

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

NOTICE OF PENDENCY OF CLASS ACTION

IF YOU PURCHASED OR LEASED A MODEL YEAR 2011-2014 CHEVROLET AVALANCHE, SILVERADO, SUBURBAN, OR TAHOE, OR A MODEL YEAR 2011-2014 GMC SIERRA, YUKON, OR YUKON XL VEHICLE EQUIPPED WITH A GENERATION IV LC9 5.3 LITER V8 VORTEC 5300 ENGINE, A CLASS ACTION MAY AFFECT YOUR RIGHTS

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

PLEASE READ THIS NOTICE CAREFULLY

This Notice explains that the Court certified a class action lawsuit and that your rights may be affected. The lawsuit alleges defects in certain 2011-2014 Chevrolet Avalanche, Silverado, Suburban, Tahoe, and GMC Sierra, Yukon, and Yukon XL vehicles equipped with Generation IV LC9 5.3 Liter V8 Vortec 5300 engines (“LC9 Engines”). The lawsuit is pending in federal court in Denver, Colorado (the “Court”). The purpose of this Notice is to inform you about how the lawsuit may affect your rights and what steps you may take. This Notice is not an expression by the Court of any opinion as to the merits of any of the claims or defenses asserted by either side in this lawsuit.

This Notice provides a summary of the lawsuit. It also describes who is eligible to be included in the Class, the effect of participating in this lawsuit as a class member, and how to request exclusion from the Class.

Your legal rights and options in this lawsuit are summarized below.

LEGAL RIGHTS AND OPTIONS	
ASK TO BE EXCLUDED BY APRIL 5, 2024	<p>If you do not want to participate in the Class, you can exclude yourself by mailing a request for exclusion by April 5, 2024. This is the only option that allows you to retain any rights you may have against GM over the claims in this case. You must send your written request for exclusion to the address listed below:</p> <p style="text-align: center;">GM 5300 LC9 Colorado Class Action P.O. Box 3314 Baton Rouge, LA 70821</p> <p>If you decide you do not want to participate in the Class and you do <u>not</u> make a timely request for exclusion as described above, you will still be bound by the jury’s verdict, should the case go to trial.</p>
DO NOTHING AT THIS TIME	<p>If you wish to remain in the class, you do not need to do anything at this time.</p>

Any questions? visit www.ColoradoGMengineLitigation.com or call 1-844-904-4525.

Any questions? Read below or visit www.ColoradoGMenginelitigation.com.

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1. Why is there a Notice?

This Notice explains that the Court has allowed or “certified” a class action lawsuit that may affect your rights. This Notice informs you of the nature of the litigation and describes your rights and options. Judge Charlotte N. Sweeney of the United States District Court for the District of Colorado is overseeing this lawsuit. The lawsuit is known as *White. v. General Motors, LLC*, and the case number is 1:21-cv-00410-CNS-MEH. If you receive a notice in the mail, records of state department of motor vehicles show that you may have purchased or leased a Class Vehicle in Colorado.

The “Class Vehicles” are: 2011-2014 Chevrolet Avalanches; 2011-2014 Chevrolet Silverados; 2011-2014 Chevrolet Suburbans; 2011-2014 Chevrolet Tahoes; 2011-2014 GMC Sierras; 2011-2014 GMC Yukons; and the 2011-2014 GMC Yukon XLs with LC9 engines and manufactured on or after February 10, 2011. Any vehicle that has received free upgraded piston rings under warranty is excluded from the class.

2. What is this lawsuit about?

Plaintiff alleges that the LC9 Engines in the Class Vehicles contain an inherently defective piston assembly, and that the defect is manifest in every Class Vehicle causing excessive engine wear. Plaintiff alleges that excessively worn piston rings may lead to excessive oil consumption, which causes spark plug

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fouling, rough idling, rough acceleration, check engine light activation, engine shutdown commands from the instrument cluster, oil loss/burn and may eventually lead to permanent engine damage or shutdown.

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

A trial has not yet been scheduled in the case. During the trial, the jury will hear all of the evidence and will reach a decision about whether Plaintiff has proven the merits of the Class's claims. There is no guarantee that the Plaintiff will win or that there will be any relief for the Class.

You do not need to attend the trial. Plaintiff's counsel and the Class Representative will present the Plaintiff's case for the Class, and GM will present its defenses. You or your own lawyer are free to attend the trial at your own expense.

3. What is a class action and who is involved?

In a class action lawsuit, people called the "Class Representatives" sue on behalf of themselves and other people who have similar claims. All of the people together are called a "Class" or "Class Members." The company the Class Representatives have sued (in this case GM) is called the Defendant. One court resolves the issues for everyone in the Class, except for those people who choose to exclude themselves from the Class.

4. Why is this lawsuit a class action?

The Court decided that the Class Representative's claim for breach of implied warranty of merchantability against GM can proceed as a class action because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts.

5. Am I in a Class?

The Class is defined as follows:

- All purchasers and lessees of a 2011-2014 Chevrolet Avalanche, 2011-2014 Chevrolet Silverado, 2011-2014 Chevrolet Suburban, 2011-2014 Chevrolet Tahoe, 2011-2014 GMC Sierra, 2011-2014 GMC Yukon, and 2011-2014 GMC Yukon XL manufactured on or after February 10, 2011 that was equipped with a Generation IV 5.3-Liter V8 Vortec 5300 LC9 engine that was purchased or leased in the State of Colorado.

Excluded from the Class are: (1) all federal court judges who have presided over this case and any members of their immediate families; (2) all entities and natural persons that have litigated claims involving Class Vehicles against GM to final judgment; (3) all entities and natural persons who, via a settlement or otherwise, delivered to GM releases of their claims involving Class Vehicles; (4) GM's employees, officers, directors, agents, and representatives, and their family members; and (5) all entities and natural persons who submit a valid request for exclusion following this Notice of Pendency of Class Action in this litigation.

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

If you are still not sure whether you are a member of the Class, you can call or write to Class Counsel at the phone numbers or addresses listed below. Do not call the Court.

Any questions? visit www.ColoradoGMengine litigation.com or call 1-844-904-4525.

**You must decide whether to stay in the Class, ask to be excluded, or opt out of the Class.
You have until April 5, 2024 to exclude yourself.**

7. How do I participate in this class action?

If you fall within the definition of the Class described above, you are a Class Member. As a Class Member, you will be bound by any judgment or settlement, whether favorable or unfavorable, in this lawsuit, and will be able to participate in any relief obtained by the Plaintiff on behalf of the Class. Whether Plaintiff wins or loses, you will not be able to bring individual legal claims against GM based on the same legal theories certified for class treatment in this case, nor will you be able to obtain any relief in connection with such claims, other than the relief obtained by the Class. You will also be bound if judgment is rendered in favor of GM.

IF YOU WISH TO REMAIN A CLASS MEMBER, YOU DO NOT NEED TO DO ANYTHING

By doing nothing, you will remain part of the case and you will give up your rights to sue GM separately about the same legal claims involved in this action. No judgment or settlement has occurred at this time. If you do not ask to be excluded from the Class now, you will not have the right to seek exclusion later, such as at the time of settlement or judgment. However, in the event of a settlement, as a Class Member, you will have an opportunity to present an objection to the Court if you disagree with the terms of the settlement. If you stay in the Class and Plaintiff obtains benefits for the Class Members, either as a result of the trial or a settlement, you will be notified about how to apply for benefits.

8. Why would I ask to be excluded?

You may want to exclude yourself if you do not want to participate in this litigation at all. If you exclude yourself from the Class—which means to remove yourself from the Class, and is sometimes called “opting out” of the Class—you will not get any benefits from this litigation.

If your exclusion request is complete and properly submitted before the deadline, you will not be bound by the outcome of the litigation, and you will be free, if you choose, to pursue your own lawsuit against GM based on malfunctions of the same alleged vehicle defect. Any separate litigation you choose to bring may be subject to a statute of limitations, or other time-sensitive requirements.

9. How do I ask the Court to exclude me from the Class?

If you wish to be excluded from the Class and retain all your rights, you must complete an Exclusion Request Form, available at www.ColoradoGMengine litigation.com and submit it by U.S. Mail by **April 5, 2024**. Be sure to sign the form and complete all required information. You must send your Exclusion Request Form to the address listed below:

GM 5300 LC9 Colorado Class Action
P.O. Box 3314
Baton Rouge, LA 70821

IF YOU CHOOSE TO BE EXCLUDED: (1) you will NOT be entitled to share in any relief from any settlement or judgment that results from this lawsuit; (2) you will NOT be bound by any

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judgment or settlement release entered in this lawsuit; and (3) at your own expense, you MAY pursue any claims that you have by filing separate litigation.

Only request exclusion if you do NOT wish to participate in this litigation and do NOT wish to share in any potential benefits that might be obtained on behalf of the Class in this lawsuit.

THE ATTORNEYS REPRESENTING YOU

10. Do I have an attorney in this case?

Adam J. Levitt, John Tangren, and Daniel Ferri of DiCello Levitt LLP and W. Daniel “Dee” Miles, III, H. Clay Barnett, III, and Mitch Williams of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. represent the Class and Class Members in the litigation.

11. Should I get my own attorney?

You may make an appearance in the case through another attorney if you choose. If you wish to remain a Class Member, you do not need to hire your own lawyer because Class Counsel is working on your behalf. If you wish to pursue your own lawsuit separate from this one, you will need to submit a request for exclusion.

THE ATTORNEYS REPRESENTING YOU

12. How do I get more information?

This Notice summarizes the Class and the nature of the litigation. For more information on the Class and the litigation, you may contact Class Counsel or the Notice Administrator using the contact information below. You may also access the Court’s docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cod.uscourts.gov>; or by visiting the office of the Clerk of the Court for the United States District Court for District of Colorado, 901 19th Street, Denver, CO 80294, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

Court-Appointed Class Counsel

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

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