicles. General Motors LLC (“New GM”), the Motors Liquidation Company GUC Trust (“GUC Trust”), and the Motors Liquidation Company Avoidance Action Trust (“AAT”) deny these allegations. Plaintiffs, the GUC Trust, New GM and the AAT have agreed to a Settlement to avoid the risk and cost of further litigation. The Settlement will not include the release of any claims for personal injury, wrongful death or actual physical injury.
- Subject to court approval, the Settlement will establish a settlement fund of \$121.1 million to pay claims to eligible Class Members who submit a claim form online or by mail before the deadline which will be posted on the website. Payment amounts to eligible Class Members will vary depending on which recall applied to their vehicle, settlement implementation costs, the number and type of eligible vehicles for which claims are filed, and the number of eligible class members who file claims.
- The Plaintiffs, or persons suing, New GM and the GUC Trust filed a joint motion (the “Settlement Motion”) in the District Court seeking an order preliminarily approving the Settlement Agreement (the “Settlement Order”). The District Court preliminarily approved the Settlement pursuant to the Settlement Order. The District Court may enter additional orders pertaining to the Settlement. The Settlement Motion, the Settlement Order, the Amended Settlement Agreement and any additional orders entered by the District Court pertaining to the Settlement can be found at [www.GMIgnitionSwitchEconomicSettlement.com](http://www.GMIgnitionSwitchEconomicSettlement.com) (the “Settlement Website”).

## YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

<b>File a Claim</b>	<ul style="list-style-type: none"> <li>• A Class Member must file an eligible claim in order to receive a payment from the \$121.1 million Settlement Fund (described below).</li> <li>• Class Members may complete a claim form for payment online or by mail. Claims must be postmarked or submitted online by the claims deadline which will be no earlier than <b>March 18, 2021</b>.</li> <li>• Procedures for the administration of claims and allocation of the Settlement Fund to Class Members are described in the Settlement Claim Review Protocol and Allocation Decision, which are exhibits to the Amended Settlement Agreement.</li> <li>• More information about how to file a claim can be found at <b><a href="http://www.GMIgnitionSwitchEconomicSettlement.com">www.GMIgnitionSwitchEconomicSettlement.com</a></b>.</li> </ul>
<b>Exclude Yourself or “Opt Out”</b>	<ul style="list-style-type: none"> <li>• Class Members who exclude themselves - or “opt out” - from the Settlement will not receive any Settlement benefits.</li> <li>• Only Class Members who opt out of the Settlement will retain the right to sue New GM, the GUC Trust and/or the AAT and certain other related parties about the same claims alleged in this lawsuit, at their own expense.</li> <li>• More information about how to opt out of the Settlement can be found in paragraph 8 below and at <b><a href="http://www.GMIgnitionSwitchEconomicSettlement.com">www.GMIgnitionSwitchEconomicSettlement.com</a></b>.</li> </ul>
<b>Object</b>	<ul style="list-style-type: none"> <li>• Class Members can write to the District Court to object to the Settlement and explain why they do not like the Settlement.</li> <li>• More information about how to object can be found in paragraph 10 below and at <b><a href="http://www.GMIgnitionSwitchEconomicSettlement.com">www.GMIgnitionSwitchEconomicSettlement.com</a></b>.</li> </ul>
<b>Go to the Hearing</b>	<ul style="list-style-type: none"> <li>• The Court will hold a hearing on <b>December 18, 2020 at 9:30 a.m. (Eastern Time)</b> to determine whether to approve the Settlement Agreement.</li> <li>• The Court will consider objections to the Settlement and objecting Class Members may ask to speak at the hearing.</li> </ul>
<b>Do Nothing</b>	<ul style="list-style-type: none"> <li>• Class Members who do nothing will not receive Settlement benefits, if they become available.</li> <li>• Class Members who do nothing (and do not opt out of the Settlement, as described above) will give up their right to sue New GM, the GUC Trust, the AAT and certain other related parties about the economic loss claims.</li> </ul>

**WHAT THIS NOTICE CONTAINS**

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**A. BASIC INFORMATION**

**1. What is this Notice and why should I read it?**

This Notice provides information about the Settlement of all economic loss claims relating to the Recalls filed in the United States District Court for the Southern District of New York in *In re: General Motors Ignition Switch Litigation*, Case No. 14-MD-2543 (JMF) (“MDL 2543”), as well as those filed in the past, present or future in any federal or state court or other tribunal, and all economic loss claims in the chapter 11 case pending in the United States Bankruptcy Court captioned *In re Motors Liquidation Company, et al., f/k/a General Motors Corp., et al.*, Case No. 09-50026 (MG) filed in the United States Bankruptcy Court for the Southern District of New York. (collectively, the “Actions”). These economic loss claims are made by current and former owners and lessees of GM vehicles containing ignition switches, side airbag wiring, and/or electronic power steering systems that were subject to recalls with the National Highway Traffic Safety Administration (“NHTSA”) recall numbers listed below.

This Notice explains the terms of the Settlement and your legal rights.

**2. What is the Settlement about?**

Plaintiffs filed proposed class claims against New GM in the MDL Court and the GUC Trust in the Bankruptcy Court claiming that consumers overpaid when they bought or leased GM vehicles that were subject to the recalls. New GM, the GUC Trust and the AAT deny these allegations. The Plaintiffs, New GM, the GUC Trust and the AAT (together the “Parties”) negotiated the Settlement to resolve these claims, as well as the economic loss claims for these recalls that have been or may be asserted by the Class against New GM, the GUC Trust, the AAT and certain other released parties (collectively with the Plaintiffs, the “Class Members”). The Settlement avoids the risk and cost of a trial and provides Settlement benefits to Class Members. The Plaintiffs and their attorneys think that the Settlement is in the best interests of all Class Members and that it is fair, reasonable, and adequate.

## B. WHO IS INCLUDED IN THE SETTLEMENT?

To be affected by the proposed Settlement, you have to be a Class Member.

### 3. How do I know if I am part of the Settlement? What is the definition of Class Members?

If you fall under one of the categories below, you may be a Class Member. The Class, which is for Settlement purposes only, is defined as:

All Persons who, at any time as of or before the Recall Announcement Date of the Recall(s) applicable to the Subject Vehicle, own(ed), purchase(d), and/or lease(d) a Subject Vehicle in any of the fifty States, the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, and all other United States territories and/or possessions.

The Class is comprised of the five Subclasses below (the “Subclasses”). If a Class Member owned and/or leased more than one Subject Vehicle, they may be in more than one subclass:

- Subclass 1: The Delta Ignition Switch Subclass, comprised of those Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to NHTSA Recall No. 14v047.
- Subclass 2: The Key Rotation Subclass, comprised of those Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to NHTSA Recall Nos. 14v355, 14v394, and 14v400.
- Subclass 3: The Camaro Knee-Key Subclass, comprised of those Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to NHTSA Recall No. 14v346.
- Subclass 4: The Electronic Power Steering Subclass, comprised of those Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to NHTSA Recall No. 14v153.
- Subclass 5: The Side Airbag Subclass, comprised of those Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to NHTSA Recall No. 14v118.

The Subject Vehicles are:

- a. “Production Part Recall 14v047 Vehicles,” which are those 2005-2007 Chevrolet Cobalt vehicles not also subject to Recall 14v153, those 2004-2007 Saturn Ion vehicles not also subject to Recall 14v153, 2006-2007 Chevrolet HHR vehicles, those 2007 Pontiac G5 vehicles not also subject to Recall 14v153, some 2005-2006 Pontiac Pursuit vehicles imported into the United States not also subject to Recall 14v153, 2007 Saturn Sky vehicles, 2003 Saturn Ion vehicles, and 2006-2007 Pontiac Solstice vehicles. The Recall Announcement Date for the Production Part Recall 14v047 Vehicles is February 28, 2014.

- b. “Production Part Recall 14v047 Vehicles also subject to Recall 14v153,” which are those 2005-2007 Chevrolet Cobalt vehicles subject to both Recalls, those 2007 Pontiac G5 vehicles subject to both Recalls, some 2004-2007 Saturn Ion vehicles, and some 2005-2006 Pontiac Pursuit vehicles imported into the United States subject to both Recalls. The Recall Announcement Date for the Production Part Recall 14v047 Vehicles also subject to Recall 14v153 is March 31, 2014.
- c. “Service Part Recall 14v047 Vehicles,” which are those 2008-2010 Chevrolet Cobalt vehicles not also subject to Recall 14v153, 2008 and 2011 Chevrolet HHR vehicles, those 2009-2010 Chevrolet HHR vehicles not also subject to Recall 14v153, those 2008-2010 Pontiac G5 vehicles imported into the United States not also subject to Recall 14v153, 2008-2010 Saturn Sky vehicles, and 2008-2010 Pontiac Solstice vehicles. The Recall Announcement Date for these Service Part Recall 14v047 Vehicles is March 31, 2014. Additionally, for 105 vehicles of various other makes, models and model years as identified by VINs provided by New GM for such Subject Vehicles to the Class Action Settlement Administrator, the Recall Announcement Date is August 31, 2014.
- d. “Service Part Recall 14v047 Vehicles also subject to Recall 14v153,” which are those 2008-2010 Chevrolet Cobalt vehicles subject to both Recalls, those 2009-2010 Chevrolet HHR vehicles subject to both Recalls, and those 2008-2010 Pontiac G5 vehicles imported into the United States subject to both Recalls. The Recall Announcement Date for the Service Part Recall 14v047 Vehicles also subject to Recall 14v153 is March 31, 2014.
- e. “Recall 14v346 Vehicles,” which are 2010-2014 Chevrolet Camaro vehicles. The Recall Announcement Date for the Recall 14v346 Vehicles is June 30, 2014.
- f. “Recall 14v355 Vehicles,” which are 2005-2009 Buick Lacrosse vehicles, 2000 and 2006-2013 Chevrolet Impala vehicles, 2014 Chevrolet Impala Limited vehicles, 2000-2005 Cadillac Deville vehicles, 2006-2011 Cadillac DTS vehicles, 2006-2011 Buick Lucerne vehicles, 2006-2007 Chevrolet Monte Carlo vehicles, 2005-2009 Buick Allure vehicles, 2004 Buick Regal vehicles, 2002-2009 Cadillac Commercial Chassis vehicles, and 2000-2011 Cadillac Professional Chassis vehicles. The Recall Announcement Date for the Recall 14v355 Vehicles is June 30, 2014.
- g. “Recall 14v394 Vehicles,” which are those 2003-2014 Cadillac CTS vehicles as identified by VINs provided by New GM for such Subject Vehicles to the Class Action Settlement Administrator, and those 2004-2006 Cadillac SRX as identified in the list of VINs provided by New GM for such Subject Vehicles to the Class Action Settlement Administrator, and 2004-2007 Cadillac CTS-V vehicles. The Recall Announcement Date for the Recall 14v394 Vehicles is July 31, 2014, except that the Recall

Announcement Date is August 31, 2014 for 2012-2014 Cadillac CTS vehicles and those 2011 Cadillac CTS vehicles as identified in the list of VINs provided by New GM for such Subject Vehicles to the Class Action Settlement Administrator.

- h. “Recall 14v400 Vehicles,” which are 1997-2003 Chevrolet Malibu vehicles, 2000-2005 Chevrolet Impala vehicles, 2000-2005 Chevrolet Monte Carlo vehicles, 2004-2005 Chevrolet Classic vehicles, 1999-2004 Oldsmobile Alero vehicles, 1998-2002 Oldsmobile Intrigue vehicles, 1999-2005 Pontiac Grand Am vehicles, and 2004-2008 Pontiac Grand Prix vehicles. The Recall Announcement Date for the Recall 14v400 Vehicles is July 31, 2014.
  
- i. “Recall 14v118 Vehicles,” which are those 2008-2009 Buick Enclave vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, 2010-2013 Buick Enclave vehicles, those 2009 Chevrolet Traverse vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, 2010-2013 Chevrolet Traverse vehicles, those 2008-2009 GMC Acadia vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, 2010-2013 GMC Acadia vehicles, and 2008-2010 Saturn Outlook vehicles. The Recall Announcement Date for the Recall 14v118 Vehicles is March 31, 2014.
  
- j. “Recall 14v153 Only Vehicles,” which are those 2004-2006 and 2008-2009 Chevrolet Malibu vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, the 2004-2005 Chevrolet Malibu Maxx, some 2006 Chevrolet Malibu Maxx vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, 2005 Pontiac G6 vehicles, those 2006 and 2008-2009 Pontiac G6 vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, those 2008-2009 Saturn Aura vehicles as identified in the list of VINs for such Subject Vehicles provided by New GM to the Class Action Settlement Administrator, those 2005-2006 Pontiac G4 vehicles imported into the United States, and those 2006 Pontiac G5 Pursuit vehicles imported into the United States. The Recall Announcement Date for the Recall 14v153 Only Vehicles is March 31, 2014.

## C. THE TERMS OF THE SETTLEMENT AGREEMENT

### 4. What am I giving up under the Settlement Agreement?

Under the proposed Settlement, each Class Member will be deemed to have waived, released, and promised not to sue for any economic loss claims that the Class Member have or may have in the future, directly or indirectly, against New GM, the GUC Trust, the AAT and certain other related parties (the “Released Parties”). However, Class Members will not waive or release any claims they may have against the Released Parties for personal injury, wrongful death or actual physical injury.

If approved by the Court, the Settlement will prohibit Class Members from suing or being part of any other lawsuit or claim against the Released Parties that relates to the subject matter of the Actions, the Recalls, the New GM MDL, or the Old GM Bankruptcy Case, including, but not limited to, those relating to the design, manufacturing, advertising, testing, marketing, functionality, servicing, sale, lease or resale of the Subject Vehicles (the “Released Claims”). The specifics of the Released Claims are set out in more detail in the Amended Settlement Agreement, which are posted at [www.GMIgnitionSwitchEconomicSettlement.com](http://www.GMIgnitionSwitchEconomicSettlement.com). The Amended Settlement Agreement describes the Released Claims in specific legal terminology.

Talk to your own lawyer if you have questions about the Released Claims or what it means.

### 5. What am I receiving under the Settlement Agreement?

The Settlement allows Class Members to submit claims to the Class Action Settlement Administrator, and, if eligible, receive a settlement payment from the Settlement claim, as described below.

#### A. The Settlement Amount

In exchange for Class Members’ release of the Released Claims, there will be a \$121.1 million settlement fund established (the “Settlement Amount”). Settlement payments to eligible Class Members will only occur if the Settlement Order becomes final and after settlement implementation costs (such as for claims administration) are deducted.

#### B. How will payments for eligible claims be allocated?

The Net Common Fund, which is the Settlement Amount less the costs of providing notice to the class and the expenses of administering the Settlement, will be exclusively used to provide payments to Class Members for eligible claims. To ensure that the Fund is fairly allocated, a Court-appointed mediator assessed the relative strength and value of the claims of each Subclass, with input from counsel separately representing each of those Subclasses. Based on that assessment, the mediator decided that members of two Subclasses with claims relating to the ignition switch (Delta Ignition Switch Subclass and Key Rotation Subclass) had relatively stronger claims than those of the other three subclasses. The amount of the payment will be greater, therefore, for eligible claims in those two Subclasses than in the other three subclasses (Camaro Knee-Key Subclass, Electronic Power Steering Subclass, and Side Airbag Subclass). Specifically, the Net Common Fund will be divided such that the payment for an eligible claim in the Delta Ignition Switch subclass will be twice the amount, and payment for an eligible claim in the Key Rotation Subclass be 1.5 times the amount, as the payment for an eligible claim in the other three Subclasses. (This allocation is reflected in a formula contained in the Settlement Claim

Review Protocol, Exhibit 10 to the Amended Settlement Agreement, and described in the Allocation Decision, Exhibit 2 to the Amended Settlement Agreement.) The actual dollar amounts for these payments are not yet known but will depend on how many eligible claims are submitted for each subclass and the amount of the Net Common Fund.

**C. How do I get a payment from the Net Common Fund?**

To make a claim and receive a payment, you need to file a claim form online or by mail postmarked by the deadline posted on the website, which will be no earlier than March 18, 2021. Claims may be submitted online at **www.GMIgnitionSwitchEconomicSettlement.com** or by mail to GM Ignition Switch Economic Settlement Claims Center c/o JND Legal Administration, P.O. Box 91354, Seattle, WA 98111. For certain Class Members, both a complete claim form and additional documentation may be required to establish eligibility. Instructions are on the claim form and on the Settlement Website. When required, sufficient documentation shall include an attestation signed under penalty of perjury when other documentation is no longer available.

**D. LEGAL REPRESENTATION**

**6. Do I have a lawyer in this case?**

The lawyers representing Plaintiffs (“Plaintiffs’ Class Counsel”), listed below, negotiated the Amended Settlement Agreement and jointly filed the Settlement Motion with New GM and the GUC Trust. You will not be charged for services performed by Plaintiffs’ Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

If you want to contact Plaintiffs’ Class Counsel, they can be reached by sending an email to **GMIgnitionswitch@hbsslaw.com** or as follows:

Steve W. Berman  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292

Elizabeth J. Cabraser  
LIEFF CABRASER HEIMANN & BERNSTEIN  
275 Battery Street, 29th Floor  
San Francisco, California 94111  
Telephone: (415) 956-1000

Co-Lead Counsel for the Economic Loss Plaintiffs in the District Court

**7. How will the lawyers be paid?**

Plaintiffs’ Class Counsel will ask the District Court, on behalf of all Plaintiffs’ counsel, for up to \$34.5 million in Attorneys’ Fees and Expenses. This application will need to be approved by the Court. New GM will pay up to a maximum amount of \$34.5 million in Attorneys’ Fees



and Expenses approved by the District Court. Under no circumstances shall New GM pay any amount in Attorneys' Fees and Expenses greater than \$34.5 million, and if the District Court awards less than \$34.5 million, then New GM shall pay only the lesser amount awarded by the Court. This amount is in addition to, and not deducted from, the \$121.1 million Settlement Amount described above.

**E. OPTING OUT OF THE SETTLEMENT**

**8. How do I opt out or exclude myself from the Settlement?**

If you do not want to be a member of the Class and you do not want to participate in the Settlement, you can exclude yourself from or opt out of the Class by sending a letter by mail to the Class Action Settlement Administrator. The opt out letter must include:

- a) Your full name, current address, and email;
- b) The name of this case: *In re: General Motors Ignition Switch*, Case No. 14-MD-2543 (JMF);
- c) The dates when you owned or leased the Subject Vehicle(s);
- d) The make, model, model year, and VIN of the Subject Vehicle(s);
- e) Your address(es) at the time you owned or leased the Subject Vehicle(s); and
- f) A clear statement that you want to be excluded from or opt out of the Class and the Settlement.

The exclusion letter must be signed and dated, and postmarked no later than **October 19, 2020**. You must mail your exclusion letter to:

*In re: General Motors Ignition Switch*, Case No. 14-MD-2543 (JMF)

GM Ignition Switch Economic Settlement Claims Center  
c/o JND Legal Administration  
P.O. Box 91355  
Seattle, WA 98111

**9. What happens if I exclude myself from the Class?**

If you exclude yourself from the Class, you will not get any money or benefits from this Settlement. By excluding yourself, however, you will retain your individual right to sue the Released Parties about the same claims alleged in this lawsuit, at your own expense.

**F. OBJECTING TO THE SETTLEMENT**

**10. How do I tell the District Court I do not like the Settlement?**

If you are a Class Member, and you do not exclude yourself from the Class, you can object to the proposed Settlement if you do not like it. You can give reasons why you think the Court should not approve any or all of these items, and the District Court will consider your views.

To object, you must mail your written objection to the District Court. To be timely, your objection must be postmarked by **October 19, 2020** and mailed to the following address:

<b>The District Court</b>	Clerk of Court Thurgood Marshall United States Courthouse
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	40 Centre Street New York, NY 10007
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See [www.GMIgnitionSwitchEconomicSettlement.com](http://www.GMIgnitionSwitchEconomicSettlement.com) for more information on how to object to the Settlement.

## **G. THE DISTRICT COURT'S SETTLEMENT APPROVAL HEARING**

### **11. When and where will the District Court decide whether to approve the Settlement?**

The District Court will hold a hearing to decide whether to approve the proposed Settlement. The hearing will be on **December 18, 2020, at 9:30 a.m. Eastern** before Judge Jesse M. Furman, Thurgood Marshall United States Courthouse, 40 Centre Street, New York, NY 10007, Courtroom 1105. Please note that the date of the hearing may be changed without notice other than an update on the Settlement Website. Class Members are encouraged to visit the Settlement Website at [www.GMIgnitionSwitchEconomicSettlement.com](http://www.GMIgnitionSwitchEconomicSettlement.com) for future updates.

At the hearing, the District Court will consider whether the proposed Settlement is fair, reasonable, and adequate, and whether it should be granted final approval. If there are objections, the District Court will consider them. The District Court may listen to people who have asked for permission to speak at the hearing and have complied with the other requirements for objections explained in paragraph 10.

At or after the hearing, the Court will decide whether to approve the proposed Settlement on a final basis. There may be appeals after that. There is no set timeline for either the Court's final approval decision, or for any appeals that may be brought from that decision, so it is impossible to know exactly when and if the Settlement will become final.

The Court may change deadlines listed in this Notice without further notice. To keep up on any changes in the deadlines, please visit [www.GMIgnitionSwitchEconomicSettlement.com](http://www.GMIgnitionSwitchEconomicSettlement.com).

### **12. Do I have to go to the hearing?**

No. Plaintiffs' Class Counsel will appear at the hearing in support of the Settlement and will answer any questions asked by the District Court. However, you are welcome to attend the hearing at your own expense.

If you send a written objection, you do not have to come to District Court to talk about it. So long as you mailed your written objection on time and complied with the other requirements for a proper objection, the District Court will consider it. You may attend or you may pay your own lawyer to attend, but it is not required.

### **13. May I speak at the hearing?**

Yes. If you submitted a proper written objection to the Settlement, you or your lawyer may, at your own expense, come to the hearing and speak.

**H. IF YOU DO NOTHING**

**14. What happens if I do nothing at all?**

You have the right to do nothing. If you do nothing, you will not get any Settlement benefits. In addition, you can no longer be part of a class action or any other lawsuits against the Released Parties involving the Released Claims in this Settlement. Specifically, upon Court approval, the Settlement will prohibit you from suing or being part of any other lawsuit or claim against the Released Parties that relate to the subject matter of the Actions, the Recalls, the New GM MDL, or the Old GM Bankruptcy Case, including, but not limited to, those relating to the design, manufacturing, advertising, testing, marketing, functionality, servicing, sale, lease or resale of the Subject Vehicles.

**I. GETTING MORE INFORMATION**

**15. How do I get more information about the Settlement?**

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Amended Settlement Agreement, the Settlement Order, and any additional orders entered by the District Court pertaining to the Settlement, all of which are available on the Settlement Website at **[www.GMignitionSwitchEconomicSettlement.com](http://www.GMignitionSwitchEconomicSettlement.com)**.

<b>YOU MAY OBTAIN ADDITIONAL INFORMATION BY:</b>	
<b>VISITING THE SETTLEMENT WEBSITE</b>	Please go to <b><a href="http://www.GMignitionSwitchEconomicSettlement.com">www.GMignitionSwitchEconomicSettlement.com</a></b> , where you will find answers to common questions and other detailed information to help you.
<b>REVIEWING LEGAL DOCUMENTS</b>	You can review the legal documents that have been filed with the Clerk of Court in these cases at: <p style="text-align: center;">Thurgood Marshall United States Courthouse 40 Centre Street New York, NY 10007</p> You can access the District Court dockets in these cases through the court documents and claims register website at <a href="http://www.motorsliquidationdocket.com/">http://www.motorsliquidationdocket.com/</a> or through the Court’s Public Access to Court Electronic Records (PACER) system at <a href="https://ecf.cand.uscourts.gov">https://ecf.cand.uscourts.gov</a> .

**PLEASE DO NOT CALL THE JUDGE OR THE COURT CLERK TO ASK QUESTIONS ABOUT THE LAWSUITS, THE SETTLEMENT, OR THIS NOTICE.**