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 and SAMANTHA PECKERAR, on behalf of
 16 themselves and all others similarly situated

17 *(Additional Attorneys Listed on Signature Page)*

18
 19 **UNITED STATES DISTRICT COURT**
 20 **CENTRAL DISTRICT OF CALIFORNIA, EASTERN DIVISION**

21 SCOTT PECKERAR and SAMANTHA
 22 PECKERAR, on behalf of themselves
 and all others similarly situated,

23 Plaintiffs,

24 v.

26 GENERAL MOTORS LLC,

27 Defendant.
 28

Case No.: 5:18-cv-02153-DMG-SP

CLASS ACTION

**SECOND AMENDED CLASS
 ACTION COMPLAINT FOR:**

**(1) VIOLATIONS OF THE
 CALIFORNIA CONSUMERS
 LEGAL REMEDIES ACT (“CLRA”
 (CAL. CIV. CODE §§ 1750, et seq.)**

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(2) VIOLATION OF THE CALIFORNIA UNFAIR COMPETITION LAW (CAL. BUS. & PROF. CODE §§ 17200, *et seq.*)

(3) VIOLATION OF THE SONG-BEVERLY CONSUMER WARRANTY ACT BREACH OF IMPLIED WARRANTY (CAL. CIV. CODE §§ 1791, *et seq.*)

DEMAND FOR JURY TRIAL

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 FIRST CAUSE OF ACTION
 (Violation of the Consumers Legal Remedies Act) 40

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1 Plaintiffs SCOTT PECKERAR and SAMANTHA PECKERAR, on behalf of
2 themselves and all others similarly situated allege as follows upon personal
3 knowledge as to Plaintiffs’ own conduct and on information and belief as to all other
4 matters based on an investigation by counsel, such that each allegation has
5 evidentiary support or is likely to have evidentiary support upon further
6 investigation and discovery:

7 **I. NATURE OF THE ACTION**

8 1. Plaintiffs bring claims under the consumer protection laws of California
9 against Defendant GENERAL MOTORS LLC (“GM”).

10 2. This action arises from the sale or lease of thousands of vehicles
11 throughout California manufactured by Defendant GM that are equipped with
12 defective braking systems. These defective braking systems were installed in all
13 model year 2015 to present Cadillac Escalades, 2014 to present Chevrolet
14 Silverados, 2015 to present Chevrolet Suburbans, 2015 to present Chevrolet Tahoes,
15 2014 to present GMC Sierras, and 2015 to present GMC Yukon/Yukon XLs (the
16 “**Class Vehicles**”) and sold or leased to consumers in California, including
17 Plaintiffs. All Class Vehicles share the same “K2XX” platform, architecture, and
18 mechanical parts, including the defective condition of the braking system that GM
19 failed to disclose to Plaintiffs, consumers, and each member of the putative class.

20 3. The irreparable and defective braking system supplied in all of the
21 Class Vehicles features a defective design that is prone to sudden and unexpected
22 loss of vacuum in the brake booster, requiring replacement of the brake booster
23 and/or the system’s vacuum assist pump. When Class Vehicles suddenly and
24 unexpectedly lose vacuum, the resulting brake booster failure makes Class Vehicles
25 difficult to stop: the brake pedal becomes hard, much more force is required from
26 the driver to slow the vehicle, and stopping distance is severely and suddenly
27 compromised. The defective braking system common to all Class Vehicles is a clear
28 safety hazard that was never disclosed to any member of the class prior to purchase.

1 This hazard present in all Class Vehicles is hereinafter referred to as the “**Class**
2 **Defect.**” Failure of the vacuum pump as a result of the Class Defect requires
3 replacement of the vacuum pump to restore brake boost to the driver. Occasionally,
4 vacuum pump failure also leads to the presence of engine oil in the vacuum line
5 connected to the brake booster, or in the brake booster itself; in these instances,
6 replacement of the brake booster is required in addition to replacement of the
7 vacuum pump.

8 4. Reasonable efforts undertaken by the Class to remedy this defect with
9 or through GM have been unsuccessful.

10 5. GM sold, leased, and continues to sell and lease the Class Vehicles
11 despite its awareness of the defect and the danger it poses to consumers and other
12 drivers. GM chose and continues to choose financial gain at the expense of
13 consumer safety by concealing and omitting a disclosure of this critical safety defect
14 to consumers who purchase or lease Class Vehicles.

15 6. GM has been aware of the safety hazard posed by its defective braking
16 system since at least 2014. GM should not have sold, leased, or marketed the Class
17 Vehicles without a full and complete disclosure of the Class Vehicles’ safety defect,
18 and should have voluntarily recalled the Class Vehicles long ago.

19 7. Plaintiffs bring this action on behalf of themselves and all those
20 similarly situated (“Class,” “Class Members,” “Consumers,” “Owners”) for GM’s
21 deceptive trade practices in violation of the consumer protection laws of California.
22 Plaintiffs seek damages, attorney’s fees and costs, punitive damages, and the repair
23 of, replacement of, or refund of money paid to own or lease all Class Vehicles in
24 California, and any other legal relief available for their claims. Should Plaintiffs’
25 demanded legal relief be unavailable or prove insufficient, Plaintiffs seek
26 appropriate equitable and injunctive relief in the alternative pursuant to Fed. R. Civ.
27 P. 8(a)(3).

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1 **II. JURISDICTION AND VENUE**

2 8. Pursuant to 28 U.S.C. § 1332(d)(2), this Court has original jurisdiction
3 over the Plaintiffs’ and the Class Members’ claims in that diversity of citizenship
4 exists and Plaintiffs seek to represent a Class of persons in a matter in controversy
5 that exceeds the sum or value of \$5,000,000, exclusive of interest and costs.

6 9. This Court has general and specific jurisdiction over the Defendant
7 because Defendant GM has sufficient minimum contacts with California and within
8 the Central District of California to establish Defendant’s presence in California,
9 and certain material acts upon which this suit is based occurred within the Central
10 District of California, to include but not be limited to the sale of the Defendant’s
11 defective product to the Plaintiffs.

12 10. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)
13 because Defendant is subject to personal jurisdiction within the Central District of
14 California and a substantial part of the events or omissions giving rise to the claims
15 asserted herein occurred in this judicial district. GM does substantial business in the
16 State of California and within this Judicial District, is registered to and is doing
17 business within the State of California, and otherwise maintains requisite minimum
18 contacts with the State of California. Additionally, GM distributes Class Vehicles in
19 this District and receives substantial compensation and profits from the sale and
20 lease of Class Vehicles in this District, and has and continues to conceal and make
21 material omissions in this District so as to subject it to *in personam* jurisdiction in
22 this District. Furthermore, venue is proper in this District because, like many other
23 Class Members, significant and material aspects of the transactions relating to
24 Plaintiffs’ purchase of their Class Vehicle occurred within and were otherwise
25 connected to this Judicial District.

26 **III. PARTIES**

27 11. Plaintiffs Scott Peckerar and Samantha Peckerar are adult citizens and
28 reside in this judicial district and division.

1 12. Defendant GENERAL MOTORS LLC is a Delaware limited liability
2 company whose principal place of business is in the State of Michigan. On
3 information and belief, none of General Motors LLC’s members have citizenship in
4 the state of California. Defendant GM manufactured, distributed, sold, serviced
5 and/or warranted the Class Vehicles made the subject of this litigation. GM
6 distributed, sold, serviced and/or warranted, directly or indirectly, thousands of
7 Class Vehicles to Plaintiffs and the Class Members with the understanding and
8 expectation that those vehicles would be sold in, operate in, and be fit for their
9 intended purpose in California.

10 **IV. FACTUAL BACKGROUND**

11 **A. Plaintiffs Purchased a Defective Class Vehicle.**

12 13. On or about January 18, 2017, Plaintiffs purchased a new 2017 model
13 year Chevrolet Suburban at a franchised General Motors dealership, Paradise
14 Chevrolet, located in Riverside County, California. Plaintiffs executed all sales
15 documents in Riverside County, California.

16 14. Prior to their purchase, Scott and Samantha Peckerar sat in the
17 Suburban and fully explored its interior features. Both Plaintiffs read the window
18 sticker.

19 15. Prior to Purchase, Scott Peckerar test drove the Suburban and its brakes
20 slowed and stopped the vehicle with success. The salesman was unfamiliar with all
21 of the safety features Scott viewed on the window sticker, so Scott Peckerar read
22 through the Suburban’s owner’s manual to understand its safety features and other
23 functions in detail, such as the vehicle’s automatic high-beams and onboard Wi-Fi.
24 A salesman instructed Scott Peckerar on the vehicle’s interior features and
25 entertainment system prior to purchase, and assisted him in testing the vehicle’s
26 Low-Speed Forward Automatic Braking system to understand whether the system
27 functioned according to his understanding gained from his internet research.

28 ///

1 16. Despite the Plaintiffs' thorough review of GM's website which
2 described the Suburban and its safety features, and the vehicle's printed safety
3 literature prior to their purchase, Defendants' written and verbal communications
4 never informed Plaintiffs of the latent Class Defect in the Suburban's braking
5 system. Had GM provided a disclosure of the Class Defect to Plaintiffs at the point
6 of sale, Plaintiffs would have viewed the omitted disclosure and would have not
7 purchased the Suburban or paid as much for it as they did.

8 17. On April 11, 2017, Paradise Chevrolet was performing maintenance on
9 Plaintiffs' Suburban at 7,113 miles and found a leak of engine oil. Paradise
10 Chevrolet diagnosed the vehicle with a failed vacuum pump. The Repair Order
11 stated: "VERIFIED ENGINE OIL LEAK PRESENT AT ENGINE VACUUM
12 PUMP. LEAK CAUSED BY FAILING SHAFT SEAL ON VACUUM PUMP.
13 NECESSARY TO REPLACE VACUUM PUMP ASSEMBLY TO REPAIR.
14 REPLACED VACUUM PUMP ASSEMBLY AND ASSOCIATED GASKETS
15 AND HARDWARE."

16 18. On April 11, 2017, Plaintiffs' Suburban was still covered by GM's
17 express bumper-to-bumper limited warranty, and Plaintiffs had owned the vehicle
18 for less than one year. The original repair for the Suburban's vacuum pump was
19 replaced under warranty, but the fix failed to remedy the defect in the vehicle's
20 braking system.

21 19. On April 5, 2018, Plaintiff Samantha Peckerar was driving the
22 Suburban and experienced a startling issue with her brakes. She pressed her brake
23 pedal but the pedal became hard and prevented her from stopping her vehicle,
24 resulting in a collision with the vehicle in front of her.

25 20. Concerned for the safety of their family, Plaintiffs informed GM about
26 the braking problem with their Suburban.

27 21. General Motors sent an investigator to visit the Plaintiffs home and
28 inspect the Plaintiffs' Suburban. GM's representatives told Plaintiffs that no

1 electronic data retrieved from the vehicle evidenced a defect. GM’s representatives
2 also told Plaintiff Samantha Peckerar that she should consult her manual to
3 understand the operation of her Suburban’s brakes. Despite Plaintiffs’ insistence,
4 GM refused to do any kind of field testing of the vehicle or otherwise evaluate it for
5 safety under driving conditions. Instead, GM attempted to induce Plaintiffs into
6 signing a release for any claims of liability against GM or its franchised dealerships,
7 including a promise of confidentiality, in exchange for the cost of repair to the
8 Suburban’s front bumper.

9 22. Plaintiffs were unsatisfied by GM’s refusal to diagnose the brake
10 failure that caused the collision and brought the vehicle to Paradise Chevrolet for
11 further inspection. Unlike GM’s corporate representatives, the GM dealership drove
12 the vehicle to confirm what Plaintiffs already knew—there was a problem with the
13 Suburban’s brakes.

14 23. Paradise Chevrolet test drove the Suburban and discovered that the
15 Suburban failed to maintain vacuum boost. The Repair Order stated: “BODY SHOP
16 ADVISED THAT AFTER APPLYING AND RELEASING THE BRAKE PEDAL
17 AND THEN RE-APPLYING IMMEDIATELY AFTER FOR PANIC STOP THAT
18 BRAKE PEDAL FELT HARD AND VEHICLE DID NOT STOP AS DESIGNED.
19 ... DROVE VEHICLE VERIFIED AFTER SECOND OR THIRD BRAKE
20 APPLICATION THAT THE PEDAL GETS HARD AND THE BRAKE ASSIST
21 FAILS TO PROVIDE ASSIST.”

22 24. The cause of the collision was confirmed to be a *second in-warranty*
23 *failure* of the vacuum pump, demonstrating that GM’s supposed fix for the Class
24 Defect is ineffective and dangerous. The Repair Order states: “SLOW TO BUILD
25 VACUUM BACK UP, REC VACUUM PUMP REPLACEMENT AND RETEST.
26 ... ALSO SCAN TEST FOUND Code C025E brake booster sensor circuit/not
27 plausible stored in the EBCM. ... Verified with GM technical assistance code
28 C025E 5A is related to low vacuum. ... REPLACED VACUUM PUMP

1 ASSEMBLY. CLEARED CODE.”

2 25. After filing their First Amended Complaint, Plaintiffs have now
3 experienced a *third instance* of a loss of vacuum brake boost. While driving with
4 his young son, Scott Peckerar passed through a crosswalk and illegally entered an
5 intersection despite his best efforts to slow his vehicle. Scott Peckerar presented his
6 vehicle to an authorized GM dealership on July 27, 2019. The technicians noted a
7 degradation of vacuum boost during testing, but found that the test results were not
8 sufficient for GM to replace his vacuum pump for the third time. The technicians
9 also noted that the vacuum pump was already twice “replaced with updated parts.”

10 26. The Peckerars’ family vehicle remains unrepaired and dangerous.

11 **B. Defendant GM Knowingly Sold Dangerously Defective Vehicles to**
12 **Consumers.**

13 27. In fact, Plaintiffs’ dealership had been familiar with the Class Defect
14 for at least three years when it repaired and replaced the vacuum pump in Plaintiffs’
15 Suburban for the second time. In February of 2015, Defendant GM issued technical
16 service bulletin #PIT5361 to all of its franchised dealerships. This bulletin affected
17 the Class Vehicles produced to date at the time: 2015 Cadillac Escalade; 2014-2015
18 Chevrolet Silverado 1500; 2015 Chevrolet Suburban; 2015 Chevrolet Tahoe; 2014-
19 2015 GMC Sierra 1500; and 2015 Yukon. (Exhibit A.)

20 28. In the bulletin, GM expressly acknowledged that “a customer may
21 comment on a hard brake pedal or that increased effort is needed to depress the
22 brake pedal.” As evidence of the Class Defect, Defendant GM notified its dealers,
23 “While performing normal diagnostics, fluid *may* be found in the brake booster
24 and/or the booster vacuum line.” (Emphasis added). The service bulletin was
25 “intended for use by professional technicians ... written to inform these technicians
26 of conditions that may occur on some vehicles.” The service bulletin was not,
27 however, written or intended for the consuming public, including Plaintiffs and any
28 Class Members.

1 29. Since the release of the Class Vehicles (the earliest of which was
2 Spring 2013), Defendant GM has received numerous warranty returns, customer
3 complaints, and National Highway Traffic Safety Administration “Vehicle Owner
4 Questionnaires” (“NHTSA VOQs”) relating to the defect.

5 30. As a result, GM investigated the defect, developed a countermeasure
6 (attempted fix), and then cascaded the countermeasure into the field through its
7 dealerships in the form of a service bulletin effective February 2015. The service
8 bulletin requires extensive repair to include the replacement of the Vacuum Pump,
9 Vacuum Line Between the booster and the pump, Brake Booster, and Master
10 Cylinder. (Exhibit A).

11 31. The service campaign process does not happen overnight, especially for
12 a repair as extensive as the February 2015 service campaign; it takes many months
13 to identify the problem, attempt to fix it, and implement the fix in the field. GM
14 knew their Class Vehicles suffered from the Class Defect well before Plaintiffs
15 purchased their 2017 Chevrolet Suburban, but GM concealed the defect from
16 unwitting consumers who unknowingly purchased Class Vehicles with a hidden
17 defect.

18 32. Ultimately, Defendant GM issued a series of service bulletins only to
19 its dealers regarding the brake defect, including bulletins for the following Class
20 Vehicles and year models: 2015-2016 Cadillac Escalade; 2014-2016 Chevrolet
21 Silverado 1500; 2015-2016 Chevrolet Suburban; 2015-2016 Chevrolet Tahoe; 2014-
22 2016 GMC Sierra 1500; and 2015-2016 Yukon. (*See* Exhibit A.) As part of GM’s
23 overall strategy to engage in material omission and deception upon Plaintiffs and the
24 Class Members, these bulletins contain false, misleading, or deceptive information
25 about the potential for curing the defects because the purported repairs do not fix the
26 defect and the statements are designed to mislead dealers and technicians who repair
27 Class Vehicles. For instance, GM’s bulletins continue to downplay the severity and
28 risk of the Class Defect, categorizing a loss of braking ability as a “rare situation[.]”

1 when in fact General Motors is aware through its warranty rates and consumer
2 complaints (including NHTSA VOQs) that manifestations of the Class Defect are
3 both much more prevalent *and* much more dangerous than other defects in its
4 vehicles.

5 33. Defendant GM had knowledge of the Class Defect prior to the sale of
6 the Class Vehicle to Plaintiffs. Further, Defendant GM took no action to alert
7 Plaintiffs or the Class Members of the defect in the Class Vehicles prior to their
8 purchase or after their purchase.

9 34. As of February 10, 2016, GM had verified at least some 19 affected
10 vehicle models where the “CUSTOMER WILL NEED INCREASED EFFORT TO
11 DEPRESS THE BRAKE PEDAL. TECHNICIAN MAY FIND FLUID IN THE
12 BRAKE BOOSTER AND/OR THE BOOSTER LINE. TECHNICIAN WILL
13 NEED TO REPLACE VACUUM PUMP, BRAKE BOOSTER, MASTER
14 CYLINDER, VACUUM PUMP BELT AND VACUUM LINE BETWEEN THE
15 BOOSTER AND THE PUMP.” (*See Exhibit B.*) The 19 affected vehicle models are
16 the Class Vehicles which GM continued to sell without disclosure to the Class
17 Members even after this admission.

18 35. Disturbingly, the number of customer complaints echoed what GM
19 already knew about its defective brake system: the need for increased effort to
20 depress brake pedal, high occurrences in stop and go traffic, high occurrences of
21 failure at lower speeds, brake booster issue, replacement of brake booster,
22 replacement of master cylinder, safety issue, etc. (*See Exhibit C.*)

23 36. Further, Defendant GM knowingly sold thousands of Class Vehicles to
24 unsuspecting Class Members to whom GM said nothing about the braking defect
25 after its knowledge of the Class Defect.

26 37. In March of 2017, GM became aware that a 2015 Chevrolet Suburban
27 in Arkansas had been involved in an accident caused by a brake failure almost
28 identical to the failure experienced by Plaintiff. In GM’s investigation of that crash,

1 GM confirmed that the collision was the result of a brake failure caused by a loss of
2 vacuum in the brake booster. *See* (Exhibit D). Months before Plaintiff purchased his
3 Class Vehicle, GM was therefore aware of the defect and aware of another crash
4 caused by that defect. Still, Defendant provided no notification of the defect or any
5 other warning to Plaintiffs or Class Members.

6 38. Similarly, GM was fully aware of another crash occurring in April of
7 2018 in California involving the same braking system in a GM vehicle, and wherein
8 GM's dealership confirmed the crash was caused by the Class Defect as described in
9 GM's service bulletins to dealers. Still, GM failed to provide any notification of the
10 defect or other warning to Plaintiff or the Class.

11 39. On September 13, 2018, GM released a new version of the PIT5361
12 TSB, revision "D." *See* [https://static.nhtsa.gov/odi/tsbs/2018/MC-10145479-](https://static.nhtsa.gov/odi/tsbs/2018/MC-10145479-9999.pdf)
13 [9999.pdf](https://static.nhtsa.gov/odi/tsbs/2018/MC-10145479-9999.pdf). (Exhibit E). The newest version of the vacuum pump TSB supersedes
14 earlier versions issued to dealerships, and extends the same diagnosis of Class
15 Vehicles through model years 2017, 2018, and 2019 vehicles. This late-2018 version
16 of the TSB still describes the same conditions of a hard brake pedal, increased effort
17 to stop a vehicle, and a failed vacuum pump and brake booster. As evidenced by
18 PIT5361 Revision D, all Class Vehicles share the same Class Defect.

19 40. NHTSA has now opened its own investigation of the defect.
20 Investigation "PE 18-012" was opened on November 20, 2018 and confirms that the
21 "Office of Defects Investigation (ODI) has received 111 reports of hard brake pedal
22 effort accompanied by extended stopping distance in model years (MY) 2014 to
23 2016 General Motors (GM) light trucks based on the K2XX platform," all of which
24 are Class Vehicles. *See* [https://static.nhtsa.gov/odi/inv/2018/INOA-PE18012-](https://static.nhtsa.gov/odi/inv/2018/INOA-PE18012-2065.PDF)
25 [2065.PDF](https://static.nhtsa.gov/odi/inv/2018/INOA-PE18012-2065.PDF). (Exhibit F). "These conditions are attributed to deterioration of the
26 engine-driven brake assist vacuum pump. Nine of these incidents included vehicles
27 incurring damage as a result colliding with another vehicle or fixed object at low
28 speeds." *Id.* On February 7, 2019, NHTSA requested documents from GM in

1 support of its investigation to be produced by March 27, 2019, and noted that the
2 ODI has received “487 reports of brake vacuum assist pump failures” in Class
3 Vehicles. See <https://static.nhtsa.gov/odi/inv/2018/INIM-PE18012-74378.pdf>.
4 (Exhibit G).

5 41. Following a similar investigation by Transport Canada, GM recently
6 **issued a recall** of over 300,000 2014 to 2017 model year F2XX platform trucks and
7 SUVs sold in Canada as a result of the Class Defect. To date, GM has refused to
8 issue a recall for millions of Class Vehicles sold in the United States with the same
9 Class Defect.

10 42. Defendant GM knowingly sold thousands of Class Vehicles to
11 unsuspecting Class Members to whom GM said nothing about the braking defect
12 despite having knowledge of the Class Defect. Five years on, GM has not issued a
13 permanent fix, but continues to sell millions of Class Vehicles while omitting
14 disclosure of the dangerous defect within.

15 43. GM’s own service bulletins exemplify the type of language that could
16 have been provided to Plaintiff and the Class notifying them of the existence of the
17 defect, how the defect presents itself to the consumer, the cause of the defect, and
18 GM’s purported repairs to fix the defect. Such detailed information is the very type
19 of information that Plaintiffs contend amounts to a material omission and should
20 have been disclosed to Plaintiffs and the Class members prior to or at the time of
21 sale of each vehicle. Accordingly, the author (GM) and contents of the service
22 bulletin attached as Exhibit E evidence the who, what, when, where, and why of
23 GM’s omissions and how such statements could have been provided to each Class
24 Member prior to their purchase of a Class Vehicle.

25 44. Furthermore, the summary of the Class Defect contained in the NHTSA
26 ODI RESUME at Exhibit F was derived from information provided by GM or
27 otherwise equally available to GM; this summary further evidences the kind of
28 disclosure that should have been made to Plaintiff and consumers prior to purchase:

1 The brake assist vacuum pump is driven by an accessory belt on the
2 engine and serves as the source of power brake vacuum in the subject
3 vehicles. Over time, the pump's capacity to generate vacuum may
4 deteriorate. The subject vehicles receive supplemental hydraulic brake
5 assist from the ABS system, albeit at lower levels than the vacuum
6 powered primary system. If the brake assist vacuum pump fails to
7 operate as intended, the amount of brake power assist supplied to the
8 driver can be significantly reduced, extending the subject vehicle
9 stopping distance.

10 45. General Motors had a duty to make such a disclosure and inform
11 Plaintiff and the Class about the safety hazard posed by the Class Defect, whether
12 through its agents (certified GM dealerships subject to its Dealer Agreements, such
13 as Plaintiffs' dealership) or through its own warnings affixed to the vehicle at the
14 point of sale. GM already includes several information disclosures in its vehicles
15 from the factory, including the vehicles' "Monroney" window sticker, as well as
16 permanent warnings regarding other safety features (such as airbags) on graphical
17 warnings throughout the cabin, such as behind a sunvisor. GM also already provides
18 detailed information about safety systems and safety hazards in its vehicles' owners'
19 manuals.

20 46. Because General Motors sold Class Vehicles, including Plaintiffs'
21 vehicle, with an irreparable safety hazard in the braking system, GM had a duty to
22 include a permanent affixed warning of that hazard from the factory. GM should
23 have included the material information from Exhibit F in a visible, attention-
24 grabbing, and permanent warning on the vehicle's dashboard visible from the
25 driver's seat; on a window sticker from the factory; and at the beginning of the Class
26 Vehicles' owners' manual. Instead, General Motors continues its omission of an
27 adequate disclosure in *all* of its communications with consumers at the point of sale.

28 **C. Consumers Have Extensively Reported the Safety Hazard to GM.**

47. The National Highway Traffic Safety Administration ("NHTSA")
provides a system for motor vehicle owners to report complaints relating to safety

1 defects that pose a risk of accidents in vehicles manufactured or imported in the
2 United States, including safety defects relating to brake malfunctions. The safety
3 defect complaints are entered into the NHTSA consumer complaint automated
4 database, which is accessible to manufacturers and are routinely reviewed by GM
5 soon after the submission of each complaint. NHTSA also provides these consumer
6 complaints to the vehicle manufacturers directly, including GM. Given the vast
7 majority of owners of Class Vehicles are not aware of NHTSA and/or its reporting
8 system, complaints received by NHTSA form an extremely small minority of the
9 overall number of complaints which have been made to GM directly and/or through
10 its authorized dealerships, including through the form of warranty repairs.

11 48. Since at least 2014, GM has received complaints of braking defects and
12 safety concerns related to the loss of vacuum boost in the Class Vehicles through
13 NHTSA, the Better Business Bureau, internet forums, GM's franchised dealerships,
14 and directly by owners of Class Vehicles.

15 49. Despite Defendant GM's wealth of knowledge relating to the Class
16 Defect in the Class Vehicle's defective braking system and its clear safety
17 implications, GM has and continues to suppress and conceal this knowledge and has
18 failed to disclose that its Class Vehicles' braking systems are defective and
19 dangerous. Consumers continue to operate Class Vehicles and continue to
20 experience dangerous failures of the defective braking system, and are at increased
21 risk for crashes.

22 50. Consumers have submitted individual NHTSA complaints regarding
23 Class Vehicles consistent with a loss of brake boost as described in GM's TSBs.
24 These consumer complaints filed with the NHTSA, and delivered to GM, often
25 highlight the safety risk caused by the defect, including *reports of collisions and*
26 *near-misses*, as well as expressions of concern for drivers' families—without
27 concern and resolution by GM. GM received and were aware of these consumer
28 complaints. Many of these complaints are reprinted in the paragraphs below.

1 51. A consumer complaint dated 10/9/2014 and submitted to NHTSA
2 states the following regarding a Class Vehicle: THE ABS ENGAGES AT SLOW
3 SPEEDS INCLUDING DRY CONDITIONS, LEADING TO TOTAL LOSS OF
4 BRAKING AND INCREASED STOPPING DISTANCES. *TR.

5 52. A consumer complaint dated 1/15/2015 and submitted to NHTSA
6 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
7 2015 CHEVROLET TAHOE. WHILE DRIVING AT 45 MPH, THE SERVICE
8 BRAKE ASSIST WAS DISPLAYED ACROSS THE MESSAGE BOARD. IN
9 ADDITION, THE CONTACT STATED THAT THE BRAKE PEDAL WAS
10 DEPRESSED AND IT TOOK A GREATER AMOUNT OF TIME FOR THE
11 VEHICLE TO COME TO A COMPLETE STOP. THE FAILURE RECURRED
12 ON NUMEROUS OCCASIONS. THE VEHICLE WAS TAKEN TO A DEALER
13 BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS
14 NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 16,562.
15 UPDATED 6/18/15*CN UPDATED 10/12/2017*CN.

16 53. A consumer complaint dated 11/13/2015 and submitted to NHTSA
17 states the following regarding a Class Vehicle: THE VEHICLE HAD VIRTUALLY
18 NO BRAKES TO STOP IT AND 11,215 MILES. GENERAL MOTORS
19 ALREADY HAD SERVICE WARNINGS OUT TO DEALERS DATED
20 7/17/2015, GM DOCUMENT ID #4242788. THEY SAY THEY REPLACED
21 PADS AND ROTORS. AT 23,589 MILES THE VEHICLE NEEDED BRAKES
22 AGAIN. SERVICE MANAGER TELLS US THAT THIS IS A KNOWN
23 PROBLEM AT GENERAL MOTORS. THEY HAVE EVEN ISSUED A NEW
24 WARNING FOR 2016 MODELS. I CONSIDER THE VEHICLE TO BE UNSAFE
25 TO DRIVE IN THAT THE BRAKES CAN GO OUT WITHOUT ANY
26 WARNING.

27 54. A consumer complaint dated 1/4/2016 and submitted to NHTSA states
28 the following regarding a Class Vehicle: THE VEHICLE HAD VIRTUALLY NO

1 BRAKES TO STOP IT AND 11,215 MILES. GENERAL MOTORS ALREADY
2 HAD SERVICE WARNINGS OUT TO DEALERS DATED 7/17/2015, GM
3 DOCUMENT ID #4242788. THEY SAY THEY REPLACED PADS AND
4 ROTORS. AT 23,589 MILES THE VEHICLE NEEDED BRAKES AGAIN.
5 SERVICE MANAGER TELLS US THAT THIS IS A KNOWN PROBLEM AT
6 GENERAL MOTORS. THEY HAVE EVEN ISSUED A NEW WARNING FOR
7 2016 MODELS. I CONSIDER THE VEHICLE TO BE UNSAFE TO DRIVE IN
8 THAT THE BRAKES CAN GO OUT WITHOUT ANY WARNING.

9 55. A consumer complaint dated 2/10/2016 and submitted to NHTSA
10 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
11 2015 GMC YUKON. WHILE DRIVING VARIOUS SPEEDS, THE BRAKE
12 PEDAL WAS APPLIED AND THE VEHICLE FAILED TO STOP. THE BRAKE
13 PEDAL HAD TO BE PUMPED SEVERAL TIMES TO STOP THE VEHICLE.
14 THE VEHICLE WAS TAKEN TO THE DEALER WHERE IT WAS DIAGNOSED
15 THAT THE BRAKE BOOSTER NEEDED TO BE ADJUSTED. THE VEHICLE
16 WAS REPAIRED, BUT THE FAILURE RECURRED. THE VEHICLE WAS
17 TAKEN BACK TO THE DEALER WHERE THE BRAKE FAILURE WAS
18 DUPLICATED AND DIAGNOSED THAT THE BRAKE BOOSTERS NEEDED
19 TO BE REPLACED. THE MANUFACTURER WAS NOTIFIED OF THE
20 FAILURE. THE FAILURE MILEAGE WAS 35,000.

21 56. A consumer complaint dated 7/4/2016 and submitted to NHTSA states
22 the following regarding a Class Vehicle: TRAILER BRAKE ASSIST
23 MALFUNCTION DURING TRIP WHILE DRIVING WITH TRAILER
24 CONNECTED ON HIGHWAY NO PROBLEM AFTER ENDING TRIP AND
25 DISCONNECTING TRAILER BRAKE ASSIST WARNING LIGHT APPEARED
26 AND 1ST GLANCE BRAKES SEEMED FINE BUT FINAL PEDAL PRESSURE
27 IS VERY STIFF ALMOST CAN'T STOP SUV

28 ///

1 57. A consumer complaint dated 8/2/2016 and submitted to NHTSA states
2 the following regarding a Class Vehicle: BRAKES COMPLETELY FAILED. I
3 PULLED INTO TRAIN PARKING SPOT AND THE CARS WOULD NOT STOP.
4 I HAD TO KEEP PUMPING THE BRAKES AND EVENTUALLY IT JUST
5 STOPPED. I TRIED IT GAIN AND THE BRAKES WERE HARD AND
6 COULDN'T PUSH THEM DOWN. I AM SO LUCKY THAT I WAS NOT ON A
7 HIGHWAY GOING FAST WITH MY KIDS IN THE CAR. CADILLAC SAID I
8 NEEDED THE HYDRO BOOST REPLACED.

9 58. A consumer complaint dated 9/7/2016 and submitted to NHTSA states
10 the following regarding a Class Vehicle: I AM WRITING ABOUT MY 2015
11 CHEVY SUBURBAN. I OWN A LIMOUSINE SERVICE AND USE THE
12 SUBURBAN IN MY FLEET. YESTERDAY A DRIVER, WITH PASSENGERS,
13 HAD A TOTAL FAILURE OF THE POWER BRAKING SYSTEM. IT IS AT A
14 LOCAL REPAIR SHOP NOW, AND I AM BEING TOLD THE AIR PUMP HAD
15 BROKEN APART, INSIDE, SNAPPED THE FAN BELT RESULTING IN NO
16 VACUUM GETTING TO THE POWER BRAKE SYSTEM. MY DRIVER WAS
17 BARELY ABLE TO STOP THE VEHICLE BEFORE REAR ENDING
18 ANOTHER CAR ON THE HIGHWAY. THE VEHICLE HAS 54,000 MILES
19 AND I AM BEING TOLD IS OUT OF THE BUMPER TO BUMPER
20 WARRANTY. THERE ARE ALSO NO OPEN RECALLS. I AM REPORTING
21 THIS ISSUE TO THE NHTSA AND THE MASSACHUSETTS ATTORNEY
22 GENERAL'S OFFICE, AS I BELIEVE THIS IS AN IMMEDIATE DANGER TO
23 THE GENERAL MOTORING PUBLIC. I JUST CONTACTED CHEVROLET BY
24 PHONE AND EMAIL. THE REPRESENTATIVE ON THE PHONE SAID ALL
25 SHE COULD TELL ME IS THAT IT'S OUT OF WARRANTY, THERE WERE
26 NO RECALLS, AND I AM BASICALLY ON MY OWN TO REPAIR. I HOPE
27 YOU ARE ABLE TO INVESTIGATE THIS SITUATION, IDENTIFY THE
28 CAUSE OF THIS FAILURE, AND COME UP WITH A REMEDY FOR THE

1 SAFETY OF EVERYONE.

2 59. A consumer complaint dated 10/14/2016 and submitted to NHTSA
3 states the following regarding a Class Vehicle: BRAKES STOPPED WORKING .
4 FIRST TIME IT HAPPENED I THOUGHT IT WAS MY IMAGINATION AS I
5 WAS IN A PARKING LOT GOING EXTREMELY SLOW. NEXT DAY IT
6 HAPPENED WHEN BACKING OUT OF MY DRIVEWAY. HAD TO PRESS
7 BRAKES EXTREMELY HARD AND IT ROLLED TO A STOP AS IT HIT
8 CURB ON OTHER SIDE OF ROAD. TOOK IT TO DEALER AND THEY
9 REPLACE THE VACUUM BOOSTER WHICH HAD FAILED AT APROX.
10 50,000 MILES. NOT COVERED UNDER WARRANTY. EVERY OTHER PART
11 OF BRAKES BESIDES NORMAL WEAR AND TEAR IS COVERED. I WAS
12 LUCKY IT HAPPENED IN MY DRIVEWAY AND NOT WHILE DRIVING AT
13 HIGHER SPEEDS IN TRAFFIC. I HAVE ADDITIONAL COMPLAINTS
14 ABOUT THIS VEHICLHLE. THE CLIPS HOLDING DRIVERS SEAT HAD TO
15 BE REPLACED AT 40,000 MILES BECAUSE SEAT WAS SLIDING FROM
16 SIDE TO SIDE. THEY ARE ALL READY LOOSE AGAIN AT 60,000 MILES
17 ALTHOUGH NOT AS BAD AS FIRST TIME. MY AC CONDENSER WENT
18 OUT AT 62,000 MILES. IT HAS BEEN ON NATIONAL BACKORDER FOR 7
19 WEEKS AND I AM STILL WAITING. THE CAR SHAKES ON THE
20 INTERSTATE AT APROX 70 -75 MILES PER HOUR. THE DEALERSHIP HAS
21 BALANCED THE TIRES AND THIS HAS NOT FIXED PROBLEM. AFTER
22 DRIVING ON INTERSTATE AT HIGH SPEEDS FOR EXTENDED PERIOD OF
23 TIME, WHEN STOPPING THE CAR IDLES VERY ROUGH AND HAS EVEN
24 CUT OFF. THE DEALERSHIP RAN A FUEL INDUCTION SERVICE. WILL
25 SEE IF IT WORKS WHEN I GET IT BACK AFTER THEY REPLACE AC
26 CONDENSER. THE CAR SHIFTS HORRIBLY, ESPECIALLY WHEN GOING
27 SLOW. WAS TOLD THAT IS A PROBLEM WITH THE FUEL EFFICIENT
28 SHIFTING AND THERE IS NO REPAIR...JUST TO MANUALLY SHIFT.

1 ALSO, THE HOOD OF THE CAR HAS TINY RUST SPOTS COMING
2 THROUGH THE PAINT ALL OVER IT.

3 60. A consumer complaint dated 11/28/16 and submitted to NHTSA states
4 the following regarding a Class Vehicle: I HAVE A 2015 CHEVY. SUBURBAN
5 LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO
6 ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL
7 THE PADS HAVE BEEN REPLACED.....THIS IS VERY DANGEROUS.

8 61. A consumer complaint dated 12/1/2016 and submitted to NHTSA
9 states the following regarding a Class Vehicle: THE BRAKES POWER ASSIST
10 FAILS AFTER APPLICATION OF BRAKES IN TRAFFIC OR WHEN
11 REVERSING. WHEN IN HEAVY TRAFFIC SITUATION AND WHEN
12 APPLYING LIGHT PRESSURE NUMEROUS TIMES, THE BRAKES POWER
13 ASSIST FAILS AND YOU HAVE TO APPLY VERY HEAVY PRESSURE TO
14 THE PEDAL TO STOP. REVERSING, THE BRAKES POWER ASSIST FAILS
15 ALMOST IMMEDIATELY AFTER INITIAL BRAKE APPLICATION.

16 62. A consumer complaint dated 1/15/17 and submitted to NHTSA states
17 the following regarding a Class Vehicle: SOME TIME WHEN I BRAKE, THE
18 CAR DO NOT STOP IMMEDIATELY IS SLIGHTING BEFORE STOPPING BY
19 BRAKE, AND BACKWARD DRIVING THE CAR DO NOT WANT TO STOP
20 AND AFTER, DRIVING AGAIN REGULARLY IS FINE I HAD THE CAR IN
21 SERVICE THEY SAY THE CAR IS FINE.....I TOUGH MAYBE I HAVE TO
22 RENEW THE BRAKE BUT NO BRAKE ARE FINE. THIS PROBLEM BEGAN
23 ON JANUARY 1017 UNTIL NOW, BUT IN PERIOD OF COMING AND GO. I
24 ASK THE SERVICE IS ANY RECALLS? THEY TOLD ME" SUBURBAN DO
25 NOT HAVE ANY "RECALLS"

26 63. A consumer complaint dated 2/28/2017 and submitted to NHTSA
27 states the following regarding a Class Vehicle: WHILE DRIVING HER VEHICLE
28 TODAY MY WIFE DEPRESSED HER BRAKE TO STOP AND SHE SAID THE

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

12 64. A consumer complaint dated 4/8/2017 and submitted to NHTSA states
13 the following regarding a Class Vehicle: I WAS ON SLOPE HILL. MY BRAKES
14 ARE NOT RESPONDING. I PUT IN NEW BRAKES 2 MONTHS AGO AND
15 BRAKES NOT RESPONDING? MY CAR ALMOST WENT DOWN THE HILL. I
16 CALLED ROADSIDE ASSISTANCE AND HAD THEM TOWED MY CAR TO
17 DEALERSHIP. THEY FOUND THE ISSUE VACUUM PUMP BROKE. ALSO
18 MY TRANSMISSION HAVING ISSUE SINCE 2 MONTHS. THEY STILL
19 HAVEN'T FOUND ISSUES. I CAN'T CONTROL MY SPEED AND ENGINE
20 GIVES A KICK WHEN ENTERING HIGHWAY. THEY WON'T REPAIR THIS
21 ISSUE BECAUSE THEIR "MECHANICS" CANNOT FIND THE ISSUE. THIS IS
22 THIS WORST VEHICLE TO DRIVE AND UNSAFE FOR DRIVERS AND
23 PASSENGERS.

24 65. A consumer complaint dated 6/17/2017 and submitted to NHTSA
25 states the following regarding a Class Vehicle: BRAKE BOOSTER WENT OUT
26 WHILE DRIVING WITH MY CHILDREN IN THE CAR!

27 66. A consumer complaint dated 6/28/2017 and submitted to NHTSA
28 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A

1 2016 CHEVROLET SILVERADO 1500. WHEN THE BRAKE PEDAL WAS
2 DEPRESSED, THE VEHICLE LOST BRAKE FUNCTIONALITY. THE
3 FAILURE OCCURRED WITHOUT WARNING. THE VEHICLE WAS TAKEN
4 TO HILLTOP CHEVROLET WHERE IT WAS DIAGNOSED THAT THE
5 VACUUM PUMP WAS FAULTY. THE VEHICLE WAS REPAIRED. THE
6 MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE
7 MILEAGE WAS APPROXIMATELY 23,367.

8 67. A consumer complaint dated 6/29/2017 and submitted to NHTSA
9 states the following regarding a Class Vehicle: WHILE DRIVING ON I90 IN STOP
10 AND GO TRAFFIC, THE CAR IN FRONT OF ME STOPPED. I APPLIED MY
11 BRAKES AND THE PEDAL WAS HARD AND WOULD NOT DEPRESS. AS A
12 RESULT MY CAR WOULD NOT STOP AND I HIT THE CAR IN FRONT OF
13 ME IN THE REAR END. MY AIR BAGS WENT OFF. I RECEIVED AN AIR
14 BAG BURN. THE CAR IN FRONT OF ME STRUCK THE CAR IN FRONT OF
15 HIM. BOTH OTHER DRIVERS CLAIM THEY WERE INJURED. MY CAR
16 COST \$15,300 TO REPAIR. CHEVROLET IS AWARE OF THIS PROBLEM,
17 ISSUING PRELIMINARY SERVICE BULLETIN PIT5361 IN 2015,
18 ADDENDUM B IN 2016 AND ADDENDUM B IN 2017. THE PROBLEM IS A
19 FAULTY VACUUM PUMP, MASTER CYLINDER, BRAKE BOOSTER,
20 VACUUM LINE, AND VACUUM PUMP BELT. I WAS NEVER INFORMED
21 OF THIS PROBLEM. I HAVE BEEN DRIVING 50 YEARS AND THIS IS MY
22 FIRST CHARGEABLE ACCIDENT.

23 68. A consumer complaint dated 7/16/2017 and submitted to NHTSA
24 states the following regarding a Class Vehicle: WHILE EXITING THE OHIO
25 TURNPIKE, MY BRAKE PEDAL BEGAN TO STOP DEPRESSING
26 COMPLETELY- TO THE POINT WHERE I COULDN'T PUSH DOWN AT ALL.
27 IT FELT LIKE AN OVER-PUMPED KEG. AS I CONTINUED MY EXIT
28 TOWARD THE TOLL BOOTH, IT SEEMED THAT THE ABS WERE

1 ENGAGING, BUT I WASN'T IN AN EMERGENCY BRAKING SITUATION.
2 THE REST OF MY JOURNEY HOME WAS UNEVENTFUL, UNTIL I
3 ARRIVED HOME. I PULLED INTO MY GARAGE, AND ATTEMPTED TO
4 BACK OUT SO I CHECK UNDER THE VEHICLE TO MAKE SURE THERE
5 WASN'T ANYTHING LEAKING. AS I BACKED OUT, MY BRAKES WOULD
6 NOT ENGAGE PROPERLY AGAIN AND MY CAR ROLLED BACK DOWN
7 MY DRIVE WAY. THE CAR STOPPED AND I PARKED IT WHERE IT WAS.
8 LATER IN THE DAY, I WAS ABLE TO PULL THE CAR INTO MY GARAGE
9 WITHOUT INCIDENT. I TOOK THE CAR TO CHESROWN GMC (THE
10 DEALERSHIP WHERE I PURCHASED THE VEHICLE). THEY ADVISED
11 THEY HAD NEVER HEARD OF SUCH A SITUATION AND HAD ME BEING
12 VEHICLE TO THEM. I COULDN'T REPLICATE THE ISSUE WITH THEM,
13 BUT LEFT THE CAR WITH THEM SO THEY COULD CHECK IT OUT FOR
14 ISSUES. THEY REPLACED THE THE BRAKE VACUUM PUMP. TODAY
15 (7/31/17), THE BRAKES STARTED TO BEHAVE IN THE SAME MANNER AS
16 WHEN THEY FAILED ON 7/16/17.

17 69. A consumer complaint dated 8/11/2017 and submitted to NHTSA
18 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
19 2016 CHEVROLET SILVERADO 1500. WHILE OPERATING ON AN INCLINE,
20 THE BRAKE PEDAL WAS DEPRESSED BUT FAILED TO RESPOND. THE
21 FAILURE OCCURRED WITHOUT WARNING. KENNY ROSS CHEVROLET
22 BUICK GMC (LOCATED AT 11250 US-30, NORTH HUNTINGTON, PA) WAS
23 CONTACTED AND UPDATED THE SOFTWARE AND TRANSMISSION. THE
24 MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE
25 MILEAGE WAS APPROXIMATELY 18,025.

26 70. A consumer complaint dated 8/13/2017 and submitted to NHTSA
27 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
28 2015 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE

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

13 71. A consumer complaint dated 8/18/2017 and submitted to NHTSA
14 states the following regarding a Class Vehicle: THE BRAKES ON MY 2015
15 CHEVY SUBURBAN ARE LOCKING WHEN DRIVING A LOW SPEED. THE
16 PROBLEM STARTED ALL OF THE SUDDEN WHILE DRIVING UNDER DRY
17 ROAD CONDITIONS ON A CITY STREET. IF YOU PRESS ON THE BRAKE
18 PEDAL , IT DOES NOT MOVE AND THE CAR DOES NOT STOPPED. I
19 ALMOST HIT A FAMILY OF 4 THAT WAS CROSSING IN FRONT OF ME.
20 THE CAR HAS BEEN AT DICK BEARD CHEVROLET IN HYANNIS, MA
21 AND THEY ARE SAYING THAT THERE IS NO ISSUE WITH THE BRAKES
22 AND AVOIDING SOLVING THE PROBLEM. I'VE CALLED CHEVROLET 4
23 TIMES AND THEY ARE NOT CALLING ME BACK. THE CAR IS NOT SAFE
24 TO DRIVE AT ALL.

25 72. A consumer complaint dated 9/4/2017 and submitted to NHTSA states
26 the following regarding a Class Vehicle: WHILE DRIVING ON THE ROAD IN
27 TRAFFIC I WENT TO PRESS ON THE BRAKES AND NOTICED THEY HAD
28 BECOME STIFF AND HAD TO PRESS THEM AS HARD AS POSSIBLE TO

1 SLOWLY STOP WHILE TRYING TO AVOID HITTING ANOTHER VEHICLE
2 IN TRAFFIC. NO WARNING LIGHTS WERE ON IN THE DASH UNTIL I
3 PULLED OVER AND RESTARTED VEHICLE A COUPLE OF TIMES. THEN I
4 GOT THE ACTIVE BRAKE ASSIST SERVICE LIGHT ON. I HAD THE
5 VEHICLE TOWED TO THE NEAREST CHEVROLET SERVICE CENTER DUE
6 TO THE VEHICLE NOT SAFE TO DRIVE.

7 73. A consumer complaint dated 9/10/2017 and submitted to NHTSA
8 states the following regarding a Class Vehicle: WHEN APPLYING THE BRAKES
9 MY CAR DOESN'T STOP 100% OF THE TIME. 1 TIME DURING HIGHWAY
10 SLOW MOVING TRAFFIC, 3 TIMES BACKING OUT OF MY DRIVEWAY
11 (FLAT SURFACE), 4 TIMES WHEN ON INCLINE/DECLINE OF ROAD.
12 WHEN APPLYING BRAKES, HORRIBLE CHATTERING VIBRATION
13 COMES FROM LEFT FRONT TIRE AREA, CHATTER VIBRATION IS FELT
14 IN BRAKE PEDAL. NO MATTER HOW HARD I APPLY THE BRAKE THE
15 CAR KEEPS GOING - IT WILL FINALLY STOP, BUT I ALMOST HIT THE
16 CAR IN FRONT OF ME AT THE ONE HIGHWAY OCCURRENCE, 2 TIMES
17 CAR FINALLY STOPPED JUST BEFORE GOING OVER EDGE OF
18 PROPERTY WHEN PULLING FORWARD & BACKWARD TO TURN
19 AROUND IN TIGHT AREA. IN EACH INSTANCE I AM MOVING AT A VERY
20 SLOW SPEED. I CONTACTED DEALERSHIP, THEY TOLD ME I WASN'T
21 THE ONLY ONE CALLING ABOUT THIS HAPPENING BUT SINCE I'M
22 OVER 36,000 WARRANTY THEY WILL CHARGE ME TO CK IT OUT,

23 74. A consumer complaint dated 9/22/2017 and submitted to NHTSA
24 states the following regarding a Class Vehicle: AS I WAS SITTING IN THE
25 VEHICLE IN PARK, I PLACED MY FOOT ON THE BRAKE AND NOTICED
26 THAT THE BRAKE ASSIST HAD ACTIVATED WHILE IN PARK. I WAS
27 UNABLE TO PUSH THE PETAL DOWN. I WAS ABLE TO MOVE THE
28 SHIFTER INTO DRIVE WITH MY FOOT ON THE BRAKE, BUT THE

1 VEHICLE IMMEDIATELY PLUNGED FORWARD. AS I CONTINUED TO
2 TRY AND DEPRESS THE BRAKE PETAL, THE VEHICLE FINALLY
3 SLOWED TO A STOP. BEFORE I COULD GET OFF THE ROAD AND OUT OF
4 TRAFFIC, THE BRAKE ASSIST CONTINUED TO BE LOCKED UP AND
5 THERE WAS NO BRAKES IF I SHIFTED INTO REVERSE. I WAS
6 EXTREMELY CONCERNED FOR MINE AND MY CHILDREN'S SAFETY AS
7 THIS COULD HAVE CAUSED A VERY SERIOUS ACCIDENT. THE BRAKES
8 DID NOT STOP THE VEHICLE AND WERE DEFECTIVE DUE TO THE
9 VACUUM PUMP "GOING OUT". THE VEHICLE IS ONLY 2 YEARS OLD
10 AND HAS 49K MILES.

11 75. A consumer complaint dated 9/26/2017 and submitted to NHTSA
12 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
13 2015 CHEVROLET SUBURBAN. WHILE EXITING THE PARKING LOT AT 5
14 MPH, THE BRAKES FAILED TO WORK WITHOUT WARNING. THE
15 CONTACT HAD TO CHANGE THE GEAR TO PARK IN ORDER TO STOP
16 THE VEHICLE. THE VEHICLE WAS TOWED TO THE DEALER (BOB PRICE
17 CHEVROLET BUICK GMC, 1225 S STATE HWY 16, FREDERICKSBURG, TX
18 78624) WHERE IT WAS DIAGNOSED THAT THE BRAKE BOOSTER AND
19 THE BRAKE PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS NOT
20 REPAIRED. THE MANUFACTURER WAS NOT CONTACTED. THE
21 APPROXIMATE FAILURE MILEAGE WAS 51,800.

22 76. A consumer complaint dated 10/4/2017 and submitted to NHTSA
23 states the following regarding a Class Vehicle: HARD BRAKE PEDAL,
24 INCREASED EFFORT IS NEEDED TO DEPRESS BRAKE PEDAL. MOST
25 COMMONLY AT SPEEDS <35 MPH. OFTEN VEHICLE DOES NOT WANT TO
26 STOP. VEHICLE WAS IN MODERATE MORNING RUSH HOUR TRAFFIC.
27 VEHICLE IN FRONT STOPPED QUICKLY FROM 40 MPH. TRIED PRESSING
28 BRAKE PEDAL ON 2015 TAHOE TO STOP, PEDAL WAS EXTREMELY

1 HARD AND VEHICLE WOULD NOT STOP.

2 77. A consumer complaint dated 10/9/2017 and submitted to NHTSA
3 states the following regarding a Class Vehicle: MY 2015 SUBURBAN WITH
4 APPROX 80K MILES, STARTED HAVING BRAKE PROBLEMS WHEN I
5 WOULD DRIVE IN REVERSE. THE BRAKES HAD A GRINDING NOISE AND
6 WAS GETTING HARD TO PRESS. THE BRAKE PADS WERE REPLACED
7 AROUND 46K MILES AS I BOUGHT THE VEHICLE USED FROM
8 ENTERPRISE SALES. THE BRAKES EVENTUALLY GOT WORSE AND HAD
9 THE BRAKE ASSIST MESSAGE ON DASH COME UP. IF I HAD TO USE THE
10 BRAKES TOO MANY TIMES AT ONE TIME LIKE IF I HAD TO GO OVER
11 SPEED BUMPS IN MY NEIGHBORHOOD, THEN THE BRAKES WOULD BE
12 EXTREMELY HARD AND WOULD LOSE ALL POWER BRAKES. IF I KEPT
13 THE VACUUM UP WITH A LITTLE RPM'S- ONE FOOT ON THE BRAKE
14 AND ONE ON THE GAS, THEN I COULD GET THE POWER BRAKES TO
15 WORK. NOW IT'S JUST TOTALLY GONE. NO POWER BRAKES AT ALL
16 NOW AND ORDERED THE VACUUM BOOSTER AND WILL REPLACE IT
17 MYSELF. I CALLED THE MAIN CHEVROLET HOTLINE AND THEY WERE
18 TOTALLY WORTHLESS. I TOLD THEM ABOUT ALL THE NUMEROUS
19 COMPLAINTS POPPING UP ON THE INTERNET AND WITH SUBURBANS
20 WITH MUCH LESS MILES THAN MINE AND TRIED TO SEE IF THEY HAD
21 ANY RECALLS REGARDING THE BRAKES. THEY SAID NO. I SAID THEY
22 SHOULD BE CONCERNED BEFORE IT ENDS UP KILLING SOMEONE.

23 78. A consumer complaint dated 10/26/2017 and submitted to NHTSA
24 states the following regarding a Class Vehicle: WHILE DRIVING, THE DASH
25 MESSAGE ALERTED ME THAT I NEEDED TO "SERVICE BRAKE ASSIST." I
26 WAS NOT USING THE BRAKES, SO I STARTED TO SLOW DOWN AND
27 THE BRAKES WORKED, BUT WHEN I CAME TO THE LIGHT, IT WAS LIKE
28 PRESSING A ROCK AND THE PEDAL WOULD NOT PUSH DOWN. I HAD

1 COMPLETE BRAKE FAILURE, BUT THANKFULLY HAD SLOWED
2 ENOUGH BEFORE COMING TO THE LIGHT, THAT I COULD THROW THE
3 CAR INTO PARK. I PULLED INTO A PARKING LOT AND TAPPED THE
4 BRAKES SEVERAL TIMES, TURNED MY CAR OFF, TURNED IT BACK ON,
5 PUT THE PARKING BRAKE ON AND OFF. THE BRAKES WORKED SO I
6 BEGAN DRIVING VERY CAUTIOUSLY AND STUCK TO BACK ROADS
7 AND STAYED UNDER 35 MPH. THE BRAKES FAILED TWICE MORE AT A
8 STOP SIGN AND A RED LIGHT, WHILE I WAS DRIVING AT LOW SPEEDS.
9 I DROVE THE CAR ONE MORE TIME A FEW HOURS LATER AND HAD
10 COMPLETE BRAKE FAILURE EVERY TIME I TRIED TO STOP. I HAD TO
11 EITHER THROW THE CAR INTO PARK, OR DRIVE INTO A PARKING LOT
12 TO SLOW DOWN. I HAD IT TOWED TO A SERVICE CENTER AT THE
13 CHEVY DEALERSHIP. THE VEHICLE IS UNDER 3 YEARS OLD, HAS
14 ABOUT 60,000 MILES ON IT, HAS BEEN KEPT IN GREAT CONDITION, HAS
15 ON TIME OIL CHANGES, NEVER BEEN IN AN ACCIDENT, AND HAS NEW
16 TIRES. THE CAR HAD NO SQUEALING OR GRINDING TO SHOW WEAR
17 AND TEAR, OR ANY OTHER INDICATOR THE BRAKES WOULD FAIL. THE
18 DEALERSHIP MAINTAINS THAT THIS IS NOT COVERED BECAUSE WE
19 ARE OUT OF WARRANTY, HOWEVER, WE HAVE AN EXTENDED
20 WARRANTY THAT WE ARE USING TO FIX THIS ISSUE. IT IS UNKOWN
21 THE EXACT CAUSE, BECAUSE IT IS AT THE SHOP AWAITING
22 DIAGNOSTICS.

23 79. A consumer complaint dated 10/31/2017 and submitted to NHTSA
24 states the following regarding a Class Vehicle: WHILE REVERSING IN SLOW
25 SPEEDS INTERMITTENTLY IN FORWARD MOTION, THE BRAKE PEDAL
26 BECOMES VERY HARD AND WILL NOT STOP THE VEHICLE. THE BRAKE
27 PEDAL HAS TO BE DEPRESSED VERY HARD AND THERE IS A
28 VIBRATING MOTION. THE MASTER CYLINDER HAS ALREADY BEEN

1 REPLACED BY THE DEALERSHIP AT AN EXPENSE OF NEARLY \$600, BUT
2 THE ISSUE PERSISTS.

3 80. A consumer complaint dated 11/2/2017 and submitted to NHTSA
4 states the following regarding a Class Vehicle: I WAS DRIVING IN TRAFFIC
5 GOING ABOUT 5MPH AND WHEN I APPLIED MY BRAKES THEY WERE
6 NOT WORKING 100% I HAD TO PUSH THE PEDAL TO THE FLOOR AND
7 THE TRUCK KEPT ROLLING. I HAD TO HAD TO FIGURE OUT A WAY TO
8 SAFELY MOVE TO THE SHOULDER OF THE FREEWAY TO AVOID
9 ACCIDENTS. I WAITED ON THE SHOULDER OF THE FREEWAY FOR
10 ABOUT A HOUR FOR TRAFFIC TO STOP. I WAS FINALLY ABLE TO GET
11 OFF THE FREEWAY SO I COULD CHECK THE BRAKE FLUID IT WAS
12 FULL. I KNEW THERE WASN'T A PROBLEM WITH THE BRAKES
13 BECAUSE THEY HAD JUST BEEN REPLACED THE PRIOR MONTH. I
14 KNEW THE VEHIUCE WAS NOT SAFE TO DRIVE HOME SO I LEFT THE
15 TRUCK AT DAVIS CHEVROLET AT THEIR NIGHT DROP. I TALKED TO A
16 SERVICE TECHNICIAN AND HE INFORMED ME THAT HE HAS SEEN THIS
17 ISSUE A LOT WITH 2015 TAHOE'S, AND INFAC 3 2015 TAHOE'S WERE
18 BROUGHT IN THE SAME DAY NOVEMBER 3,2017. BEFORE LOOKING AT
19 MY VEHICLE THE TECHNICIAN TOLD ME IT WAS THE VACUME PUMP
20 BUT HE WOULD CALL ME BACK TO LET ME KNOW FOR CERTAIN.
21 ONCE THEY LOOKED AT MY TRUCK HE SAID IT WAS THE VACUUM
22 PUMP THAT NEEDED TO BE REPLACED AND IT WAS NOT UNDER
23 WARRANTY. I DON'T UNDERSTAND HOW GM KNOWS ABOUT THIS
24 ISSUE AND STILL DOES NOT RECALL IT, THIS CAN CAUSE MAJOR
25 ACCIDENTS AND POTENTIALLY CAUSE A LIFE. IT'S OBVIOUS THERE IS
26 A ISSUE WITH TJE VACUUME PUMPS IN TJE 2015 TAHOE'S AND GM
27 NEEDS TO TAKE RESPONSIBILITY AND DO A RECALL BEFORE
28 SOMEONE DIES BECAUSE THEIR BRAKES FAIL DUE TO A VACUUM

1 PUMP NOT WORKING

2 81. A consumer complaint dated 11/4/2017 and submitted to NHTSA
3 states the following regarding a Class Vehicle: UPON DRIVING IN LOW SPEED,
4 DRY CONDITIONS, BUMPER TO BUMPER TRAFFIC (LESS THAN 10MPH),
5 MY 2015 CHEVROLET TAHOE LTZ'S BRAKES BECAME UNRESPONSIVE.
6 AT THAT POINT, I PUT ALL MY WEIGHT ON THE BRAKES AND THE CAR
7 CAME TO AN UNCALCULATED STOP. THIS PROBLEM PERSISTED AND
8 DID NOT REMEDY ITSELF. THE DEALERSHIP NOTIFIED ME THAT THERE
9 WAS A FAULTY BRAKE VACUUM PUMP, AND BRAKE BOOSTER, AND
10 THAT IT FAILED BECAUSE OF MOISTURE PENETRATION. FURTHER,
11 GENERAL MOTORS HAS ISSUED TECHNICAL BULLETIN PIT 5361A/B/C
12 TO ADDRESS THIS KNOWN ISSUE. MY TAHOE HAS 59,000 MILES ON IT.
13 AFTER FURTHER RESEARCH, THIS IS A KNOWN ISSUE BY GM AT THE
14 TIME OF MY VEHICLE PURCHASE IN DECEMBER 2014 AND FURTHER,
15 HAS BEEN ACKNOWLEDGED THROUGH TECHNICAL BULLETINS TO
16 THE GM DEALERS. FURTHER, THERE ARE DOCUMENTED CASES
17 WHERE INJURIES/WRECKS HAVE OCCURRED DUE TO THIS SPECIFIC
18 ISSUE. THE GENERAL MOTORS COMPANY HAS BEEN NEGLIGENT IN ITS
19 HANDLING OF THIS IMPORTANT SAFETY (NOT COSMETIC) ISSUE.

20 82. A consumer complaint dated 11/11/2017 and submitted to NHTSA
21 states the following regarding a Class Vehicle: WHILE DRIVING AT SLOW
22 SPEED IN SCHOOL PARKING LOT BRAKE PEDAL FAILED TO STOP
23 VEHICLE WHEN USING NORMAL BRAKE PRESSURE. PEDESTRIAN IN
24 FRONT OF VEHICLE JUMPED OUT OF THE WAY TO AVOID BEING
25 STRUCK.

26 83. A consumer complaint dated 11/16/2017 and submitted to NHTSA
27 states the following regarding a Class Vehicle: PROBLEM STARTED AS
28 BRAKES EXTREMELY DIFFICULT TO ACTIVATE WHEN TRAVELING IN

1 REVERSE AT LOW SPEED (I AM APPROX 200 LBS AND HAD TO STAND
2 ON BRAKES WITH EFFORT TO GET VEHICLE TO STOP). PROBLEM ALSO
3 APPEARED IN LOW SPEED STOP AND GO OPERATION AS WELL AS
4 WHEN BACKING AT A MODERATE SPEED OF APPROXIMATELY 10
5 MILES PER HOUR. WE HAVE HAD AT LEAST ONE OTHER VEHICLE IN
6 OUR FLEET EXPERIENCE THIS ISSUE. IT WAS DETERMINED TO BE A
7 FAILED VACUUM PUMP ON THAT VEHICLE. THIS VEHICLE WAS TAKEN
8 TO DEALER AND THEY WERE UNABLE TO REPLICATE ISSUE. I
9 UNDERSTAND THERE IS A GM TECHNICAL BULLETIN INVOLVING THIS
10 ISSUE BUT NO OIL WAS FOUND IN VACUUM LINES. THE VEHICLE IS
11 OUTSIDE OF WARRANTY SO THERE IS CHARGES EACH TIME WE BRING
12 VEHICLE BACK. I WAS TOLD TO BRING VEHICLE BACK IF PROBLEM
13 BECOMES WORSE. I FEEL A FAILURE OF BRAKES IS AN EXTEREME
14 SAFETY CONCERN IN NORMAL OPERATION AND ESPECIALLY IN HIGH
15 SPEED EMERGENCY OPERATION OF THE VEHICLE. A SEARCH OF THE
16 NHTSA SITE AS WELL AS INTERNET HAS REVELED NUMEROUS
17 COMPLAINTS REGARDING THIS EXACT ISSUE. IT APPEARS THE
18 COMMON REPLACEMENT IS THE BRAKE ASSIST AND VACUUM PUMP.

19 84. A consumer complaint dated 11/19/2017 and submitted to NHTSA
20 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
21 2015 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 25 MPH,
22 THE STEERING WHEEL INADVERTENTLY PULLED TO THE RIGHT.
23 WHILE ATTEMPTING TO DEPRESS THE BRAKE PEDAL, THE BRAKES
24 FAILED TO STOP THE VEHICLE. AS A RESULT, THE CONTACT LOST
25 CONTROL OF THE VEHICLE AND CRASHED INTO A PARKED VEHICLE.
26 WHILE THE GEAR SHIFTER WAS IN REVERSE OR DRIVE, THE VEHICLE
27 FAILED TO OPERATE. THE AIR BAGS DID NOT DEPLOY. THE TIRE
28 PRESSURE AND EPS ASSIST WARNING INDICATORS ILLUMINATED. THE

1 CONTACT SUSTAINED AN INJURY TO THE LOWER BACK, BUT NO
2 MEDICAL ATTENTION WAS REQUIRED. A POLICE REPORT WAS NOT
3 FILED. THE VEHICLE WAS TOWED TO NISSANI BROS. CHEVROLET (6101
4 W SLAUSON AVE, CULVER CITY, CA 90230 (424) 216-7400), BUT IT HAD
5 NOT BEEN DIAGNOSED. THE VEHICLE WAS NOT REPAIRED. THE
6 CONTACT REFERENCED NHTSA CAMPAIGN NUMBER: 16V256000
7 (SUSPENSION). THE MANUFACTURER WAS NOTIFIED OF THE FAILURE
8 AND THE CONTACT WAS PROVIDED CASE NUMBER: 8-3571350184. THE
9 CONTACT WAS ADVISED TO CALL NHTSA. THE APPROXIMATE
10 FAILURE MILEAGE WAS 25,400.

11 85. A consumer complaint dated 12/8/2017 and submitted to NHTSA
12 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
13 2015 GMC YUKON. WHILE AT A DRIVE THRU WITH THE BRAKE PEDAL
14 DEPRESSED TO THE FLOORBOARD, THE BRAKES FAILED. THE
15 CONTACT HAD TO APPLY EXCESSIVE FORCE IN ORDER FOR THE
16 VEHICLE TO STOP. THERE WERE NO WARNING INDICATORS
17 ILLUMINATED. THE VEHICLE WAS TAKEN TO STARLING CHEVROLET
18 BUICK GMC (1001 E IRLO BRONSON MEMORIAL HWY, ST CLOUD, FL
19 34769, PHONE: (407) 892-5144), BUT THE CAUSE OF THE FAILURE COULD
20 NOT BE DETERMINED. THE VEHICLE WAS NOT REPAIRED. THE
21 MANUFACTURER WAS NOTIFIED AND STATED THAT THE FAILURE
22 HAD TO BE DUPLICATED. THE APPROXIMATE FAILURE MILEAGE WAS
23 42,000. THE VIN WAS NOT AVAILABLE.

24 86. A consumer complaint dated 12/12/2017 and submitted to NHTSA
25 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
26 2015 CHEVROLET SUBURBAN. WHILE DRIVING APPROXIMATELY 40
27 MPH, THE CONTACT ATTEMPTED TO APPLY THE BRAKES AND THE
28 BRAKE PEDAL WOULD NOT DEPRESS. THE CONTACT HAD TO APPLY

1 THE EMERGENCY BRAKE TO GET THE VEHICLE TO STOP. THE VEHICLE
2 WAS NOT TAKEN TO THE DEALER. THE VEHICLE WAS DRIVEN TO AN
3 INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE
4 MASTER BRAKE CYLINDER AND BRAKE BOOSTER FAILED. THE
5 MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE VIN WAS
6 UNKNOWN. THE FAILURE MILEAGE WAS 100,000.

7 87. A consumer complaint dated 12/16/2017 and submitted to NHTSA
8 states the following regarding a Class Vehicle: BRAKES BECAME EXTREMELY
9 STIFF, AND POWER ASSIST WAS LOST. VEHICLE IS VERY HARD TO
10 STOP, NEARLY CAUSING AN ACCIDENT SEVERAL TIMES. TOOK
11 VEHICLE TO A SERVICE SHOP, AND FOUND OUT THAT THE VACUUM
12 PUMP WAS DEFECTIVE AND CAUSED OIL TO ENTER MY BRAKE
13 VACUUM AND BRAKE LINES. HAD TO ALL BE REPLACED.

14 88. A consumer complaint dated 12/23/2017 and submitted to NHTSA
15 states the following regarding a Class Vehicle: WHILE TRAVELING STRAIGHT
16 AT 70 MPH ON THE HIGHWAY IN MY 2015 CHEVY SUBURBAN (62K
17 MILES) THE VEHICLE EXPERIENCED A SUDDEN AND UNDETECTED
18 COMPLETE BRAKE SYSTEM FAILURE. AS I APPROACHED SLOWING
19 TRAFFIC WITH THE CRUISE CONTROL ON, I TAPPED THE BRAKES TO
20 DISENGAGE THE CRUISE CONTROL, ONLY TO FIND THAT THE BRAKE
21 PEDAL WAS RIGID AND COULD NOT BE DEPRESSED. TO AVOID A
22 COLLISION AT A HIGH RATE OF SPEED I SWERVED ONTO THE RIGHT
23 SHOULDER WHILE USING TWO LEGS TO AGGRESSIVELY PUSH THE
24 BRAKE PEDAL DOWN - ALL THE WHILE FEELING VERY LITTLE
25 BRAKING ACTION. THE CAR CAME TO A STOP AFTER ABOUT 75
26 METERS. AT NO TIME BEFORE OR DURING THE EVENT DID THE CAR
27 SIGNAL A BRAKING SYSTEM PROBLEM. IN FACT IT STILL SHOWED NO
28 SYSTEM INDICATOR OF A BRAKE PROBLEM 3 DAYS LATER WHEN IT

1 WAS DELIVERED TO THE DEALER FOR DIAGNOSIS. THE CAR HAS BEEN
2 WELL MAINTAINED, HAVING JUST UNDERGONE A 60K MILE SERVICE
3 AT THE DEALERSHIP. THE LACK OF THE VEHICLE'S RECOGNITION
4 THAT A CRITICAL FAILURE IN THE BRAKING SYSTEM HAD OCCURRED
5 POSED A SERIOUS AND IMMEDIATE THREAT TO PASSENGERS AND
6 SURROUNDING TRAFFIC. AS A PHYSICIAN I CAN ATTEST THAT A
7 COLLISION AT THAT SPEED WOULD HAVE SEVERELY INJURED OR
8 EVEN KILLED THOSE INVOLVED. THIS PROBLEM WITH THE 2015
9 CHEVY SUB HAS REPORTED TO NHTSA BEFORE - THIS IS NOT AN
10 ISOLATED EVENT. THE SERVICE CENTER REPORTED TO ME THAT A
11 VACUUM PUMP FAILURE WAS TO BLAME - I BELIEVE THIS IS A MORE
12 COMPLEX ENGINEERING PROBLEM IN THAT THE VEHICLE DID NOT
13 DETECT A PROBLEM DESPITE THE FAILURE CREATING A LIFE
14 THREATENING SCENARIO. ALTHOUGH I PLAN TO IMMEDIATELY
15 DISPOSE OF THIS CAR, FAILURE TO ADDRESS THIS PROBLEM BY THE
16 MANUFACTURER WILL PUT OTHERS AT RISK IN THE FUTURE. GM
17 APPEARS TO HAVE ISSUED A SERVICE BULLETIN THAT REFERS TO
18 THIS PROBLEM (ATTACHED). I SINCERELY BELIEVE THIS DEFECT WILL
19 RESULT IN LIVES LOST IF LEFT UNADDRESSED. INFORMATION
20 REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT
21 (FOIA), 5 U.S.C. 552(B)(6).

22 89. A consumer complaint dated 12/28/2017 and submitted to NHTSA
23 states the following regarding a Class Vehicle: I'M HAVING BRAKE BOOSTER
24 FAILURE AT SLOW SPEEDS, THE BRAKE PETAL IS SUPER HARD TO
25 PUSH DOWN AND IT ALMOST ISN'T ENOUGH TO MAKE THE TRUCK
26 STOP ROLLING AT SLOW SPEEDS. TRUCK HAS RIGHT AT 43,XXX MILES
27 ON IT AND IS NOT UNDER WARRANTY.

28 ///

1 90. A consumer complaint dated 1/5/2018 and submitted to NHTSA states
2 the following regarding a Class Vehicle: AS WE WERE DRIVING FROM
3 ATLANTA TO MIAMI, WHEN WE WERE GETTING OFF THE HIGHWAY
4 THE BRAKES ON OUR 2015 CHEVROLET SUBURBAN FAILED TO STOP
5 AT 60 MILES PER HOUR, WE ALMOST REARED-ENDED AN EIGHTEEN-
6 WHEELER; WITH OUR FAMILY OF FIVE AND OUR TWO DOGS ON
7 BOARD! ALL FLUIDS HAD BEEN CHECKED ON THE CAR AND THE
8 BRAKE PADS WERE RECENTLY CHANGED. WE JUST CALLED AND
9 NOTIFIED CHEVROLET ABOUT THIS SAFETY ISSUE. WE ASKED IF
10 THERE WERE ANY ISSUES AND/OR RECALLS ON OUR VEHICLE AND
11 THE AGENT SAID THAT THERE WERE NO ISSUES OR RECALLS
12 REGARDING THIS TYPE OF VEHICLE. WE MADE AN APPOINTMENT TO
13 HAVE OUR CAR DIAGNOSED AS SOON AS POSSIBLE. AFTER
14 RESEARCHING ONLINE WE FOUND NUMEROUS POSTS ON SEVERAL
15 SITES FROM OTHER SUBURBAN OWNERS REPORTING THE SAME ISSUE
16 WITH THEIR BRAKING SYSTEM NOT RESPONDING. WHAT WILL IT
17 TAKE FOR CHEVROLET TO ACKNOWLEDGE THIS BRAKE FAILURE
18 SYSTEM ISSUE?!?! SOMEONE TO GET KILLED?!?! PLEASE LOOK INTO
19 THIS BRAKE FAILURE ISSUE AND ADDRESS IT PROMPTLY!!!

20 91. A consumer complaint dated 1/12/2018 and submitted to NHTSA
21 states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A
22 2015 GMC YUKON. WHILE DRIVING APPROXIMATELY 5 MPH, THE
23 BRAKE PEDAL STIFFENED AND THE VEHICLE DID NOT STOP WHEN
24 THE PEDAL WAS DEPRESSED. THERE WERE NO WARNING INDICATORS
25 ILLUMINATED. THE CONTACT USED THE EMERGENCY BRAKE TO STOP
26 THE VEHICLE. THE VEHICLE WAS TAKEN TO KEYES WOODLAND HILLS
27 BUICK GMC (6133 TOPANGA CANYON BLVD, WOODLAND HILLS, CA
28 91367) WHERE IT WAS DIAGNOSED THAT THE VACUUM PUMP FAILED

1 AND DAMAGED THE ENTIRE BRAKING SYSTEM. THE TECHNICIAN
2 REPLACED THE VACUUM PUMP AND THE ENTIRE BRAKING SYSTEM.
3 THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND
4 STATED THAT THERE WAS NO RECALL. THE FAILURE MILEAGE WAS
5 40,500.

6 92. A consumer complaint dated 2/2/2018 and submitted to NHTSA states
7 the following regarding a Class Vehicle: ISSUE REGARDING BRAKING
8 SYSTEM AND INTERNAL FAILURE. COST TO REPAIR IS \$1500 ON A 3
9 YEAR OLD CAR. GM HAS BEEN AWARE OF THIS ISSUE SINCE 2015.
10 THEY ARE ALSO DEFENDANTS IN A CLASS ACTION LAWSUIT
11 REGARDING THE BRAKES AND THE CATASTROPHIC FAILURE THAT
12 WILL EVENTUALLY RESULT IN DEATH.

13 93. A consumer complaint dated 2/6/2018 and submitted to NHTSA states
14 the following regarding a Class Vehicle: MY 2015 CHEVROLET TAHOE LT
15 WOULD NOT STOP APPROACHING A MAJOR INTERSECTION. BRAKE
16 PEDAL BECAME HARD AND WOULD NOT COME TO A COMPLETE STOP
17 AT A MAJOR CITY INTERSECTION, NEARLY CAUSING AN ACCIDENT. I
18 WAS TOLD BY THE DEALERSHIP THAT THE VACUUM PUMP WILL NEED
19 TO BE REPLACED AT MY EXPENSE AND IT IS A COMMON OCCURRENCE
20 ON THIS YEAR AND MODEL . NOT ONLY IS THIS A SAFETY ISSUE, ITS A
21 COMMON PROBLEM AND A TECHNICAL BULLETIN HAS BEEN
22 RELEASED FOR THE REPAIR. THIS VEHICLE IS OUT OF THE BUMPER TO
23 BUMPER WARRANTY BUT IS STILL HOWEVER UNDER THE 1000,000
24 DRIVE TRAIN WARRANTY. GM NEEDS TO ADDRESS THIS PROBLEM
25 BEFORE SOMEONE GETS INJURED.

26 94. A consumer complaint dated 3/5/2018 and submitted to NHTSA states
27 the following regarding a Class Vehicle: PLACING CAR IN REVERSE OR
28 DRIVE AT SLOW SPEEDS AND PRESSING BRAKES ALL THE WAY TO

1 THE FLOOR WITH THE VEHICLE NOT STOPPING. BRAKE SYSTEM
2 WARNING LIGHT WOULD COME ON. ISSUE COMES AND GOES WHEN IT
3 PLEASES. TAKING THE SUBURBAN TO DEALERSHIP TODAY. STARTED
4 HAPPENING AROUND 59000 MILES

5 95. A consumer complaint dated 3/10/2018 and submitted to NHTSA
6 states the following regarding a Class Vehicle: BRAKES GOT HARD WHEN
7 DRIVING ONTO EXPRESSWAY TAHOE HAS ONLY 42000 MILES AND
8 HEARD THERES BEEN ALOT OF ISSUES WITH THE VACUUM PUMP
9 WHAT I HAVE READ.THERE NEEDS TO BE A RECALL

10 96. A consumer complaint dated 3/13/2018 and submitted to NHTSA
11 states the following regarding a Class Vehicle:I BEEN HAVING MY TRUCK
12 FOR 2 YEARS AND BRAKES KEEP GOING OUT AND THE AIR CONDITION
13 KEEPS GOING OUT. I HAVE TWO FRIENDS THE SAME VEHICLE WITH
14 THE SAME PROBLEMS. THIS IS RIDICULOUS I SEE NO RECALLS ON
15 THAT. AND I'VE SEEN ON THE REVIEWS OF THIS VEHICLE AND ITS NOT
16 JUST ME THERE'S PEOPLE OUT THERE WITH THE SAME PROBLEM THAT
17 I AM HAVING. THIS COULD CAUSE A REALLY BAD ACCIDENT THE
18 BRAKES KEEP GOING OUT I AM NOT THE ONLY ONE WITH THIS
19 PROBLEM. PLEASE TAKE IN CONSIDERATION THAT EVERYONE HAS
20 FAMILIES. AND ACCIDENTS COULD CAUSE US TO LOSE OUR FAMILY
21 JUST FOR A SIMPLE BRAKES THAT HAVE NOT BEEN RECALLED. AND
22 ALSO, WE JUST CANNOT KEEP AFFORDING TO FIX THE AIR
23 CONDITIONING THIS TRUCK IS NOT EVEN OLD ENOUGH TO BE GIVING
24 US THESE PROBLEM. THANK YOU

25 97. A consumer complaint dated 3/23/2018 and submitted to NHTSA
26 states the following regarding a Class Vehicle: IN OCTOBER 2017 WE
27 EXPERIENCED BRIEF PERIODS WHERE BRAKE PEDAL BECAME RIGID
28 AND IMPOSSIBLE TO DEPRESS. THE VEHICLE WAS TAKEN TO OUR

1 LOCAL CHEVROLET DEALER. WE DESCRIBED IN DETAIL THE RIGID
2 BRAKE PEDAL. THE DEALER WANTED TO DO PUT NEW BRAKE PADS
3 AND TURN THE ROTORS. I THOUGHT IT WAS STRANGE THAT A
4 VEHICLE WITH JUST OVER 40 THOUSAND MILES WOULD NEED NEW
5 BRAKES, BUT WE HAD THE WORK DONE. THE DEALER ALSO WANTED
6 TO REPLACE THE VACUUM HOSE WHICH POWERS THE BRAKE
7 SYSTEM. THIS WORK WAS ALSO DONE. NEXT, ON FRIDAY MARCH 23,
8 2018 WE WERE TRAVELING ON AN INTERSTATE AT A HIGH SPEED
9 WHEN THE BRAKE PEDAL BECAME IMPOSSIBLE TO DEPRESS. WE
10 WERE VERY FORTUNATE NOT TO CAUSE A SERIOUS ACCIDENT. I HAD
11 TO HAVE IT TOWED TO A DEALER AND RENT A CAR. THE FOLLOWING
12 WEEK WE WERE CONTACTED BY THE DEALER DOING THE REPAIRS.
13 OUR SUBURBAN HAD A VACUUM PUMP FAILURE. THIS CAUSED TOTAL
14 BRAKE FAILURE. AFTER SOME RESEARCH I DISCOVERED THAT THIS
15 VEHICLE'S ENGINE DOES NOT PRODUCE ENOUGH VACUUM TO POWER
16 THE BRAKES (UNLIKE EVERY OTHER VEHICLE ON THE ROAD). IN ANY
17 OTHER CAR THE ONLY WAY YOU LOSE SUCTION FOR YOUR BRAKES IS
18 IF THE ENGINE STOPS. IN OUR SUBURBAN THE ENGINE CAN BE
19 RUNNING FINE AND YOU MAY OR MAY NOT HAVE BRAKES. THE
20 WARNING SYSTEM IS TOTALLY USELESS AS IT ISN'T TRIGGERED
21 UNTIL YOU EXPERIENCE TOTAL BRAKE FAILURE WITHOUT ANY
22 WARNING. WHILE THE VEHICLE WAS IN THE SERVICE DEPARTMENT
23 HAVING VACUUM PUMP REPLACED THE DEALER ALSO EXPLAINED
24 THAT ALL FOUR MAGNETIC RIDE SHOCKS/STRUTS WERE LOCKED IN
25 PLACE AND NOT FUNCTIONING AT ALL. THIS IS ANOTHER SERIOUS
26 SAFETY ISSUE. I HAVE NEVER HEARD OF SHOCKS "LOCKING UP" .
27 AFTER SOME MORE RESEARCH, I FOUND THIS IS A HUGE PROBLEM
28 FOR GM VEHICLES. A PROBLEM THAT GM HAS FAILED TO ADDRESS. I

1 HAVE ALSO HAD 3 MAJOR REPAIRS ON AC. INCLUDING NE AC LINES
2 AND NEW COMPRESSOR.

3 98. A consumer complaint dated 4/11/2018 and submitted to NHTSA
4 states the following regarding a Class Vehicle: MY VEHICLE HAS EXHIBITED A
5 KNOCKING NOISE ON THE LEFT DRIVER SIDE TIRE, PROBLEMS WITH
6 VIBRATION AT HIGH SPEEDS, ENGINE LIGHT COMING ON IF DRIVING
7 HIGHWAY SPEEDS, BRAKE ISSUES, BRAKES BECOME STIFF AND WILL
8 NOT STOP VEHICLE WHATSOEVER! AT BOTH THIS HAPPENED TWICE
9 WHILE MY CAR WAS IN MOTION NEARLY KILLING ME AND MY KIDS!!!
10 AIR CONDITIONING ISSUES AS WELL. BLOWS HOT AIR UNTIL YOU
11 PLAY WITH BOTTOMS.

12 99. A consumer complaint dated 5/13/2018 and submitted to NHTSA
13 states the following regarding a Class Vehicle: WHEN DRIVING IN LOW
14 SPEEDS - SUCH AS PARKING OR STOP/GO TRAFFIC MY BRAKES FAIL TO
15 WORK. I TRY TO PUSH PEDAL DOWN AS HARD AS I CAN BUT BARELY
16 SEEMS TO STOP. I HAVE HAD TO PUSH MY EMERGENCY BRAKE PEDAL
17 MORE THAN ONCE TO STOP AN ACCIDENT FROM HAPPENING I ALSO
18 HAVE A SMALL CHILD THAT I FEAR WILL BE HURT IF THE PROBLEM IS
19 NOT FIXED. I HAVE TAKEN IT TO DEALERSHIP AND THEY SAY THEY
20 CAN'T REPLICATE THE ISSUE THERE FORE CAN NOT FIX.

21 **V. CLASS ALLEGATIONS**

22 100. Pursuant to Fed. R. Civ. P. 23(b)(2) and (b)(3), Plaintiffs will seek
23 certification of a Class consisting of:

24 All consumers who purchased or leased in California a 2015 or newer
25 Cadillac Escalade, 2014 or newer Chevrolet Silverado, 2015 or newer
26 Chevrolet Suburban, 2015 or newer Chevrolet Tahoe, 2014 or newer
27 GMC Sierra, or 2015 or newer GMC Yukon/Yukon XL.

28 101. This action has been brought and may be properly maintained and
certified as a Class Action because:

1 (a) The questions and issues of law or fact are of a common or
2 general interest, affecting the Class of individuals and the public at
3 large;

4 (b) The Class consists of a sufficiently large group of
5 individuals, believed to exceed thousands of members, and is so large
6 that it is impractical to join all members of the Class before the Court
7 as individual plaintiffs. The identity of Class members is readily
8 ascertainable from various sources including GM's ownership records,
9 GM's repair records, government ownership records, and/or via simple
10 notice by publication;

11 (c) The questions of law or fact common to the Class are
12 substantially similar and predominate over those questions affecting
13 only specific members of the Class;

14 (d) The Class is united by a community of interests in
15 obtaining appropriate equitable relief including injunctive relief, recall
16 of Class Vehicles, restitution, damages, and other available relief
17 designed to redress the wrongful conduct of Defendant GM;

18 (e) Plaintiffs are members of the Class and their claims are
19 typical of the Class;

20 (f) Plaintiffs will fairly and adequately represent the claims of
21 the Class, and protect the interests of each member of the Class without
22 exercising personal interest or otherwise acting in a manner
23 inconsistent with the best interests of the Class generally;

24 (g) Plaintiffs retained attorneys experienced in the litigation of
25 class and representative claims and in the area of consumer protection
26 litigation who have agreed to and will responsibly and vigorously
27 advocate on behalf of the Class as a whole;

28 (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;

1 (i) Defendant GM acted or refused to act on grounds
2 generally applicable to the Class, thereby making the award of
3 equitable relief and/or restitution appropriate to the Class as a whole;

4 (j) The class action procedure is superior to other methods of
5 adjudication, and specifically designed to result in the fair, uniform and
6 efficient adjudication of the claims presented by this complaint. This
7 class action will facilitate judicial economy and preclude the undue
8 financial, administrative and procedural burdens which would
9 necessarily result from a multiplicity of individual actions.

10 102. Because the damages suffered by each Class Member is relatively
11 small compared to the expense and burden of prosecuting this compelling case
12 against a well-financed, multibillion dollar corporation, this class action is the only
13 way each Class Member can redress the harm that Defendant GM caused.

14 103. Should individual Class Members be required to bring separate actions,
15 California's courts would face a multitude of lawsuits that would burden the court
16 system and create a risk of inconsistent rulings and contradictory judgments. In
17 contrast to proceeding on a case-by-case basis, in which inconsistent results will
18 magnify the delay and expense to all parties and the court system, this class action
19 presents far fewer management difficulties while providing unitary adjudication,
20 economies of scale, and comprehensive supervision by a single court.

21 104. The nature of notice to the proposed Class is contemplated to be by
22 direct mail or, if such notice is not practicable, by the best notice practicable under
23 the circumstance including email, publication in major newspapers and/or on the
24 Internet.

25 **VI. TOLLING AND ESTOPPEL**

26 105. Any applicable statutes of limitations that might otherwise bar any of
27 Plaintiffs' claims and those of the Class are tolled by Defendant's knowing and
28 active concealment of the defect in the Class Vehicles, and the safety risks resulting
therefrom.

///

1 110. Defendant had a duty to disclose this material safety hazard because
2 reasonable consumers expect braking systems to perform their only intended and
3 reasonably expected function and purpose of slowing their vehicles with consistent
4 brake pedal feedback and consistently safe stopping distances. In failing to
5 adequately disclose this critical safety hazard, known to Defendant but not to
6 reasonable consumers like Plaintiffs and Class Members, Defendant has violated the
7 CLRA, including Civil Code §1770(a)(5) and (7).

8 111. None of the hard copy or electronic information provided by Defendant
9 to consumers discloses the hazard.

10 112. Were it not for Defendant's wrongful conduct in violation of the
11 CLRA, reasonable consumers including Plaintiffs and the Class would not have
12 purchased Class Vehicles. Instead, they would have purchased safe and reliable
13 vehicles with braking systems that are fit and safe for their only intended purpose.

14 113. The members of the Class have suffered injury in fact and lost money
15 as a direct result of Defendant's wrongful conduct. Each has expended money to
16 purchase a Class Vehicle, and would not have done so had they been aware of the
17 material safety omission alleged in this Complaint. Each will need to expend money
18 to repair or replace their Class Vehicle with safe braking systems adequately
19 designed to perform their only intended and expected function of consistently and
20 safely slowing their vehicle.

21 114. In light of the defectively designed braking system common to each
22 Class Vehicle, Defendant knew and has known of the hazard and dangerous
23 condition caused by consumers' use of and reliance upon the Class Vehicles.
24 Defendant knew and has known that if it disclosed the true facts about the danger
25 posed by their braking systems, consumers would not purchase Class Vehicles, and
26 Defendant would not be able to market and sell them. Defendant continues to
27 produce and sell Class Vehicles despite their known defective condition that risks
28 the lives of consumers and the public at large. Defendant has and continues to

1 recklessly and intentionally ignore public hazard caused by its omission and
2 concealment of the hazard posed by the defective braking systems present in Class
3 Vehicles.

4 115. The information referred to in Paragraphs 1-6 and 13-82, *supra*, as well
5 as Defendant's awareness from its prior experience in lawsuits alleging the same
6 defect, have all placed Defendant on notice of the danger posed by its Class
7 Vehicles. Yet, Defendant has ignored the hazards known to it and continues to make
8 profit-directed decisions in conscious disregard of the safety and well-being of
9 California residents as well as the non-residents who bought or leased Class
10 Vehicles in California.

11 116. Defendant's violations of the CLRA were willful and oppressive.

12 117. Plaintiffs provided Defendant with notice of its violations of the CLRA
13 pursuant to California Civil Code section 1782(a). The Notice was transmitted to
14 Defendant on October 16, 2018, by certified mail with return receipt. More than
15 thirty days have passed, and, to date, Defendant has failed to remedy its violations.
16 Therefore, Plaintiffs and members of the Class are entitled to seek monetary relief
17 for Defendant's violations of the CLRA.

18 118. Plaintiffs and members of the Class seek actual damages, punitive
19 damages, statutory damages, attorneys' fees, and any other legal relief proper under
20 the CLRA. *See* Cal. Civ. Code § 1780.

21 119. Should Plaintiffs' demanded legal relief be unavailable or prove
22 insufficient, Plaintiffs and the Class are alternatively entitled to equitable and
23 injunctive relief for conduct that violates the CLRA.

24 **SECOND CAUSE OF ACTION**

25 **(Violation of the California Unfair Competition Law)**

26 120. Plaintiffs adopt and incorporate all preceding paragraphs as if stated
27 fully herein.

28 ///

1 121. California Business & Professions Code Section 17200 (hereinafter
2 “Unfair Competition Law” or “UCL”) precludes unfair competition, *i.e.*, the
3 employment of any unlawful, unfair or fraudulent business acts or practices; and any
4 unfair, deceptive, untrue or misleading advertising violative of Cal. Bus. & Prof.
5 Code Section 17500. This prohibition extends to any act, omission or conduct, or
6 pattern of activity, engaged in within California which affects the rights of
7 consumers within the State of California and elsewhere.

8 122. In marketing and selling the Class Vehicles, and in otherwise causing
9 the Class Vehicles to be placed into the stream of commerce for use by consumers
10 in the United States with defective braking systems, and in continuing to conceal
11 this critical safety information regarding the dangers associated with the use of the
12 Class Vehicles, Defendant made available for consumer use a dangerous and
13 patently unsafe product which is not safely useable for its intended purpose.
14 Defendant was and remains obligated to disclose the hazard associated with the
15 Class Vehicles because of the public’s reasonable expectation that the Class
16 Vehicles would not under normal and expected use suddenly and unexpectedly lose
17 effective braking power. In failing to disclose this critical safety issue which was
18 known and readily apparent to Defendant but not to reasonable consumers,
19 including Plaintiffs and the Class, Defendant engaged in fraudulent conduct under
20 Cal. Bus. & Prof. Code §17200. Plaintiffs incorporate herein as though fully set
21 forth herein Paragraphs 1-6 and 13-82, *supra*, as particularized evidence of the
22 pattern of concealment perpetrated by Defendant against Plaintiffs and the Class.

23 123. The aforementioned conduct is unlawful within the meaning of the
24 UCL in that, among other things, it violates the CLRA to the extent that Defendant
25 represented, by the omission and concealment of critical safety information well-
26 known to Defendant, that the Class Vehicles: (a) had characteristics, uses or benefits
27 that they did not have in violation of Section 1770(a)(5) of the CLRA; and, (b) was
28 of a particular standard, quality or grade when it was of another in violation of

1 1770(a)(7) of the CLRA.

2 124. Defendant's conduct is unfair within the meaning of the UCL in that
3 the alleged consumer injury is substantial, creating an unreasonable risk of
4 catastrophic physical injury or death to any persons coming into contact with Class
5 Vehicles. There is no countervailing benefit to having or continuing to conduct itself
6 in the wrongful manner averred to herein.

7 125. Were it not for the unfair competition of Defendant, the Class would
8 not have purchased Class Vehicles.

9 126. Plaintiffs have suffered an injury in fact, including the loss of money
10 and/or property, as a result of Defendant's unfair, unlawful and/or deceptive
11 practices. In purchasing or leasing their vehicles, Plaintiffs relied on Defendant's
12 misrepresentations and/or omissions with respect to the safety, reliability and
13 dependability of the vehicles.

14 127. The members of the Class have and will continue to suffer injury in fact
15 and lose money as a direct result of Defendant's unfair competition in that each has
16 expended money to purchase Class Vehicles, and have or will be caused to expend
17 money to repair or replace their Class Vehicle with safe braking systems adequately
18 designed to perform their only intended and expected function of consistently and
19 safely slowing their vehicle.

20 128. The wrongful conduct alleged herein occurred, and continues to occur,
21 in the conduct of Defendant's business. Defendant's wrongful conduct is part of a
22 pattern or generalized course of conduct that is still perpetuated and repeated, both
23 in the State of California and nationwide.

24 129. Should Plaintiffs' demanded legal relief be unavailable or prove
25 insufficient, Plaintiffs seek appropriate equitable and injunctive relief in the
26 alternative pursuant to Fed. R. Civ. P. 8(a)(3), and request that this Court enjoin
27 Defendant from continuing its unfair, unlawful, and/or deceptive practices and
28 restore to Plaintiffs any money Defendant acquired through unfair competition

1 including, but not limited to, restitution and disgorgement.

2 **THIRD CAUSE OF ACTION**

3 **(Violation of the Song-Beverly Consumer Warranty Act**

4 **Breach of Implied Warranty)**

5 130. Plaintiffs adopt and incorporate all preceding paragraphs as if stated
6 fully herein.

7 131. The Class Vehicles are “consumer goods” within the meaning of Cal.
8 Civ. Code § 1791(a).

9 132. Defendant GM is a “manufacturer” within the meaning of Cal. Civ.
10 Code § 1791(j).

11 133. Defendant impliedly warranted to Plaintiffs that Class Vehicles were
12 “merchantable” within the meaning of Cal. Civ. Code §§ 1791.1(a) & 1792.

13 134. Cal. Civ. Code § 1791.1(a) states: “Implied warranty of
14 merchantability” or “implied warranty that goods are merchantable” means that the
15 consumer goods meet each of the following:

- 16 (1) Pass without objection in the trade under the contract description.
- 17 (2) Are fit for the ordinary purposes for which such goods are used.
- 18 (3) Are adequately contained, packaged, and labeled.
- 19 (4) Conform to the promises or affirmations of fact made on the container
20 or label.

21 135. The Class Vehicles would not pass without objection in the automotive
22 trade because the Class Vehicles do not conform with federal and California
23 standards, and were sold with known and dangerous braking defect, as described
24 above.

25 136. The Class Vehicles are not fit for ordinary purposes for which they are
26 used.

27 137. The Class Vehicles are not adequately labeled because the labeling
28 misrepresents that the vehicles are compliant with federal and California standards

1 or fails to disclose such noncompliance.

2 138. The Class Vehicles do not conform to the promises or affirmations of
3 fact made on their label because their label misrepresents their fuel efficiency.

4 139. Defendant's conduct deprived Plaintiffs of the benefit of their bargain
5 and have caused the Class Vehicles to be worth less than what Plaintiffs paid.

6 140. As a direct and proximate result of Defendant's conduct, Plaintiffs
7 received goods whose condition substantially impairs their value. Plaintiffs have
8 been damaged by the diminished value of the vehicles, the vehicles' malfunctioning,
9 and actual and potential increased maintenance and repair costs.

10 141. Plaintiffs have complied with all obligations under the warranty, or
11 otherwise have been excused from performance of said obligations as a result of
12 Defendant's conduct.

13 142. Under Cal. Civ. Code §§ 1791.1(d) & 1794, Plaintiffs are entitled to
14 damages and other legal relief including, but not limited to the purchase price of the
15 Class Vehicles or the overpayment or diminution in value of the Class Vehicles, and
16 attorney's fees and costs. Should Plaintiffs' demanded legal relief be unavailable or
17 prove insufficient, Plaintiffs seek appropriate equitable and injunctive relief in the
18 alternative pursuant to Fed. R. Civ. P. 8(a)(3).

19 **VII. RELIEF REQUESTED**

20 WHEREFORE, Plaintiffs and the Class pray judgment against Defendant GM
21 as follows:

22 a. For an order certifying this action as a class action pursuant to Rule 23
23 of the Federal Rules of Civil Procedure and appointing Plaintiffs as the
24 representatives of the Class and their counsel as Class Counsel;

25 b. For an order requiring Defendant General Motors LLC to buy back
26 Class Vehicles, refund the purchase price of Class Vehicles, or otherwise, free of
27 charge, replace the defective braking systems of Class Vehicles with defect-free
28 components and ensure that Class Vehicles comply with applicable safety standards;

- 1 c. For an order awarding Plaintiffs actual, statutory or any other form of
2 damages provided by statute or required by law;
- 3 d. For an order awarding Plaintiffs punitive damages in an amount
4 sufficient to serve as an appropriate punishment in light of all the facts and
5 circumstances, including Defendant’s financial condition;
- 6 e. Should Plaintiffs’ demanded legal relief be unavailable or prove
7 insufficient, Plaintiffs seek appropriate equitable and injunctive relief in the
8 alternative pursuant to Fed. R. Civ. P. 8(a)(3), including restitution, disgorgement or
9 any other equitable relief provided by statute or as the Court deems proper;
- 10 f. For an order awarding Plaintiffs pre-judgment and post-judgment
11 interest;
- 12 g. For an order awarding Plaintiffs reasonable attorney fees and costs of
13 suit, including expert witness fees; and
- 14 h. For an order awarding such other and further relief as this Court may
15 deem just and proper.

16 DATED: August 16, 2019

Respectfully submitted,

17 **KIESEL LAW LLP**

18
19
20 By: /s/ Melanie Meneses Palmer

21 Paul R. Kiesel
22 Jeffrey A. Koncius
23 Melanie Meneses Palmer

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1 **VIII. DEMAND FOR JURY**

2 Plaintiffs Scott Peckerar and Samantha Peckerar, individually and on behalf
3 of the Class, demand a trial by jury.

4 DATED: August 16, 2019

Respectfully submitted,

5 **KIESEL LAW LLP**

6
7
8 By: /s/ Melanie Meneses Palmer

9 Paul R. Kiesel
10 Jeffrey A. Koncius
11 Melanie Meneses Palmer

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Exhibit A

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 labor 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.



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

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

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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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



Brand:	Model:	Model Year:		VIN:		Engine:	Transmission:
		from	to	from	to		
Cadillac	Escalade	2015-2016		All	All	All	All
Chevrolet	Silverado 1500	2014-2016		All	All	All	All
Chevrolet	Suburban	2015-2016		All	All	All	All
Chevrolet	Tahoe	2015-2016		All	All	All	All
GMC	Sierra 1500	2014-2016		All	All	All	All
GMC	Yukon	2015-2016		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 held responsible for the content of external websites.

Condition/Concern

Warning: 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

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 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.

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Exhibit B

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VEHICLE COMPARISON TOOL

Compare safety information

EXHIBIT B

2015 CHEVROLET SUBURBAN 1500 SUV RWD



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MANUFACTURER COMMUNICATIONS

914 Manufacturer Communications

for 2015 CHEVROLET SUBURBAN 1500

FILTER MANUFACTURER COMMUNICATIONS BY AFFECTED COMPONENTS

- [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

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014-2016
CHEVROLET	SUBURBAN	2015-2016
CHEVROLET	TAHOE	2015-2016
GMC	SIERRA 1500	2014-2016
GMC	YUKON	2015-2016

1 Associated Document ▾

Service Bulletin Document

↓ [SB-10081053-2280.pdf](#) 95.829KB

Request Research (Services fees apply)

February 15, 2016 MANUFACTURER COMMUNICATION NUMBER: PIT5377D

Components: SERVICE BRAKES



February 10, 2016 MANUFACTURER COMMUNICATION NUMBER: PIT5361A

Components: SERVICE BRAKES



NHTSA ID Number: 10096208

Manufacturer Communication Number: PIT5361A

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.

19 Affected Products ▾

Vehicles

MAKE	MODEL	YEAR
------	-------	------

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 fees apply)

November 10, 2015 MANUFACTURER COMMUNICATION NUMBER: PIT5241C

Components: SERVICE BRAKES, ELECTRICAL SYSTEM



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Page 1 of 2

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2015 CADILLAC ESCALADE ESV SUV AWD



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COMPLAINTS

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16 Complaints

for 2015 CADILLAC ESCALADE ESV

FILTER COMPLAINTS BY AFFECTED COMPONENTS

All (16)

ELECTRICAL SYSTEM (1)

ENGINE (1)

ENGINE AND ENGINE COOLING (1)

EXTERIOR LIGHTING (1)

FUEL/PROPULSION SYSTEM (1)

POWER TRAIN (2)

SERVICE BRAKES (4)

STRUCTURE (1)

SUSPENSION (1)

UNKNOWN OR OTHER (6)

VEHICLE SPEED CONTROL (2)

VISIBILITY/WIPER (1)

August 18, 2016 NHTSA ID NUMBER: 10896962



Components: SERVICE BRAKES

NHTSA ID Number: 10896962

Incident Date August 2, 2016

Consumer Location HARRIMAN, NY

Vehicle Identification Number 1GYS4SKJ4FR****

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

DEATHS 0

BRAKES COMPLETELY FAILED. I PULLED INTO TRAIN PARKING SPOT AND THE CARS WOULD NOT STOP. I HAD TO KEEP PUMPING THE BRAKES AND EVENTUALLY IT JUST STOPPED. I TRIED IT GAIN AND THE BRAKES WERE HARD AND COULDN'T PUSH THEM DOWN. I AM SO LUCKY THAT I WAS NOT ON A HIGHWAY GOING FAST WITH MY KIDS IN THE CAR.

ADILLAC SAID I NEEDED THE HYDRO BOOST REPLACED.

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015

 Request Research (Services fees apply)

July 29, 2016 NHTSA ID NUMBER: 10891627



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



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 ▾

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

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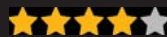


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7
RECALLS

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COMPLAINTS 96



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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)
- 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)

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 I90 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

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 No

FIRE No

INJURIES 0

DEATHS 0

TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE EXITING THE PARKING LOT AT 5 MPH, THE BRAKES FAILED TO WORK WITHOUT WARNING. THE 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 STATE HWY 16, FREDERICKSBURG, TX 78624) WHERE IT WAS DIAGNOSED THAT THE 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 ^**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 1GNSKCKC0FR****

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

THE BRAKES ON MY 2015 CHEVY SUBURBAN ARE LOCKING WHEN DRIVING A LOW SPEED. THE PROBLEM STARTED ALL OF THE SUDDEN WHILE DRIVING UNDER DRY ROAD 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

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 Research (Services fees apply)

June 17, 2017 NHTSA ID NUMBER: 10995718

Components: SERVICE BRAKES

NHTSA ID Number: 10995718

Incident Date June 17, 2017

Consumer Location MCQUEENEY, TX

Vehicle Identification Number 1GNSCJJC3FR****

Summary of Complaint

CRASH	No	BRAKE BOOSTER WENT OUT WHILE DRIVING WITH MY CHILDREN IN THE CAR!
FIRE	No	
INJURIES	0	
DEATHS	0	

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

 Request Research (Services fees apply)

June 14, 2017 NHTSA ID NUMBER: 10995134

Components: SERVICE BRAKES

NHTSA ID Number: 10995134**Incident Date** October 14, 2016**Consumer Location** GAINESVILLE, FL**Vehicle Identification Number** 1GNSCJJC4FR******Summary of Complaint**

CRASH	No	<p>BRAKES STOPPED WORKING . <u>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.</u></p>
FIRE	No	
INJURIES	0	
DEATHS	0	

I HAVE ADDITIONAL COMPLAINTS ABOUT THIS VEHICLHE. 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 (Services fees apply)
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COMPLAINTS

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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)

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)

April 10, 2017 NHTSA ID NUMBER: 10971549



Components: SERVICE BRAKES, ENGINE, VEHICLE SPEED CONTROL

NHTSA ID Number: 10971549

Incident Date April 8, 2017

Consumer Location LORTON, VA

Vehicle Identification Number 1GNSKJKCXHR****

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

DEATHS 0

I WAS ON SLOPE HILL. MY BRAKES ARE NOT RESPONDING. I PUT IN NEW BRAKES 2 MONTHS AGO AND BRAKES NOT RESPONDING? MY CAR ALMOST WENT DOWN THE HILL. I CALLED ROADSIDE ASSISTANCE AND HAD THEM TOWED MY CAR TO DEALERSHIP. THEY FOUND THE ISSUE VACUUM PUMP BROKE. ALSO MY TRANSMISSION HAVING ISSUE SINCE 2 MONTHS. THEY STILL HAVEN'T FOUND ISSUES. I CAN'T CONTROL MY SPEED AND ENGINE GIVES A KICK WHEN ENTERING HIGHWAY. THEY WON'T REPAIR THIS ISSUE BECAUSE THEIR "MECHANICS" CANNOT FIND THE ISSUE. THIS IS THIS WORST VEHICLE TO DRIVE AND UNSAFE FOR DRIVERS AND PASSENGERS.

1 Affected Product ▾

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

 Request Research (Services fees apply)

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 ▾**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!

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
FIRE No
INJURIES 0
DEATHS 0

I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACED.....THIS IS VERY DANGEROUS.

1 Affected Product ^**Vehicle**

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

Vehicle Identification Number 1GN5CJJC8FR****

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

DEATHS 0

TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. THE CONTACT STATED THAT 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 IT WAS DIAGNOSED THAT THE BRAKE BOOSTER FAILED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 67,000.

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

Request Research (Services fees apply)

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2015
CHEVROLET SUBURBAN 1500
 SUV RWD



OVERALL SAFETY RATING



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COMPLAINTS

RECALLS

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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 \(1\)](#)
[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



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

FIRE 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

INJURIES 1
DEATHS 0

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)

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**2015
GMC YUKON DENALI XL 1500**
SUV 4WD



OVERALL SAFETY RATING



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**2015
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SUV RWD



OVERALL SAFETY RATING



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COMPLAINTS 133



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COMPLAINTS

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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 \(2\)](#)

October 5, 2017 NHTSA ID NUMBER: 11031984



Components: SERVICE BRAKES

NHTSA ID Number: 11031984

Incident Date October 4, 2017

Consumer Location MACOMB, MI

Vehicle Identification Number 1GNSKBKC3FR****

Summary of Complaint

CRASH Yes
FIRE No
INJURIES 0
DEATHS 0

HARD BRAKE PEDAL, INCREASED EFFORT IS NEEDED TO DEPRESS BRAKE PEDAL. MOST COMMONLY AT SPEEDS <35 MPH. OFTEN VEHICLE DOES NOT WANT TO STOP. VEHICLE WAS IN MODERATE MORNING RUSH HOUR TRAFFIC. VEHICLE IN FRONT STOPPED QUICKLY FROM 40 MPH. TRIED PRESSING BRAKE PEDAL ON 2015 TAHOE TO STOP, PEDAL WAS EXTREMELY HARD AND VEHICLE WOULD NOT STOP.

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	TAHOE	2015

Request Research (Services fees apply)

September 25, 2017 NHTSA ID NUMBER: 11025403



Components: SERVICE BRAKES

NHTSA ID Number: 11025403**Incident Date** September 22, 2017**Consumer Location** TIFTON, GA**Vehicle Identification Number** 1GN5CBKC4FR******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	TAHOE	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

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 ▾

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

Vehicle Identification Number 1GNSKBKC0FR****

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

DEATHS 0

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

1 Affected Product ▾

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	TAHOE	2015

Request Research (Services fees apply)

August 29, 2017 NHTSA ID NUMBER: 11020372



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 ^**Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	TAHOE	2015

 Request Research (Services fees apply)
[← prev](#)

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2015
CHEVROLET TAHOE
 SUV 4WD

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 1GN5CBKC0FR****

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 ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	TAHOE	2015

1 Associated Document ^

EVOQ Document

United States Department of Transportation



Look up another vehicle

Year Make Model or VIN

go

VEHICLE COMPARISON TOOL

Compare safety information

2016 CHEVROLET SUBURBAN 1500 SUV 4WD



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4
RECALLS

INVESTIGATIONS 0

COMPLAINTS 23



OVERALL SAFETY RATING

Safety Ratings.

NHTSA's 5-Star Safety Ratings help consumers compare vehicle safety when searching for a car. More stars mean safer cars.

[Learn about crash test ratings](#) →

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

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

CRASH No

FIRE No

INJURIES 0

DEATHS 0

TL* THE CONTACT OWNS A 2016 CHEVROLET SUBURBAN. WHILE DRIVING 30 MPH, THE VEHICLE FAILED TO ACCELERATE. ALSO, THE BRAKES FAILED TO RESPOND WHEN THE BRAKE PEDAL WAS DEPRESSED AND THE VEHICLE STALLED. THE FAILURE RECURRED TWO MORE TIMES. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURES. THE APPROXIMATE FAILURE MILEAGE WAS 14,000.

1 Affected Product ▾

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2016

 Request Research (Services fees apply)

United States Department of Transportation



Look up another vehicle

Year Make Model or VIN

go

VEHICLE COMPARISON TOOL

Compare safety information

2014 CHEVROLET SILVERADO 1500 PU/RC RWD



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17
RECALLS

INVESTIGATIONS 0

COMPLAINTS 452



OVERALL SAFETY RATING

Safety Ratings.

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[Learn about crash test ratings](#) →

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)

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 ▾

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

Request Research (Services fees apply)

September 11, 2017 NHTSA ID NUMBER: 11022580

Components: ELECTRICAL SYSTEM, SERVICE BRAKES, ELECTRONIC STABILITY CONTROL



August 12, 2017 NHTSA ID NUMBER: 11014788

Components: SERVICE BRAKES, UNKNOWN OR OTHER



July 18, 2017 NHTSA ID NUMBER: 11006271

Components: SERVICE BRAKES



NHTSA ID Number: 11006271

Incident Date July 18, 2017

Consumer Location KYLE, TX

Vehicle Identification Number N/A

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

DEATHS 0

WHILE DRIVING MY 2014 SILVERADO MY BRAKES BECAME HARD TO USE. I HAD TO PUSH HARD WITH BOTH GET TO GET THEM TO WORK. THEN I DROVE THE REST OF THE WAY AND THEY WERE FINE UNTIL I TRIED TO PARK AND IT HAPPENED AGAIN. I FOUND ON A FORUM THAT THIS IS A VACCUME PUMP ISSUE THAT IS COMMON IN THIS YEAR.

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

Request Research (Services fees apply)

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

DEATHS 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**

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

 Request Research (Services fees apply)[← prev](#)

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**2014
CHEVROLET SILVERADO 1500
PU/RC RWD**

**OVERALL SAFETY RATING**

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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)

June 21, 2017 NHTSA ID NUMBER: 11000538

Components: SERVICE BRAKES

NHTSA ID Number: 11000538

Incident Date May 2, 2017

Consumer Location ROSHARON, TX

Vehicle Identification Number N/A

Summary of Complaint

CRASH No
 FIRE No
INJURIES 0
 DEATHS 0

BRAKE PEDAL IS HARD TO PRESS IN MAKING VEHICLE HARD TO STOP

1 Affected Product ▾

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

 Request Research (Services fees apply)

June 4, 2017 NHTSA ID NUMBER: 10993037

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**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

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



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Recently Searched

**2014
CHEVROLET SILVERADO 1500**
PU/RC RWD



OVERALL SAFETY RATING



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**2016
CADILLAC ESCALADE**
SUV RWD

Not been rated

OVERALL SAFETY RATING



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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 \(20\)](#)

January 17, 2017 NHTSA ID NUMBER: 10945715

Components: SERVICE BRAKES, STEERING

NHTSA ID Number: 10945715

Incident Date January 16, 2017

Consumer Location MURFREESBORO, TN

Vehicle Identification Number 3GCUKREH6EG****

Summary of Complaint

CRASH No
FIRE No
INJURIES 0
DEATHS 0

TL* THE CONTACT OWNS A 2014 CHEVROLET SILVERADO 1500. WHILE DRIVING 20 MPH, THE POWER STEERING SEIZED WITHOUT WARNING. IN ADDITION, THE BRAKES LOCKED UP WITHOUT WARNING. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 90,000.

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

 Request Research (Services fees apply)

January 11, 2017 NHTSA ID NUMBER: 10944290

Components: SERVICE BRAKES

NHTSA ID Number: 10944290

Incident Date December 28, 2016

Consumer Location SPARTA, NJ

Vehicle Identification Number 3GCUKREC9EG****

Summary of Complaint

CRASH No

FIRE No

INJURIES 0

DEATHS 0

I WAS TRAVELING ON A HIGHWAY DOING 55 MPH. I SAW THE LIGHT TURN RED AND APPLIED MY BRAKES. THERE WERE NO BRAKES AS THE PEDAL WENT TO THE FLOOR. FORTUNATELY WE WERE ABLE TO ROLL TO A STOP WITHOUT CRASHING INTO THE CAR IN FRONT. I WAS TOWED TO MY DEALER WHERE THEY DIAGNOSED IT AS A BRAKE BOOSTER FAILURE. THIS IS JUST NOT RIGHT AND SEEMS TOO DANGEROUS FOR SUCH A NEW VEHICLE.

1 Affected Product ▾**Vehicle**

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

 Request Research (Services fees apply)

August 11, 2016 NHTSA ID NUMBER: 10895114

Components: SERVICE BRAKES

April 18, 2016 NHTSA ID NUMBER: 10860090

Components: SEAT BELTS, SERVICE BRAKES, SUSPENSION

January 20, 2016 NHTSA ID NUMBER: 10821233

Components: SERVICE BRAKES[← prev](#)

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[next →](#)**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

**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 1GCRREC8EZ****

Summary of Complaint

CRASH	Yes
FIRE	No
INJURIES	1
DEATHS	0

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. 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 ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO	2014

Request Research (Services fees apply)

January 16, 2015 NHTSA ID NUMBER: 10672998

Components: AIR BAGS, VEHICLE SPEED CONTROL, SERVICE BRAKES

NHTSA ID Number: 10672998

Incident Date January 14, 2015

Consumer Location FORT SMITH, AR

Vehicle Identification Number 1GCRCREC8EZ****

Summary of Complaint

CRASH Yes
 FIRE No
 INJURIES 1
 DEATHS 0

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

1 Affected Product ^

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SILVERADO	2014

Request Research (Services fees apply)

November 20, 2014 NHTSA ID NUMBER: 10659651

Components: ELECTRICAL SYSTEM, SERVICE BRAKES

August 13, 2014 NHTSA ID NUMBER: 10622123

Components: POWER TRAIN, STEERING, SERVICE BRAKES

Exhibit D

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,


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 <tremell.walker@gm.com>
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.



Exhibit E



Bulletin No.: PIT5361D
Published date: 09/13/2018

Preliminary Information

PIT5361D Diagnostic Tip - Additional Brake Pedal Effort

Product Investigation Review Required

Models

Brand:	Model:	Model Years:	VIN:		Engine:	Transmissions:
			from	to		
Cadillac	Escalade	2015 - 2019	All	All	All	All
Chevrolet	Silverado 1500	2014 - 2018	All	All	All	All
Chevrolet	Silverado LD	2019	All	All	All	All
Chevrolet	Suburban	2015 - 2019	All	All	All	All
Chevrolet	Tahoe	2015 - 2019	All	All	All	All
GMC	Sierra 1500	2014 - 2018	All	All	All	All
GMC	Sierra Limited	2019	All	All	All	All
GMC	Yukon	2015 - 2019	All	All	All	All

Supersession Statement

This PI was superseded to update the Model Years, Condition/Concern, Recommendation and Warranty sections. Please discard PIT5361C.

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.

Recommendations / Instructions

When following the SI diagnostics chart for "Brake Pedal Excessive Effort" it may lead to the "Brake System Vacuum Source Test". While performing this test, if low vacuum is found, inspect the vacuum pump belt. If no belt issues are found, suspect a faulty vacuum pump.

If the vacuum pump is found to be at fault, inspect the vacuum line and brake booster for the presence of engine oil.

IMPORTANT: The vacuum pump is belt-driven and mounted to the side of the engine block and is lubricated by pressurized engine oil.

If NO engine oil is found, then ONLY replace the vacuum pump itself.

If engine oil is found, it is important that 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

NOTE: If the vacuum pump failed, please review the customer's maintenance records for proper oil change intervals. Poorly maintained vehicles can contribute to vacuum pump failures.

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
4023850	Vacuum Pump Assembly Replacement	Use Published Time
2480118 *	Replace vacuum pump, 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



Exhibit F



U.S. Department of Transportation
National Highway Traffic Safety Administration

ODI RESUME

OFFICE OF DEFECTS INVESTIGATION
SAFETY
NHTSA
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
 Authentic US Government Information
 National Highway Traffic Safety Administration
 uses a digital certificate to ensure
 the content has remained unchanged

Investigation: PE 18-012
Date Opened: 11/20/2018
Investigator: Chris Lash
Approver: Stephen Ridella
Subject: Brake Vacuum Pump Failure
Reviewer: Gregory Magno

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: General Motors LLC
Products: 2014-2016 GM Pickups / SUVs (K2XX Platform, 1500 Series)
Population: 2,732,000 (Estimated)
Problem Description: The power brake vacuum pump can degrade causing the brake pedal to become hard resulting in extended stopping distance.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	111	TBD	TBD
Crashes/Fires:	9	TBD	TBD
Injury Incidents:	2	TBD	TBD
Number of Injuries:	2	TBD	TBD
Fatality Incidents:	0	TBD	TBD
Number of Fatalities:	0	TBD	TBD

ACTION / SUMMARY INFORMATION

Action: Open a preliminary evaluation (PE)

Summary:

The Office of Defects Investigation (ODI) has received 111 reports of hard brake pedal effort accompanied by extended stopping distance in model years (MY) 2014 to 2016 General Motors (GM) light trucks based on the K2XX platform, 1500 series Pickup Trucks and Sport Utility Vehicles (Silverado, Sierra, Suburban, Yukon, Tahoe, Escalade). These conditions are attributed to deterioration of the engine-driven brake assist vacuum pump. Nine of these incidents included vehicles incurring damage as a result colliding with another vehicle or fixed object at low speeds.

The brake assist vacuum pump is driven by an accessory belt on the engine and serves as the source of power brake vacuum in the subject vehicles. Over time, the pump's capacity to generate vacuum may deteriorate. The subject vehicles receive supplemental hydraulic brake assist from the ABS system, albeit at lower levels than the vacuum-powered primary system. If the brake assist vacuum pump fails to operate as intended, the amount of brake power assist supplied to the driver can be significantly reduced, extending the subject vehicle stopping distance.

A Preliminary Evaluation has been opened to assess the scope, frequency, circumstances, and safety consequences of the alleged defect.

The ODI complaints cited above can be viewed at www.nhtsa.gov under the following ODI identification numbers: 11143759, 11143710, 11143349, 11142826, 11142685, 11142544, 11142374, 11140624, 11140321, 11139980, 11139614, 11139210, 11132847, 11132455, 11131903, 11131066, 11128191, 11124506, 11124227, 11123463, 11121979, 11121611, 11102448, 11101165, 11099906, 11121172, 11119847, 11118984, 11118870, 11111834, 11115151, 11114340, 11113548, 11112722, 11110640, 11110393, 11110264, 11105051, 11104203, 11103906, 11104097, 11101822, 11102108, 11100297, 11099907, 11098785, 11097335, 11094026, 11011875, 11090358, 11089691, 11089278, 11089173, 11088926, 11084934, 11084610, 11082247, 11078820, 11072654, 11065323,

11056319, 11081406, 11072905, 11075730, 11067395, 11056635, 11055292, 11021419, 11065274, 11064605,
11064080, 11063087, 11056908, 11054734, 11054123, 11053444, 11067234, 11048544, 11048333, 11046974,
11045731, 11044677, 11031984, 11030722, 11030016, 11025403, 11022709, 11020372, 11003691, 10995134,
11047239, 11043192, 11034792, 11034518, 11033883, 11032103, 11030685, 11021601, 11006271, 11002554,
11001423, 10991595, 11013706, 10984684, 10967071, 11119907, 11083289, 11062858, 11047981, 11041607,
11021253

Exhibit G



U.S. Department of Transportation
**National Highway Traffic Safety
 Administration**



1200 New Jersey Avenue SE.
 Washington, DC 20590

FEB 07 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brian Latouf, Director
 Field Product Investigations and Evaluations
 General Motors Vehicle Engineering Center
 30001 Van Dyke
 Mail Code: 480-210-2V
 Warren, Michigan 48090

NEF-101cl
 PE18-012

Dear Mr. Latouf:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has opened a Preliminary Evaluation (PE18-012) to investigate allegations of Brake Vacuum Assist Pump failures in certain model year (MY) 2014-2016 Chevrolet, GMC and Cadillac light trucks and SUVs manufactured by General Motors LLC (GM)

This office has received 487 reports of brake vacuum assist pump failures in above listed subject vehicles. Drivers allege that the brake pedal becomes hard to depress and a commensurate increase in vehicle stopping distance with no warning. A copy of each of the reports is enclosed for your information.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** All MY2014 – 2016 Silverado/Sierra, Escalade ESV, Escalade EXT, Suburban, Tahoe, and Yukon XL, 1500 series model trucks manufactured with a belt-driven brake vacuum assist pump for sale or lease in the United States, including, but not limited to, the District of Columbia, and current U.S. territories and possessions.
- **Subject component:** Belt- driven brake vacuum assist pumps used in the subject vehicles.
- **Alleged defect:** Any malfunction of the subject component that extends vehicle stopping distance or diminishes braking feel or effectiveness by the vehicle operator.
- **GM:** General Motors LLC, all of its past and present officers and employees, whether assigned to its principal offices or any of its field or other locations, including all of its divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of GM (including all business units and persons previously referred to), who are, in or after 1995, were

involved in any way with any of the following related to the alleged defect in the subject vehicles:

- a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Document:** “Document(s)” is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations, computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by GM, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, “document(s)” also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by GM or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms “claim,” “consumer complaint,” “dealer field report,” “field report,” “fire,” “fleet,” “good will,” “make,” “model,” “model year,” “notice,” “property damage,” “property damage claim,” “rollover,” “type,” “warranty,” “warranty adjustment,” and “warranty claim,” whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as GM has previously provided a document to ODI, GM may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After GM’s response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model and model year, the number of subject vehicles GM has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by GM, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Subject component supplier name, part number and design version installed as original equipment;
 - f. Date of manufacture;
 - g. Date warranty coverage commenced; and
 - h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled “PRODUCTION DATA.”

2. State the number of each of the following, received by GM, or of which GM is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury or fatality;
 - d. Reports involving a fire;
 - e. Property damage claims;
 - f. Third-party arbitration proceedings where GM is or was a party to the arbitration; and
 - g. Lawsuits, both pending and closed, in which GM is or was a defendant or codefendant.

For subparts “a” through “g” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “g” provide a summary description of the alleged problem and causal and contributing factors and GM’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “f” and “g” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

3. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:
 - a. GM’s file number or other identifier used;
 - b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
 - d. Vehicle’s VIN;
 - e. Vehicle’s make, model and model year;
 - f. Vehicle’s mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether a fire is alleged;
 - k. Whether property damage is alleged;
 - l. Number of alleged injuries, if any; and
 - m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled “REQUEST NUMBER TWO DATA.”

4. Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method GM used for organizing the documents. Describe in detail the search methods and search criteria used by GM to identify the items in response to Request No. 2.
5. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by GM to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. GM's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number(s);
- h. Problem code(s);
- i. Diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

6. Describe in detail the search methods and search criteria used by GM to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

State, by make and model year, the terms of the new vehicle warranty coverage offered by GM on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that GM offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

7. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that GM has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that GM is planning to issue within the next 120 days.
8. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, GM. For each such action, provide the following information:

- a. Action title or identifier;
- b. The actual or planned start date;
- c. The actual or expected end date;
- d. Brief summary of the subject and objective of the action;
- e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
- f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

9. Describe all modifications or changes made by, or on behalf of, GM in the design, material composition, manufacture, quality control, supply, or installation of the subject component, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
 - a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part number(s) (service and engineering) of the original component;
 - e. The part number(s) (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that GM is aware of which may be incorporated into vehicle production within the next 120 days.

10. State the number of each of the following that GM has sold that may be used in the subject vehicles by component name, supplier name, part number (both service and engineering/production), model and model year of the vehicle in which it is used and month/year of sale (including the cut-off date for sales, if applicable):
 - a. Subject component; and
 - b. Any subject components that have been released, or developed, by GM for use in service repairs to the subject component/assembly.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which GM is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

11. Furnish GM's assessment of the alleged defect in the subject vehicle, including:

- a. The causal or contributory factor(s);
- b. The failure mechanism(s);
- c. The failure mode(s);
- d. The risk to motor vehicle safety that it poses; and
- e. What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
- f. The reports included with this inquiry.

Legal Authority for This Request

This letter is being sent to GM pursuant to 49 U.S.C. § 30166, which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information.

Civil Penalties

GM's failure to respond promptly and fully to this letter could subject GM to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) The Vehicle Safety Act, as amended, 49 U.S.C. § 30165(a)(3), provides for civil penalties of up to \$21,000 per violation per day, with a maximum of \$105,000,000 for a related series of daily violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by Fixing America's Surface Transportation Act (the "FAST Act"), Pub. L. 114-94, § 24110(a)(2), 129 Stat. 1312 (Dec. 4, 2015)). This includes failing to respond completely, accurately, and in a timely manner to ODI information requests.

If GM cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, GM does not submit one or more requested documents or items of information in response to this information request, GM must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Confidential Business Information

All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office. In addition, do not submit any business confidential information in the body of the letter submitted to this office. Please refer to PE18-012 in GM's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel.

If GM claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, GM must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. GM is required to **submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted.** Please remember that the phrase “ENTIRE PAGE CONFIDENTIAL BUSINESS INFORMATION” or “CONTAINS CONFIDENTIAL BUSINESS INFORMATION” (as appropriate) must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 49 CFR 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats. See 49 CFR 512.6(c) (as amended by 72 Fed. Reg. 59434 (October 19, 2007)).

If you have any questions regarding submission of a request for confidential treatment, contact Otto Matheke, Senior Attorney, Office of Chief Counsel at otto.matheke@dot.gov or (202) 366-5253.

Due Date

GM's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **March 27, 2019**. GM's response must include all non-confidential attachments and a redacted version of all documents that contain confidential information. If GM finds that it is unable to provide all of the information requested within the time allotted, GM must request an extension from me at (202) 366-5226 no later than five business days before the response due date. If GM is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information GM then has available, even if an extension has been granted.

Please send email notification to Chris Lash at chris.lash@dot.gov and to ODI_IRresponse@dot.gov when GM sends its response to this office and indicate whether there is confidential information as part of GM's response.

If you have any technical questions concerning this matter, please call Chris Lash of my staff at (202) 366-2370.

Sincerely,



Gregory Magno, Chief
Vehicle Defects Division A
Office of Defects Investigation

Enclosure 1: Copies of the subject reports referenced in the introduction of this letter identified by ODI reference numbers.

Enclosure 2: Disk containing data bases.

	1	2	3	4	5	6	7	8	9	10
1	11173052	11173036	11172775	11172741	11172587	11172435	11172362	11172341	11172215	11172145
2	11172000	11171742	11171487	11171339	11171277	11171262	11171169	11171155	11171099	11171079
3	11171028	11170955	11170699	11170825	11170676	11170662	11170564	11170527	11170633	11170425
4	11170356	11170401	11169960	11169868	11169844	11169956	11166663	11166353	11166193	11166155
5	11166038	11165996	11165980	11165943	11165931	11165893	11164941	11164930	11164844	11164737
6	11164739	11164598	11164578	11164466	11164418	11164321	11164170	11163659	11163484	11163288
7	11162586	11162427	11162421	11162400	11162580	11162377	11162275	11162271	11162172	11162147
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11	11155321	11155340	11155359	11155214	11155202	11155154	11155144	11154920	11154888	11154829
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13	11154520	11154516	11154507	11154493	11154483	11154456	11154452	11154427	11154407	11154441
14	11154492	11154333	11154310	11154290	11154281	11154266	11154264	11154234	11154198	11154191
15	11154175	11154173	11154146	11154141	11154260	11154182	11154195	11154228	11154316	11154127
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33	11114005	11113548	11113270	11112722	11111834	11111748	11111160	11110640	11110451	11110393
34	11110264	11110372	11110010	11109842	11105051	11104203	11104097	11103950	11103906	11102448
35	11102108	11101822	11101726	11101165	11100502	11100297	11099907	11099906	11098785	11098687
36	11097335	11097151	11094120	11094113	11094026	11093803	11091924	11091404	11090895	11090809

37	11090358	11090220	11089691	11089278	11089173	11088926	11084934	11084610	11084250	11083289
38	11082296	11082247	11081459	11081406	11080953	11080863	11080286	11078952	11078931	11078820
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40	11067234	11066885	11065274	11065323	11064698	11064605	11064326	11064080	11063192	11063087
41	11062858	11062072	11060963	11060689	11058306	11056908	11056635	11056319	11055488	11055292
42	11055232	11054734	11054559	11054565	11054123	11053948	11053444	11053431	11052302	11048544
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45	11033883	11033911	11033088	11032103	11031984	11030722	11030685	11030450	11030016	11025403
46	11022709	11021601	11021419	11021253	11020267	11020372	11020065	11018809	11014072	11013706
47	11013363	11011875	11006565	11006271	11005111	11003691	11002554	11001938	11001423	10995718
48	10995134	10993922	10992868	10992092	10991595	10984684	10984491	10967071	10956664	10930061
49	10928550	10919906	10911185	10904757	10896962	10826151	10818785			