

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, et al.,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
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**DECLARATION OF DEBORAH J. NEWMAN IN SUPPORT OF THE
PARTICIPATING UNITHOLDERS' AND GUC TRUST ADMINISTRATOR'S
OPENING MEMORANDUM OF LAW RESPECTING
THE EQUITABLE MOOTNESS THRESHOLD ISSUE**

I, Deborah J. Newman, declare as follows:

1. I am a partner at the law firm of Akin Gump Strauss Hauer & Feld LLP, counsel for certain unaffiliated holders (the "**Participating Unitholders**") of beneficial units of the Motors Liquidation Company GUC Trust.

2. I respectfully submit this Declaration in Support of the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue.

3. Attached hereto as **Exhibit A** is a true and correct copy of a CRT Capital Group LLC ("**CRT Capital**") analyst report dated October 22, 2013.

4. Attached hereto as **Exhibit B** is a true and correct copy of a CRT Capital analyst report dated November 11, 2013.

5. Attached hereto as **Exhibit C** is a true and correct copy of a letter from General Motors LLC ("**New GM**") to the National Highway Traffic Safety Administration ("**NHTSA**") dated February 24, 2014 regarding Recall No. 14V-047.

6. Attached hereto as **Exhibit D** is a true and correct copy of a letter from New GM to NHTSA dated March 11, 2014 regarding Recall No. 14V-047.

7. Attached hereto as **Exhibit E** is a true and correct copy of a letter from New GM to NHTSA dated April 11, 2014 regarding Recall No. 14V-047.

8. Attached hereto as **Exhibit F** is a true and correct copy of a letter from New GM to NHTSA dated July 2, 2014 regarding Recall No. 14V-355.

9. Attached hereto as **Exhibit G** is a true and correct copy of a letter from New GM to NHTSA dated July 16, 2014 regarding Recall No. 14V-400.

10. Attached hereto as **Exhibit H** is a true and correct copy of a letter from New GM to NHTSA dated July 16, 2014 regarding Recall No. 14V-394.

11. Attached hereto as **Exhibit I** is a true and correct copy of a letter from New GM to NHTSA dated August 7, 2014 regarding Recall No. 14V-490.

12. Attached hereto as **Exhibit J** is a true and correct copy of a letter from NHTSA to New GM dated October 3, 2014 regarding Recall No. 14V-540.

13. Attached hereto as **Exhibit K** is a true and correct copy of a letter from New GM to NHTSA dated March 31, 2014 regarding Recall No. 14V-117.

14. Attached hereto as **Exhibit L** is a true and correct copy of a letter from New GM to NHTSA dated March 31, 2014 regarding Recall No. 14V-118.

15. Attached hereto as **Exhibit M** is a true and correct copy of a letter from New GM to NHTSA dated March 31, 2014 regarding Recall No. 14V-153.

16. Attached hereto as **Exhibit N** is a true and correct copy of a letter from New GM to NHTSA dated April 29, 2014 regarding Recall No. 14V-224.

17. Attached hereto as **Exhibit O** is a true and correct copy of a letter from New GM to NHTSA dated May 22, 2014 regarding Recall No. 14V-224.

18. Attached hereto as **Exhibit P** is a true and correct copy of a letter from New GM to NHTSA dated May 28, 2014 regarding Recall No. 14V-251.

19. Attached hereto as **Exhibit Q** is a true and correct copy of a letter from New GM to NHTSA dated May 28, 2014 regarding Recall No. 14V-252.

20. Attached hereto as **Exhibit R** is a true and correct copy of a letter from New GM to NHTSA dated May 30, 2014 regarding Recall No. 14V-266.

21. Attached hereto as **Exhibit S** is a true and correct copy of a letter from New GM to NHTSA dated June 25, 2014 regarding Recall No. 14V-261.

22. Attached hereto as **Exhibit T** is a true and correct copy of a letter from New GM to NHTSA dated June 25, 2014 regarding Recall No. 14V-260.

23. Attached hereto as **Exhibit U** is a true and correct copy of a letter from New GM to NHTSA dated June 11, 2014 regarding Recall No. 14V-318.

24. Attached hereto as **Exhibit V** is a true and correct copy of a letter from New GM to NHTSA dated July 2, 2014 regarding Recall No. 14V-404.

25. Attached hereto as **Exhibit W** is a true and correct copy of a letter from New GM to NHTSA dated July 2, 2014 regarding Recall No. 14V-407.

26. Attached hereto as **Exhibit X** is a true and correct copy of a letter from New GM to NHTSA dated July 28, 2014 regarding Recall No. 14V-460.

27. Attached hereto as **Exhibit Y** is a true and correct copy of a letter from NHTSA to New GM dated October 3, 2014 regarding Recall No. 14V-542.

28. Attached hereto as **Exhibit Z** and **Exhibit AA** are true and correct copies of the transcripts of a June 26, 2014 Today Show interview of New GM Chief Executive Officer Mary Barra.

29. Attached hereto as **Exhibit BB** is a true and correct copy of the relevant excerpts of the transcript of the hearing dated May 2, 2014 in *In re Motors Liquidation Company*, 09-50026 (REG).

30. Attached hereto as **Exhibit CC** is a true and correct copy of the relevant excerpts of the transcript of the hearing dated July 2, 2014 in *In re Motors Liquidation Company*, 09-50026 (REG).

31. Attached hereto as **Exhibit DD** is a true and correct copy of the relevant excerpts of the transcript of the hearing dated August 18, 2014 in *In re Motors Liquidation Company*, 09-50026 (REG).

32. Attached hereto as **Exhibit EE** is a true and correct copy of a Bloomberg News article titled "GM Could Face \$2 Billion Tab If Bankruptcy Shield Falls," dated November 5, 2014.

33. Attached hereto as **Exhibit FF** is a true and correct schedule of the volume, closing price and market value of GUC Trust Units traded between June 14, 2012 and October 21, 2014, based on information derived from Bloomberg Finance L.P.

34. I declare under penalty of perjury that to the best of my knowledge, the foregoing is true and correct.

Dated: November 5, 2014
New York, New York

/s/ Deborah J. Newman
Deborah J. Newman

EXHIBIT A

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MOTORS LIQUIDATION COMPANY (MTLQU, NR, PT: NONE, CLOSE: \$34.35)

Double-Digit Un-Correlated Return Potential

October 22, 2013

Research Update NR - PT: None

We are revising our valuation of the Motors Liquidation GUC Trust (the “GUC Trust” or “MTLQU”) Units (the “Units”) from \$36/unit to \$39/unit to reflect downward revisions to our estimates for both claims (now \$31.897 billion) and the expected costs of the liquidation (now \$27.5 million). Our \$39/Unit target is based on yesterday’s closing price for GM’s Common Shares (\$35.50/share), Class A Warrants (\$25.97/Warrant), and Class B Warrants (\$18.47/Warrant)(together, the “GM Securities”) and the associated tax liabilities (now \$397.8 million). Our valuation is 15% above yesterday’s closing price of \$34.35/Unit.

Investors seeking un-correlated returns may be particularly interested in the GUC Trust given that it is relatively large (with a market capitalization in excess of \$1 billion) and liquid.

The Nova Scotia Litigation settlement received Bankruptcy Court approval, as expected, yesterday. The holders of the Units, as a consequence, are entitled to a significant (as much as \$14/Unit) near-term distribution.

The magnitude and timing of subsequent distributions is not as clear, but we believe that in the most likely scenario for the Term Loan Avoidance Litigation (the most significant remaining claim against MTLQU), all claims against the GUC Trust could be resolved, and all distributions to the holders of the Units made, by 3/31/15. In this most-likely scenario, the Units could generate an un-correlated annualized total return of 18%.

We believe that the Units present an attractive relative value at current levels.

Key Data

Rating	Not Rated ("NR")
Price Target	None
Price (10/21/2013 Close)	\$34.35
52 Week High-Low	\$37.00 - \$18.51
Market Cap (\$ mm)	\$1,032
Shares Out (mm)	30.0
90-day Average Daily Vol	133,318
Public Market Float	100%

Motors Liquidation Company (MTLQU, NA, PT:NA)

Model Summary

We have estimated the cost of liquidating the GUC Trust based on historical costs and input from certain of the GUC Trust’s advisors. It is worth noting that the GUC Trust transferred \$13.7 million to the Avoidance Action Trust in the 2Q12, which should be, in our view, enough to fund the Term Loan Avoidance Litigation through its conclusion. Our estimate of the GUC Trust’s tax liability is based on the current market prices of the GM Securities and a 39.6% effective tax rate. Please see a summary of our cost of liquidation forecasts on Page 5.

Valuation Methodology

The total return of a long position in the Units will be influenced by: (1) the performance of the GM Securities (the primary assets of the GUC Trust), (2) the amount of general unsecured claims that are ultimately allowed by the GUC Trust, (3) the cost of the liquidation, and (4) timing of the distributions of GM Securities from the GUC Trust.

Valuation Summary

Residual (\$ millions)	\$1,254.6
GUC Trust Unit (millions)	31.897
GUC Trust Unit Value	\$39.33

(\$ millions):

Net Assets in Liquidation	\$1,741.2
Initial Distributions	-486.6
Residual	\$1,254.6

<u>GM Securities - Market Values:</u>	GM Securities		
	Market Value	Initial Distribution / Unit	Initial Distribution (\$ millions)
GM Common	\$35.50	3.97	\$141.0
GM Series A Warrants	\$25.97	3.61	93.8
GM Series B Warrants	\$18.47	3.61	<u>66.7</u>
			\$301.4

GUC Trust Units Issued subsequent to 6/30/13 (millions)	-	-	1.614
Initial Distributions	-	-	\$486.6

Source: Company reports and CRT estimates



Rating Rationale

We do not have a rating on the MTLQU units.

Risk Summary

The primary risks to our estimate of the value of the Units include: (1) higher than expected Allowed GUCs, (2) a lower than expected GM Common Share and Warrant prices, (3) a slower than expected pace of distributions, (4) higher than expected administrative costs.

Valuation

We are revising our valuation of the Units from \$36/unit to \$39/unit to reflect downward revisions to our estimates for both claims (now \$31.897 billion) and the expected costs of the liquidation (now \$27.5 million). Our valuation is 15% above yesterday's closing price \$34.35/Unit.

We believe that the total return of the Units will likely be bolstered by a significant distribution (we estimate as much as \$14/Unit) in the 4Q13. While the timing of the distributions beyond the 4Q13 is less clear, we believe that the resolution of the remaining claims against the GUC Trust, and in turn, the final distributions of the GM Securities, could occur as early as 3/31/15. In this scenario, **we estimate that the Units could generate an un-correlated annualized total return of 18%.**

The total return of a long position in the Units will be influenced by:

1. the performance of the GM Securities (the primary assets of the GUC Trust),
2. the amount of general unsecured claims that are ultimately allowed by the GUC Trust,
3. the cost of the liquidation, and
4. timing of the distributions of GM Securities from the GUC Trust.

1. GM Securities

Investors looking to gain exposure to GM will be better served, in our view, owning the GM Securities themselves, rather than the GUC Trust Units. The GM Securities are more liquid than the GUC Units. In fact, we recommend investors short GM Common Shares against the Units in order to isolate the cost and timing of liquidating the estate.

2. Claims

The GUC Trust had allowed, as of 6/30/13, \$30.283 billion of general unsecured claims. We estimate that the GUC Trust will ultimately allow approximately \$31.897 billion general unsecured claims.

As of 6/30/13:			
	Actual	Adj	GUC Trust Termination
<u>General unsecured claims ("GUCs")(\$ millions):</u>			
Allowed as of 6/30/13	\$30,283	\$0	\$30,283
Allowed subsequent to 6/30/13	0	1,614	1,614
Disputed as of 6/30/13	4,904	-4,904	0
Total	\$35,187	-\$3,290	\$31,897
<u>GUC Trust Units (millions):</u>			
Issued and Issuable at 3/31/13	30.227		
Newly issued units	0.055		
Issued and Issuable at 6/30/13	30.283	1.614	31.897

As of 6/30/13:			
	Actual	Adj	GUC Trust Termination
<u>Allowed subsequent to 6/30/13:</u>			
Nova Scotia	3,058	-1,508	1,550
Other	346	-282	64
Subtotal	\$3,404	-\$1,790	\$1,614
Term Loan Avoidance	1,500	-1,500	0
Total	\$4,904	-\$3,290	\$1,614
<u>Allowance rate:</u>			
Nova Scotia	51%		
Other	19%		
Subtotal	47%		
Term Loan Avoidance	0%		
Total	33%		

Source: Company reports and CRT estimates

Motors Liquidation Company (MTLQU, NA, PT:NA)

Historical Claims Performance

The GUC Trust has, in our view, been very effective in resolving general unsecured secured claims against the estate. Since the Effective Date, the GUC Trust has allowed, excluding the Nova Scotia Litigation, only \$522 million (or 11%) of the \$4.825 billion of general unsecured claims that have been addressed.

	As of:			Allowance Rate
	Effective Date	6/30/13(a)	Change	
<u>Allowed:</u>				
Nova Scotia Litigation	\$0	\$1,550	\$1,550	51%
Term Loan Avoidance Litigation	0	0	0	-
Other	<u>29,771</u>	<u>30,293</u>	<u>522</u>	<u>11%</u>
Subtotal	\$29,771	\$31,843	\$2,072	68%
<u>Disputed:</u>				
Nova Scotia Litigation	\$3,058	\$0	-\$3,058	-
Term Loan Avoidance Litigation	1,500	1,500	0	-
Other	<u>5,096</u>	<u>271</u>	<u>-4,825</u>	-
Subtotal	\$9,654	\$1,771	-\$3,058	-
Total	\$39,425	\$33,614	-\$986	-

(a) Pro forma to reflect the Nova Scotia and NUMMI Settlements.

Source: Company reports and CRT estimates

The Nova Scotia Litigation Settlement Agreement

On 9/27/13, the GUC Trust announced that it had entered into a proposed settlement agreement (the "Settlement Agreement") regarding the general unsecured claims asserted by, or on behalf of, the holders of the 8.375% Guaranteed Notes due 12/7/15 (the "8.375s") and the 8.875% Guaranteed Notes due 7/10/23 (the "8.875s"), in each case issued by General Motors Nova Scotia Finance Company (collectively, the "Nova Scotia Notes"). The Settlement Agreement is subject to bankruptcy court approval.

Pursuant to the Settlement Agreement, the holders of the Nova Scotia Notes will receive: (1) general unsecured claims equal to \$1.55 billion (out of the \$3.058 billion previously asserted) and (2) a \$37.5 million payment as reimbursement of fees and expenses.

The Settlement Agreement requires that the GUC Trust make special distributions to: (1) the holders of the Nova Scotia Notes, consisting of: (a) 6,174,015 shares of GM Common Stock, (b) 5,612,741 GM Class A Warrants, (c) 5,612,741 GM Class B Warrants, and (d) 1,550,000 GUC Trust Units and (2) holders of GUC Trust Units consisting of excess distributable assets. We estimate that the 8.375s and 8.875s will recover, excluding the fee reimbursement, 53% and 55% of par. Please see our Company Note dated 9/30/13.

	Common	Warrants		GUC Trust		
	Shares	A	B	Units	Total	Settlement Allocation
Initial Distribution	6.17	5.61	5.61	1.55		
Price / Unit	\$35.50	\$25.97	\$18.47	\$34.35		
Market Value						
(millions)	Common Shares	Warrants A	Warrants B	GUC Trust Units	Total	Settlement Allocation
8.375% guaranteed notes due 12/7/15	\$125.9	\$83.7	\$59.5	\$30.6	\$299.7	57.4%
8.875% guaranteed notes due 7/10/23	<u>93.3</u>	<u>62.1</u>	<u>44.1</u>	<u>22.7</u>	<u>222.1</u>	<u>42.6%</u>
Total	\$219.2	\$145.8	\$103.7	\$53.2	\$521.8	100.0%
Face Amount						
(millions)	GBP	USD / GBP	USD	% of Par		
8.375% guaranteed notes due 12/7/15	350	1.6146	565.11	53.0%		
8.875% guaranteed notes due 7/10/23	250	1.6146	403.65	55.0%		
Total						

Source: Company reports and CRT estimates

The Bankruptcy Court approved the Settlement Agreement on 10/21/13.

Motors Liquidation Company (MTLQU, NA, PT:NA)

Term Loan Avoidance Litigation

If the Nova Scotia Settlement is approved by the Bankruptcy Court, the Term Loan Avoidance Litigation (the “Term Loan Avoidance Litigation”) is by far the largest single remaining disputed claim against the GUC Trust. Judge Gerber ruled in favor of JP Morgan’s motion for summary judgment, and concurrently rejected the Committee of General Unsecured Creditors’ (the “Committee”) motion for partial summary judgment, on 3/1/13. In issuing his ruling, the Judge delineated two core principals in making his determination: (1) an agent must be authorized by the secured lender to terminate an initial financing statement and (2) the principal intended for the agent to terminate the initial financing statement.

The Committee filed an appeal with the Second Circuit Court (the “Circuit Court”) on 3/7/13.

We do not assume any general unsecured claims against the GUC Trust will be allowed as a result of the Term Loan Avoidance Litigation. We believe that either: (1) the Second Circuit Court will uphold the Bankruptcy Court’s decision or (2) the Bankruptcy Court will rule that the Term Loan was fully-secured and entitled to repayment.

Other

In addition to the Nova Scotia Litigation and the Term Loan Litigation, the GUC Trust had, at 6/30/13, approximately \$350 million of disputed claims. We believe that at least \$75 million of disputed claims were resolved in the 3Q13 and that the rest can be resolved as early as 3/31/15. We have assumed that 20% of the remaining disputed claims (outside of the Term Loan Avoidance Litigation) are ultimately allowed. Please see Appendix 1.

3. Liquidation Cost

We estimate the liquidation costs in two scenarios, which are largely dependent on the ruling of the Second Circuit Court with respect to the Committee’s appeal of the Term Loan Avoidance Litigation.

In Scenario 1 (Base Case), the Second Circuit Court rules against the Committee’s appeal, which in our view, would lead to the disallowance of the entire \$1.5 billion claim that is outstanding against the GUC Trust and a resolution of the GUC Trust by 3/31/15.

	Scenario 1:			
	Fiscal year end:			
	<u>3/31/13</u>	<u>3/31/14E</u>	<u>3/31/15E</u>	<u>3/31/16E</u>
Professional Fees	\$18.110	\$14.235	\$5.900	\$0.000
Other	<u>6.274</u>	<u>5.953</u>	<u>5.860</u>	<u>0.000</u>
Total	\$24.385	\$20.188	\$11.760	\$0.000
Cumulative	-	\$15.695	\$27.455	\$27.455

In Scenario 2, the Second Circuit Court rules in favor of the Committee’s appeal, and the Nova Scotia Litigation is sent back to the Bankruptcy Court to determine the extent to which, if at all, the Term Loan was under-secured at the time that it was repaid. We continue to

	Scenario 2:			
	Fiscal year end:			
	<u>3/31/13</u>	<u>3/31/14E</u>	<u>3/31/15E</u>	<u>3/31/16E</u>
Professional Fees	\$18.110	\$14.235	\$5.900	\$2.150
Other	<u>6.274</u>	<u>5.953</u>	<u>5.860</u>	<u>3.720</u>
Total	\$24.385	\$20.188	\$11.760	\$5.870
Cumulative	-	\$15.695	\$27.455	\$33.325

Source: Company reports and CRT estimates

believe that the value of the surviving collateral may have been enough to fully-secure the Term Loan, and believe that the entire \$1.5 billion claim will be disallowed. In Scenario 2, we believe that the additional litigation could delay the resolution of the GUC Trust until 3/31/16.

Motors Liquidation Company (MTLQU, NA, PT:NA)

4. Distributions

We believe that the holders of the Nova Scotia Bonds and the Units will likely receive significant distributions of GM Securities in 11/13 and 12/13, respectively.

	Market Value of GM Securities	GM Securities / Unit	Market Value of GM Securities / Unit
<u>GM Securities - Market Values:</u>			
GM Common	\$35.50	3.97	\$141.0
GM Series A Warrants	\$25.97	3.61	93.8
GM Series B Warrants	\$18.47	3.61	<u>66.7</u>
			\$301.4
Potential Units Disallowed	-	-	1.573
Value of Potential Units Disallowed	-	-	\$474.2
Potential Units Remaining			33.614
Value of Potential Units Disallowed / Potential Units Remaining			\$14.11

Source: Company reports and CRT estimates

We estimate that the distribution to the holders of the GUC Trust Units (the "4Q13 Distribution"), absent an upward revision to the GUC Trust's reserves for future tax liabilities (the "Tax Reserve") and the costs of the liquidation (the "Liquidation Cost Reserve")(together, the "Reserves"), will be approximately \$14/Unit. We believe that the GUC Trust is already conservatively reserved, however, we cannot rule out a scenario where the GUC Trust increases its reserves.

The resolution of the Term Loan Avoidance Litigation will be the biggest determinate of the timing and size of subsequent distributions from the GUC Trust. The Committee and JPM are scheduled to file briefs by 12/9/13 and 12/23/13, respectively. From there, the time-line is not entirely clear. It seems reasonable to expect that the Circuit Court would be able to hear oral arguments in the 1Q14 and rule within six to twelve months thereafter.

If the Second Circuit Court rules against the Committee's appeal, the only legal option that we see for the Committee would be an appeal to the U.S. Supreme Court. It seems unlikely that the U.S. Supreme Court would accept an appeal of the Term Loan Avoidance Litigation given that there are no constitutional issues or conflicting court opinions involved. If the Committee loses its appeal, it seems likely that the GUC Trust would be able to disallow the entire \$1.5 billion disputed claim. In this scenario, we believe that the remaining claims against the GUC Trust can be resolved by 3/31/15.

If the Second Circuit Court rules in favor of the Committee's appeal, the Nova Scotia Litigation would be sent back to the Bankruptcy Court to determine the extent to which, if at all, the Term Loan was under-secured at the time that it was repaid. We continue to believe that the value of the surviving collateral may have been enough to fully-secure the Term Loan. In this scenario, we believe that the remaining claims against the GUC Trust can be resolved by 3/31/16. Please see Appendix 2.

Moters Liquidation Company (MTLQU, NA, PT:NA)

Appendix 1

Claims Estimates

Category:	Allowed:				
	As of		As of		As of
	<u>6/30/13</u>	<u>Adj.</u>	<u>6/30/13(a)</u>	<u>Adj.</u>	<u>GUC Trust Termination</u>
Accounts payable and Executory Contracts:	\$847	\$0	\$847	-	-
Asbestos	625	0	625	-	-
Debt	27,267	1,550	28,817	-	-
Employee	1,004	0	1,004	-	-
Environmental	240	0	240	-	-
Litigation	296	10	306	-	-
Workers Compensation	4	0	4	-	-
Other	<u>0</u>	<u>0</u>	<u>0</u>	-	-
Total	\$30,283	\$1,560	\$31,843	\$54	\$31,897
Term Loan Avoidance Litigation	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	\$30,283	\$1,560	\$31,843	\$54	\$31,897
Category:	Disputed:				
	As of		As of		As of
	<u>6/30/13</u>	<u>Adj.</u>	<u>6/30/13(a)</u>	<u>Adj.</u>	<u>GUC Trust Termination</u>
Accounts payable and Executory Contracts:	\$77	\$0	\$77	-	-
Asbestos	0	0	0	-	-
Debt	3,058	-3,058	0	-	-
Employee	0	0	0	-	-
Environmental	0	0	0	-	-
Litigation	100	-75	25	-	-
Workers Compensation	0	0	0	-	-
Other	<u>168</u>	<u>0</u>	<u>168</u>	-	-
Total	\$3,404	-\$3,133	\$271	-\$271	\$0
Term Loan Avoidance Litigation	<u>1,500</u>	<u>0</u>	<u>1,500</u>	<u>-1,500</u>	<u>0</u>
Total	\$4,904	-\$3,133	\$1,771	-\$1,771	\$0
Category:	Total:				
	As of		As of		As of
	<u>6/30/13</u>	<u>Adj.</u>	<u>6/30/13(a)</u>	<u>Adj.</u>	<u>GUC Trust Termination</u>
Accounts payable and Executory Contracts:	\$924	\$0	\$924	-	-
Asbestos	625	0	625	-	-
Debt	30,325	-1,508	28,817	-	-
Employee	1,004	0	1,004	-	-
Environmental	240	0	240	-	-
Litigation	396	-65	331	-	-
Workers Compensation	4	0	4	-	-
Other	<u>169</u>	<u>0</u>	<u>169</u>	-	-
Total	\$33,687	-\$1,573	\$32,114	-217	31,897
Term Loan Avoidance Litigation	<u>1,500</u>	<u>0</u>	<u>1,500</u>	<u>-1,500</u>	<u>0</u>
Total	\$35,187	-\$1,573	\$33,614	-1,717	31,897

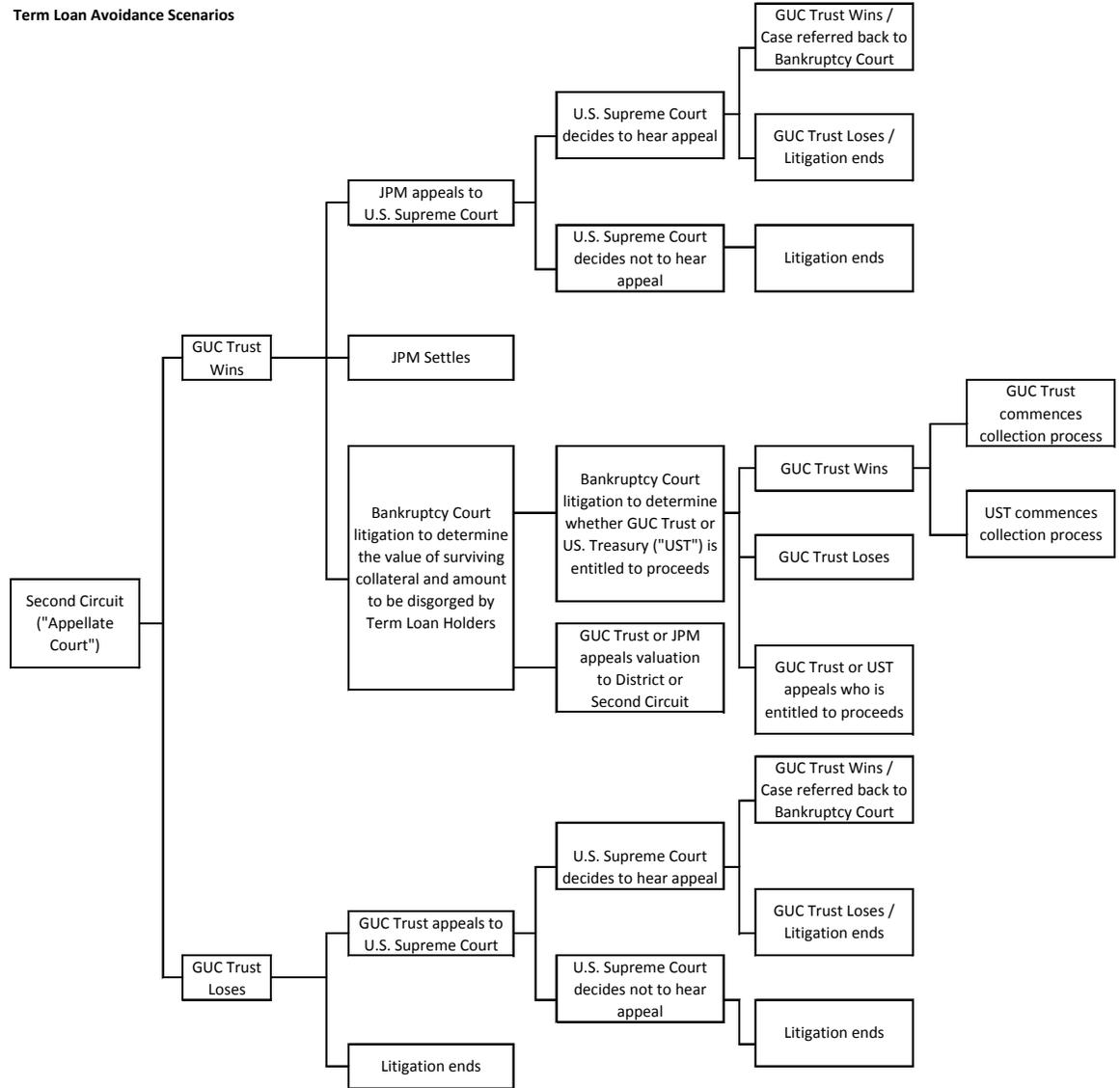
(a) Pro forma to reflect the Nova Scotia and NUMMI Settlements.

Source: Company reports and CRT estimates

Motors Liquidation Company (MTLQU, NA, PT:NA)

Appendix 2

Term Loan Avoidance Scenarios



Source: CRT

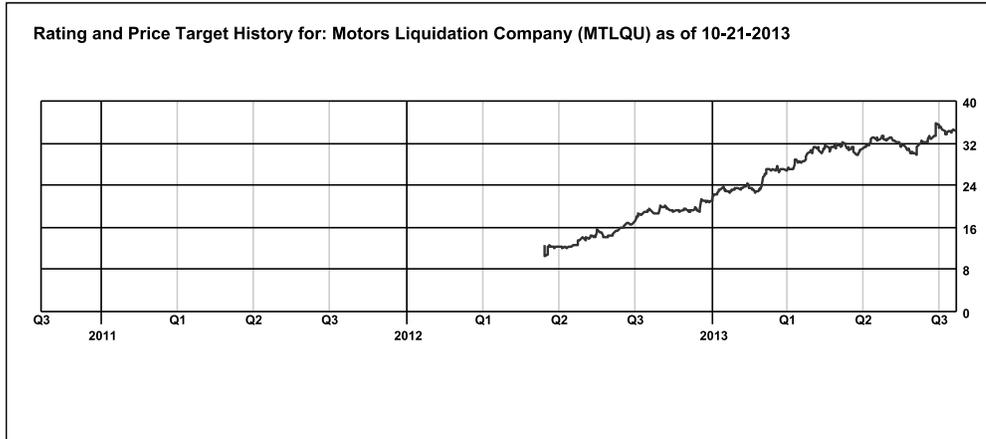
Motors Liquidation Company (MTLQU, NA, PT:NA)

REQUIRED DISCLOSURES

The recommendations and guidance expressed in this research report accurately reflect the personal recommendations and guidance of the research analyst principally responsible for the preparation of this report

No part of the compensation received by the analyst principally responsible for the preparation of this report was, is or will be directly or indirectly related to the specific recommendations and guidance expressed in this report. Direct or indirect analyst compensation may be based on performance-related considerations associated with the recommendations and guidance expressed by the analyst in this report

The research analyst primarily responsible for the preparation of this report received compensation that is based upon CRT Capital Group LLC's total business revenues, including revenues derived from CRT's investment banking business



Rating	Meaning
Buy	Expected rate of return on investment at current prices levels is above that rate required, in CRT's view to undertake the attendant risks perceived- positive risk/reward investment balance.
Fair Value	Expected rate of return on investment at current prices levels is in line with that rate required, in CRT's view to undertake the attendant risks perceived- equitable/reward investment balance.
Sell	Expected rate of return on investment at current prices levels is below that rate required, in CRT's view to undertake the attendant risks perceived- negative risk/reward investment balance.

As of the time of this publication, CRT Capital Group LLC makes a market in the securities of Motors Liquidation Company.

CRT Equity Securities Ratings Percentages As of October 22, 2013	Percentage of Banking Clients Within Each Rating Category As of October 22, 2013
Buy 49.48%	14.58%
Fair Value 48.45%	0.00%
Sell 2.06%	0.00%

Valuations are based on estimates using traditional industry methods including, inter alia, analysis of earnings multiples, discounted cash flow calculations and net asset value assessments. Price targets should be considered in the context of all prior CRT research published in connection with the subject issuer, which may or may not have included price targets, as well as developments relating to the company, its industry and financial markets. Risks that may impede achievement of the stated price target, if any, include, but are not limited to, broad market and macroeconomic fluctuations and unforeseen changes in the subject company's fundamentals or business trends.

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EXHIBIT B

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MOTORS LIQUIDATION COMPANY (MTLQU, NR, PT: NONE, CLOSE: \$42.50)

Raising Valuation of GUC Trust Units - CORRECTED

November 11, 2013

We now believe that the GUC Trust will have enough tax benefits to shelter 100% of the gains implied by the 11/8/13 trading levels, and we are raising our valuation of the GUC Trust Units from “high 40s” to \$51/Unit.

Given that there remains some uncertainty regarding the value of the GUC Trust Units, as well as the timing of the distributions of the GUC Trust’s assets, we believe that the holders of the GUC Trust Units are entitled to a total, scenario-weighted, annualized return of approximately 10%. With this rate of return in mind, we believe that the GUC Trust Units are “Fairly Valued” at \$46.00/Unit.

Motors Liquidation Company GUC Trust (“MTLQU” or the “GUC Trust”) released its 10-Q for the quarter ended 9/30/13 on 11/7/13 after the close. On 11/8/13, the price of the GUC Trust Units rallied 19.7% to close at \$42.50/Unit. The GUC Trust disclosed, in its 10-Q, a number of positive developments, including, that:

1. more likely than not, the IRS will determine that the tax basis of the assets in the GUC Trust are materially higher than the GUC Trust had previously represented,
2. it has revised the methodology for determining the holdback for potential tax liabilities such that fewer GM Securities will be withheld,
3. the GUC Trust, during the 3Q13, resolved \$212.8 million Disputed General Unsecured Claims, of which, only \$10.6 million became Allowed General Unsecured Claims, and
4. the costs of winding down the estate are likely to be less than previously expected.

Of these developments, we believe that the date that the GM Securities were transferred to the GUC Trust could have significant implications for the ultimate value of the GUC Trust Units. In addition, the revision to the methodology of the tax liability holdback has increased our confidence that holders of the GUC Trust Units are likely to receive at least \$14/Unit by year-end 2013.

On 11/8/13, we published a Company Note in which we estimated that the proposed change in the date of transfer, if accepted by the IRS, implies a value of the GUC Trust Units, based on the current trading level of the GM Securities, in the high \$40s/Unit. Given that the proposed treatment is subject to IRS approval, we believe that the GUC Trust Units are fairly valued in the mid-40s”.

Our “high 40s/Unit” valuation was based on the GUC Trust paying taxes on the gains resulting from the appreciation in the GM Securities between 3/31/11 and the market prices on 11/8/13.

Key Investment Risks

The primary risks to our estimate of the value of the Units include: (1) higher than expected Allowed GUCs, (2) a lower than expected GM Common Share and Warrant prices, (3) a slower than expected pace of distributions, (4) higher than expected administrative costs.

Valuation Methodology

The total return of a long position in the Units will be influenced by: (1) the performance of the GM Securities (the primary assets of the GUC Trust), (2) the amount of general unsecured claims that are ultimately allowed by the GUC Trust, (3) the cost of the liquidation, and (4) timing of the distributions of GM Securities from the GUC Trust.

Motors Liquidation Company (MTLQU, NA, PT:NA)

Tax Basis

We believe that the date that the GM Securities were transferred to the GUC Trust could have significant implications for the value of the GUC Trust Units.

In its 10-Q, the GUC Trust indicated that it has made a determination, and more likely than not, the IRS will agree, that the beneficial ownership of the assets (primarily the GM Securities) was transferred from Motors Liquidation Corporation (“MLC”) to the GUC Trust on 3/31/11 rather than 12/15/11,

“The GUC Trust believes, based on the available evidence and consultation with GUC Trust professionals as of September 30, 2013, that it is more likely than not that the new tax position in the amounts to be reflected in the GUC Trust’s income tax returns, will be sustained on examination by the Internal Revenue Service based on the technical merits of the position. Accordingly, the net deferred tax liability at September 30, 2013, in the accompanying financial statements has been reduced by \$411.6 million (compared to the balance that would have been recorded at September 30, 2013, if the tax basis were determined on the date of transfer of record ownership on December 15, 2011, for all New GM Securities) and a corresponding tax benefit related to the new tax position has been recognized in the GUC Trust’s financial statements for the respective three and six month periods ended September 30, 2013.”

The tax basis of the GM Securities is based on their trading level on the date that the IRS determines that the securities were transferred to the GUC Trust. Given that the trading level of the GM Securities was materially higher on 3/31/11 than on 12/15/11, a change in the date that the shares were transferred, for tax purposes, from 12/15/11 to 3/31/11, would materially:

- (1) increase the tax basis in the GM Securities in the GUC Trust,
- (2) reduce the potential tax liability upon the distribution of the GM Securities to the holders of the GUC Trust Units, and
- (3) increase the value of the GUC Trust Units.

A calculation of the GUC Trust’s tax liability under a scenario where the cost basis is set on 12/15/11 and 3/31/11 is shown in the table below:

	Market price as of:		Change
	12/15/11	11/8/13	
Scenario 1: Cost Basis Set at 12/15/11 Market Prices:			
New GM Common Stock	\$19.87	\$36.66	\$16.79
New GM Series A Warrants	\$11.38	\$27.07	\$15.69
New GM Series B Warrants	\$7.88	\$19.27	\$11.39
Gain (Loss):			
New GM Common Stock	\$565.82	\$1,043.94	\$478.1
New GM Series A Warrants	294.60	700.77	406.17
New GM Series B Warrants	<u>203.99</u>	<u>498.85</u>	<u>294.86</u>
Subtotal	\$1,064.41	\$2,243.56	\$1,179.1
Net operating losses through 6/30/13			47.8
Additional expected tax deductible costs of liquidation			<u>47.6</u>
Net			\$1,083.8
Deferred Tax Liability			\$429.2
Effective Tax Rate			39.6%

Source: Company documents and CRT estimates

Motors Liquidation Company (MTLQU, NA, PT:NA)

Scenario 2: Cost Basis Set at 3/31/11 Market Prices:

	Market price as of:		
	<u>3/31/11</u>	<u>11/8/13</u>	<u>Change</u>
New GM Common Stock	\$31.03	\$36.66	\$5.63
New GM Series A Warrants	\$22.67	\$27.07	\$4.40
New GM Series B Warrants	\$17.24	\$19.27	\$2.03
<u>Gain (Loss):</u>			
New GM Common Stock	\$883.62	\$1,043.94	\$160.3
New GM Series A Warrants	586.88	700.77	113.89
New GM Series B Warrants	<u>446.18</u>	<u>498.85</u>	<u>52.67</u>
Subtotal	\$1,916.68	\$2,243.56	\$326.9
Net operating losses through 6/30/13			47.8
Additional expected tax deductible costs of liquidation			<u>47.6</u>
Net			\$231.5
Deferred Tax Liability			\$91.7
Effective Tax Rate			39.6%

	As of 9/30/13:		
	Units (millions):		
	Stock	Warrants:	
Series A		Series B	
Distributable Assets as of the Effective Date	150.000	136.364	136.364
Prior Distributions	-120.352	-109.411	-109.411
Prior Sales	<u>-1.172</u>	<u>-1.065</u>	<u>-1.065</u>
Holdings of New GM Securities	28.476	25.887	25.887
Distributions Payable	-1.306	-1.187	-1.187
Distributions Payable to Unit Holders	0.993	0.903	0.903
Set Aside to Fund GUC Trust Costs	-0.881	-0.801	-0.801
Set Aside to Fund GUC Trust Tax Liabilities	<u>-7.448</u>	<u>-6.771</u>	<u>-6.771</u>
Total	-8.643	-7.857	-7.857
Distributable Assets	19.834	18.031	18.031

Source: Company documents and CRT estimates

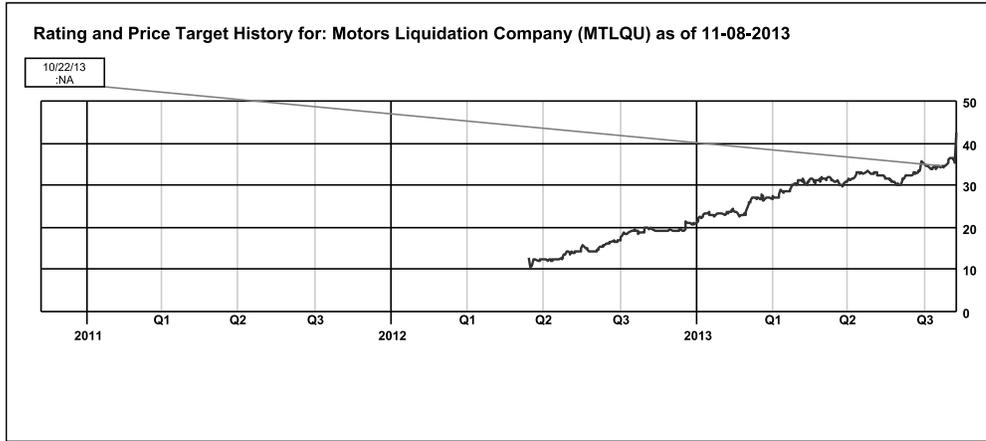
Motors Liquidation Company (MTLQU, NA, PT:NA)

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The research analyst primarily responsible for the preparation of this report received compensation that is based upon CRT Capital Group LLC's total business revenues, including revenues derived from CRT's investment banking business



Rating	Meaning
Buy	Expected rate of return on investment at current prices levels is above that rate required, in CRT's view, to undertake the attendant risks perceived- positive risk/reward investment balance.
Fair Value	Expected rate of return on investment at current prices levels is in line with that rate required, in CRT's view, to undertake the attendant risks perceived- equitable/reward investment balance.
Sell	Expected rate of return on investment at current prices levels is below that rate required, in CRT's view, to undertake the attendant risks perceived- negative risk/reward investment balance.

As of the time of this publication, CRT Capital Group LLC makes a market in the securities of Motors Liquidation Company.

CRT Equity Securities Ratings Percentages As of November 11, 2013	Percentage of Banking Clients Within Each Rating Category As of November 11, 2013
Buy 46.23%	14.29%
Fair Value 51.89%	0.00%
Sell 1.89%	0.00%

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EXHIBIT C



RECEIVED

By Recall Management division at 9:39 am, Feb 25, 2014

February 24, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-047

Dear Ms. Lewis:

This letter supersedes General Motors' letter of February 7, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety-related recall for 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(5) and 573.6(c)(6) below supersedes information included in General Motors' letter of February 7, 2014.

573.6(c)(1): General Motors Company; Chevrolet and Pontiac Brands.

573.6(c)(2),(3),(4): This information is shown on Attachment A.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles. The ignition switch torque performance may not meet General Motors' specification. If the torque performance is not to specification, the ignition switch may unintentionally move from the "run" position to the "accessory" or "off" position with a corresponding reduction or loss of power. This risk may be increased if the key ring is carrying added weight or the vehicle goes off road or experiences some other jarring event. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Until the recall repairs have been performed, it is very important that customers remove all items from their key rings, leaving only the vehicle key. The key fob (if applicable), should also be removed from the key ring.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the attached chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety. See Attachment B. This chronology refers to numerous engineering



inquiries, known within General Motors as Problem Resolution Tracking System ("PRTS") inquiries. As stated in the enclosed document, General Motors is prepared to share with NHTSA upon request the PRTS reports referenced therein, as well as other documentation related to this recall.

573.6(c)(8): Dealers are to replace the ignition switch.

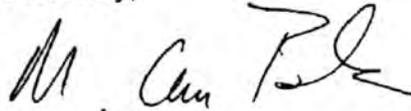
GM will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11(e), GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): GM will provide copies of the dealer bulletin and owner letter under separate cover.

573.6(c)(11): GM's assigned recall number is 13454.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with the first name "M." and last name "Benavides" clearly distinguishable.

M. Carmen Benavides, Director
Product Investigations and Safety Regulations

13454
Attachments

Attachment A - 573.6(c)(2),(3),(4)

**VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE**

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	A	2005	140,978	08/03/2004	06/17/2005	Cobalt	*
Chevrolet	A	2006	229,578	04/05/2005	06/09/2006	Cobalt	"
Chevrolet	A	2007	215,667	04/20/2006	08/16/2007	Cobalt	"
Pontiac	A	2007	32,899	04/20/2006	08/06/2007	G5	"
GM Total:			619,122				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Delphi Packard Electrical/Electronic Architecture
 5725 Delphi Drive
 M/C 483.400.301
 Troy, Michigan 48098

Tel: [1] 248.813.2334
 Fax: [1] 248.813.2333

The involved parts are manufactured in Mexico.

ATTACHMENT B - 573.6(c)(6)

2004. Around the time of the launch of the 2005 Chevrolet Cobalt, GM learned of at least one incident in which a Cobalt lost engine power because the key moved out of the “run” position when the driver inadvertently contacted the key or steering column. GM employees were able to replicate this phenomenon during test drives. An engineering inquiry, known within GM as a Problem Resolution Tracking System inquiry (hereinafter “PRTS”), was opened to investigate the issue.¹ Engineers believed that low key cylinder torque effort was an issue and considered a number of potential solutions. After consideration of the lead time required, cost, and effectiveness of each of these solutions, the PRTS was closed with no action.

2005. GM employees received new field reports of Cobalts losing engine power, including instances in which the key moved out of the “run” position when a driver inadvertently contacted the key or steering column. Further PRTS’s were opened to re-assess this issue. During the course of a PRTS opened in May 2005, an engineer proposed that GM redesign the key head from a “slotted” to a “hole” configuration. That proposal was initially approved, but later cancelled. The PRTS process led to GM’s issuing an Information Service Bulletin 05-02-35-007 in December 2005. This Service Bulletin provided “Information on Inadvertent Turning of Key Cylinder, Loss of Electrical System and No DTCs,” and applied to 2005-06 Chevrolet Cobalts, 2006 Chevrolet HHRs, 2005-06 Pontiac Pursuits (Canada only), 2006 Pontiac Solstices, and 2003-06 Saturn Ions. These vehicles were all equipped with the same ignition switch. The Service Bulletin informed dealers that: “there is potential for the driver to inadvertently turn off the ignition due to low ignition key cylinder torque/effort”; “[t]he concern is more likely to occur if the driver is short and has a large and/or heavy key chain”; and “the customer should be advised of this potential and should take steps to prevent it—such as removing unessential items from their key chain.” In addition, the Service Bulletin advised that “Engineering has come up with an insert for the key ring so that it goes from a ‘slot’ design to a hole design. As a result, the key ring cannot move up and down in the slot any longer—it can only rotate on the hole.” The Service Bulletin further stated that, “[i]n addition, the previous key ring has been replaced with a smaller, 13 mm design. This will result in the keys not hanging as low as in the past.”

Certain of the reported incidents that pre-dated GM’s issuance of Service Bulletin 05-02-35-007 and GM’s public response to inquiries about those incidents were chronicled in newspaper articles that appeared in the *NEW YORK TIMES*, the *CLEVELAND PLAIN DEALER*, and *THE DAILY ITEM* (Sunbury, PA). GM concluded in December 2005 that the Service Bulletin and field service campaign was the appropriate response to the reported incidents, given that the car’s steering and braking systems remained operational even after a loss of engine power, and the car’s engine could be restarted by shifting the car into either neutral or park.

GM updated the Service Bulletin in October 2006 to include additional vehicles and model years—specifically, the 2007 Chevrolet Cobalt, the 2007 Chevrolet HHR, the 2007 Pontiac G5, the 2007

¹ GM is prepared to share with NHTSA upon request the PRTS reports referenced in this document.

Pontiac Solstice, the 2007 Saturn Ion, and the 2007 Saturn Sky.² GM's warranty records indicate that GM dealers have provided key inserts to 474 customers who brought their vehicles into dealers for service.

2006. On April 26, 2006, the GM design engineer responsible for the Cobalt's ignition switch signed a document approving changes to the ignition switch proposed by the supplier, Delphi Mechatronics. The approved changes included, among other things, the use of a new detent plunger and spring that increased torque force in the ignition switch. This change to the ignition switch was not reflected in a corresponding change in the part number for the ignition switch. GM believes that the supplier began providing the re-designed ignition switch to GM at some point during the 2007 model year.

A PRTS was opened on August 1, 2006, after a customer complained of stalling after the car's ignition switch had been replaced. This PRTS indicated that the condition could not be duplicated after more than 100 miles of driving and the PRTS was canceled on October 2, 2006.

2007. On March 29, 2007, a group of GM employees met with NHTSA representatives in Washington, D.C. to discuss occupant restraint systems. During this meeting, a NHTSA representative informed the GM employees of a fatal crash that occurred on July 29, 2005, in which a 2005 Cobalt was involved in a frontal collision, the airbags did not deploy, and data retrieved from the car's sensing and diagnostic module ("SDM") indicated that the car's power mode status was "accessory" (hereinafter "the July 29, 2005 crash"). While GM Legal Staff opened a file relating to this crash in September 2005, the GM employees meeting with NHTSA on this occasion were not aware of the crash at the time of the meeting. After this meeting, a GM investigating engineer was tasked with tracking crashes in which Cobalts were involved in frontal impacts and the airbags did not deploy, in order to try to identify common characteristics of these crashes. By the end of 2007, GM had notice of ten such incidents. SDM data was available for nine of the ten crashes, and that data showed that the ignition was in the "run" position in five of the crashes and in the "accessory" position in four of the crashes.

2009. In February 2009, another PRTS was opened and resulted in the top of the key being changed from a "slot" design to a "hole" design. According to the PRTS, "[c]ustomers with substantially weighted key chains/additional keys hanging from ignition key have experienced accidental ignition shut-off. Changing from a slot to a hole will significantly reduce downward force and the likelihood of this occurrence." This key design change was implemented in model year 2010 Cobalts.

On or about May 15, 2009, several GM engineers met with representatives of Continental, the supplier of the SDMs used in the Cobalt. In the fourteen frontal-impact crashes for which SDM data was then available, the ignition was recorded in "run" for seven of the crashes and in the "accessory" position for the other seven. Prior to this meeting, GM had provided Continental with

² GM's records contain references to a second update of the Service Bulletin in July 2011, which covered the same models and model years as the first update in October 2006. However, upon investigation, GM believes that the Service Bulletin was not updated in July 2011.

two SDMs from crashes involving a 2005 Cobalt and a 2006 Cobalt in which the airbags had not deployed and the SDM data indicated that the car's ignition switch was in the "run" position at the time of the crash. During this meeting, Continental representatives informed the GM engineers that, according to further stored data inaccessible to GM engineers but retrieved by Continental, the SDM's sensing algorithm had been disabled at the time of the crash, and discussed reasons why this may have happened. Although GM engineers had identified other crashes in which airbags had not deployed and the ignition switch was recorded in the "run" position at the time of the crash, GM engineers were not able to obtain the SDMs from the vehicles involved in these crashes for further interrogation by Continental.

2010. During the summer of 2010, GM discontinued production of the Cobalt at the end of the 2010 model year, as previously planned.

2011. In late July 2011, a meeting was held at GM involving Legal Staff, Field Performance Assessment ("FPA") and Product Investigations personnel who would be involved in the Field Performance Evaluation ("FPE") process. Soon thereafter, in August 2011, a Field Performance Assessment Engineer ("FPAE") was assigned to move forward with an FPE investigation of a group of crashes in which airbags in 2005-2007 model year Chevrolet Cobalts and a 2007 Pontiac G5 had not deployed during frontal impacts.

Then as now, GM's FPE process consisted of several steps, beginning with investigation of the issue, then presentation of potential solutions to decision makers, and culminating in a decision and implementation of that decision. At the outset of the process, investigating engineers work to develop technical understanding of the issue. They then present their findings and proposed solutions to the Field Product Evaluation Recommendation Committee ("FPERC"). The FPERC's recommendations are then presented to the Executive Field Action Decision Committee ("EFADC"), which decides on a course of action. The FPERC and EFADC may request further analysis before making recommendations or decisions as to what, if any, field action is warranted.

GM's initial investigation of these crashes had revealed that the SDM data available from the involved vehicles showed that some of the ignitions were recorded as having been in the "run" position, while others were recorded as having been in either the "accessory" or "off" positions, at the time of the crash. Because many of the crashes known to GM at the time involved violent off-road impacts occurring under widely varying circumstances and because many involved excessive speeds, different theories had been offered as to why the airbags had not deployed in the various incidents. The assigned FPAE was asked to assess whether common issues or concerns might explain some or all of the non-deployment crashes.

2012. Based on the information then available, the investigation sought, among other things, to determine whether there were known engineering reasons that would explain why these reported non-deployment crashes involved 2007 and earlier model year vehicles. In May 2012, the assigned FPAE studied a cross-section of steering columns and ignition switches from Chevrolet Cobalts, Chevrolet HHRs, Pontiac G5s, and Saturn Ions, in model years ranging from 2003 through 2010. The FPAE accessed, inspected, and tested these steering columns and ignition switches for torque performance at a salvage yard. Certain of these ignition switches exhibited torque performance below that specified by GM for the ignition switch. The most prevalent shortfalls in performance

were observed on ignition switches found in 2007 and earlier model year vehicles. The FPE investigation focused on determining the cause of these variations in torque performance by model year. A review of GM's records by those involved in the investigation did not identify design changes to the ignition switch that would explain the variations in torque performance for the 2007 and earlier model year vehicles and that of the 2008 and later model year vehicles. GM also considered other components that might potentially influence the torque performance of the ignition switches, including changes made to the car's theft system at the beginning of the 2008 model year. Again, no explanation was discovered. GM engineers conducted separate studies using the "Red X" and "Design for Six Sigma" problem-solving methodologies, in hopes of better understanding the differences in observed torque performance, but those, too, produced inconclusive results. These latter studies were concluded in November 2012 and January 2013, respectively.

2013. In late April 2013, the FPAE learned that the torque performance of a GM service part ignition switch purchased after 2010 differed substantially from that of an ignition switch that was original equipment installed on a 2005 Cobalt. He also learned that others had observed and documented that the detent plunger and spring used on the service part switch differed from those used on the original equipment switch installed on the 2005 Cobalt. Shortly thereafter, GM retained outside engineering resources to conduct a comprehensive ignition switch survey and assessment. That investigation included torque performance testing, ignition switch teardowns, and x-ray analyses of ignition switches used in production vehicles both before and after the 2007 model year. The data gathered by GM's outside technical expert showed that: the ignition switches that he tested that had been installed in early-model Cobalts did not meet GM's torque specification; changes had been made to the ignition switch's detent plunger and spring several years after the start of production; and those changes most likely explained the variation from GM's specifications for torque performance observed in the original switches installed in 2007 and earlier model year vehicles.

On October 29, 2013, after dialogue with the supplier, GM was provided with supplier records showing that changes had in fact been made to the detent plunger and spring late in the 2006 calendar year. Those changes increased the switch's torque performance. Testing and analysis further determined that whether a key moves from the "run" to "accessory" position and how that key movement affects airbag deployment depends on a number of factors, including: vehicle steering inputs and path of travel immediately before key movement; the weight and load on the key ring immediately before key movement; whether the installed ignition switch meets the torque specifications that GM provided to its supplier; and the timing of the movement of the key out of the "run" position relative to the activation of the airbag's sensing algorithm of the crash event.

Upon completion of this analysis, the issue was presented to the Field Performance Evaluation Review Committee ("FPERC") and the Executive Field Action Decision Committee ("EFADC"). These two committees reviewed the findings in early December, culminating in an EFADC meeting on December 17, 2013. Factual questions were raised at that meeting that required further analysis, the findings of which were presented at a second EFADC meeting on January 31, 2014, on which date the EFADC directed a safety recall.

The dealers are to replace the ignition switch. GM will provide the dealer bulletin and owner letter mail dates when available. Pursuant to 577.11(e), GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed.

Between 2005 and the date of this submission, GM is currently aware of 23 frontal-impact crashes involving 2005 to 2007 Chevrolet Cobalts and 2007 Pontiac G5s in which the recall condition may have caused or contributed to the airbags' non-deployment. During that same timeframe, of these crashes, GM is currently aware of six that resulted in eight fatalities of frontal occupants. GM employees became aware of many of these crashes within a month of the dates on which they occurred. As GM learned of these crashes, employees undertook to investigate the underlying facts and circumstances to determine, among other things, why the airbags had not deployed. With respect to 22 of the 23 frontal-impact crashes referenced above, the data retrieved from the vehicles' SDMs indicated that the ignition switches were in the "run" position in nine of the crashes, in the "accessory" position in twelve of the crashes, and in the "off" position in one of the crashes.³ Throughout this period, GM was involved in claims and lawsuits in which allegations were made regarding the ignition switch issue that is the subject of the recall. These 23 crashes are out of a total U.S. population of 619,122 vehicles subject to the pending recall.

³ In one of the 23 crashes referenced above, SDM information could not be retrieved from the vehicle.

EXHIBIT D



14V-047
(10 pages) Supplemental

March 11, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Recall No. 14V-047

Dear Ms. Lewis:

This letter supersedes General Motors' letter of February 25, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety-related recall for 2006-2007 model year (MY) Chevrolet HHR and Pontiac Solstice, 2003-2007 MY Saturn Ion, and 2007 MY Saturn Sky vehicles.

573.6(c)(1): General Motors Company; Chevrolet, Pontiac and Saturn Brands.

573.6(c)(2),(3),(4): This information is shown on Attachment A.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2006-2007 MY Chevrolet HHR and Pontiac Solstice, 2003-2007 MY Saturn Ion, and 2007 MY Saturn Sky vehicles. The ignition switch torque performance may not meet General Motors' specification. If the torque performance is not to specification, the ignition switch may unintentionally move from the "run" position to the "accessory" or "off" position with a corresponding reduction or loss of power. This risk may be increased if the key ring is carrying added weight or the vehicle goes off road or experiences some other jarring event. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Until the recall repairs have been performed, it is very important that customers remove all items from their key rings, leaving only the vehicle key. The key fob (if applicable), should also be removed from the key ring.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the attached chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety. See Attachment B. This chronology refers to numerous engineering inquiries, known within General Motors as Problem Resolution Tracking System ("PRTS") inquiries. As stated in the enclosed document, General Motors is prepared to share with



NHTSA upon request the PRTS reports referenced therein, as well as other documentation related to this recall.

573.6(c)(8): Dealers are to replace the ignition switch.

GM provided dealers notification of the recall on February 26, 2014 and March 4, 2014. GM will be providing a recall service bulletin to dealers on or about April 7, 2014. In addition, GM mailed the owner letters on March 10 and 11, 2014.

Pursuant to 577.11(e), GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): GM will provide copies of the dealer bulletin under separate cover. GM has previously provided a copy of the owner letter.

573.6(c)(11): GM's assigned recall number is 14063.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with the first name "M." and last name "Benavides" clearly visible.

M. Carmen Benavides, Director
Product Investigations and Safety Regulations

14063
Attachment

Attachment A - 573.6(c)(2),(3),(4)

**VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE**

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	A	2006	113,911	04/11/2005	06/22/2006	HHR	*
Chevrolet	A	2007	99,672	05/15/2006	06/23/2007	HHR	"
Pontiac	M	2006	18,750	03/16/2005	06/23/2006	Solstice	"
Pontiac	M	2007	21,310	06/05/2006	06/15/2007	Solstice	"
Saturn	A	2003	96,358	06/01/2002	07/24/2003	Ion	"
Saturn	A	2004	121,107	04/29/2003	08/07/2004	Ion	"
Saturn	A	2005	71,024	04/27/2004	06/06/2005	Ion	"
Saturn	A	2006	96,227	04/13/2005	05/05/2006	Ion	"
Saturn	A	2007	94,118	04/05/2006	03/28/2007	Ion	"
Saturn	M	2007	15,547	12/06/2005	06/14/2007	Sky	"
GM Total:			748,024				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Delphi Packard Electrical/Electronic Architecture
 5725 Delphi Drive
 M/C 483.400.301
 Troy, Michigan 48098

Tel: [1] 248.813.2334
 Fax: [1] 248.813.2333

The involved parts are manufactured in Mexico.

ATTACHMENT B - 573.6(c)(6)

CHRONOLOGY

**Re: Recall of 2006-2007 Chevrolet HHR and Pontiac Solstice,
2003-2007 Saturn Ion, and 2007 Saturn Sky Vehicles**

On February 7, 2014, General Motors (“GM”) notified the National Highway Transportation Safety Administration (“NHTSA”) of its decision to recall 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles. By letter dated February 24, 2014, GM submitted to NHTSA a chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety, with respect to the recall of the Cobalt and G5 vehicles (“the Cobalt and G5 recall”).

In making this recall determination, GM’s Executive Field Action Decision Committee (“EFADC”) was asked to consider a proposed recall only of the Cobalt and G5 vehicles. The submissions to the EFADC did not propose a recall of the Ion, HHR, Solstice and Sky vehicles. Following GM’s announcement of the Cobalt and G5 recall on February 7, 2014, as will be discussed in more detail below, the decision was made to conduct a more in-depth analysis of information related to the vehicles that were listed on Service Bulletins 05-02-35-007 and 05-02-35-007A, but were not included in the February 7, 2014 recall submission to NHTSA.

By letter dated February 25, 2014, GM notified NHTSA of its decision to recall all of the other vehicles listed in the aforementioned Service Bulletins—specifically, 2003-2007 model year Saturn Ion, 2006-2007 model year Chevrolet HHR and Pontiac Solstice, and 2007 model year Saturn Sky vehicles (“the Ion, HHR, Solstice and Sky recall”). Because these vehicles were equipped with the same ignition switch installed in the 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles, the chronology submitted on February 24, 2014, with respect to the Cobalt and G5 recall is relevant to GM’s decision to issue the Ion, HHR, Solstice and Sky recall. In addition to the events set forth in the chronology submitted to NHTSA regarding the Cobalt and G5 recall, the following describes the principal events that were the basis for the determination, relating to the Ion, HHR, Solstice and Sky recall, that the defect related to motor vehicle safety. GM’s review of data and information relating to the recalled vehicles continues.

* * *

2005. GM employees received field reports of Chevrolet Cobalt vehicles losing engine power, including instances in which the key moved out of the “run” position when a driver inadvertently contacted the key or steering column. Engineering inquiries, known within GM as Problem Resolution Tracking System (“PRTS”) reports, were opened to assess this issue. During the course of a PRTS opened in May 2005, an engineer proposed that GM redesign the key head from a “slotted” to a “hole” configuration. That proposal was initially approved, but later cancelled. The PRTS process led to GM’s issuing Information Service Bulletin 05-02-35-007 in December 2005. This Service Bulletin provided “Information on Inadvertent Turning of Key Cylinder, Loss of Electrical System and No DTCs,” and applied to a number of vehicles, including vehicles subject to the Ion, HHR, Solstice and Sky recall—specifically, 2003-06 Saturn Ion, 2006 Chevrolet HHR,

and 2006 Pontiac Solstice vehicles—all of which were equipped with the same ignition switch as the Cobalt. The Service Bulletin informed dealers that: “there is potential for the driver to inadvertently turn off the ignition due to low ignition key cylinder torque/effort”; “[t]he concern is more likely to occur if the driver is short and has a large and/or heavy key chain”; and “the customer should be advised of this potential and should take steps to prevent it—such as removing unessential items from their key chain.” In addition, the Service Bulletin advised that “Engineering has come up with an insert for the key ring so that it goes from a ‘slot’ design to a hole design. As a result, the key ring cannot move up and down in the slot any longer—it can only rotate on the hole.” The Service Bulletin further stated that, “[i]n addition, the previous key ring has been replaced with a smaller, 13 mm design. This will result in the keys not hanging as low as in the past.”

Certain of the reported incidents that pre-dated GM’s issuance of Service Bulletin 05-02-35-007 and GM’s public response to inquiries about those incidents were chronicled in newspaper articles that appeared in THE NEW YORK TIMES, THE PLAIN DEALER (Cleveland, OH), and THE DAILY ITEM (Sunbury, PA). GM concluded in December 2005 that the Service Bulletin and field service campaign were the appropriate response to the reported incidents, given that the car’s steering and braking systems remained operational even after a loss of engine power, and the car’s engine could be restarted by shifting the car into either neutral or park.

2006. On April 26, 2006, the GM design engineer responsible for the ignition switch installed in all of the vehicles subject to the Cobalt and G5 recall and the Ion, HHR, Solstice and Sky recall signed a document approving changes to the ignition switch proposed by the supplier. This document referred to the “GMX 357” vehicle platform, which was GM’s internal designation for the Saturn Ion. The approved changes included, among other things, the use of a new detent plunger and spring that increased torque force in the ignition switch. This change to the ignition switch was not reflected in a corresponding change in the part number for the ignition switch. GM believes that the supplier began providing the re-designed ignition switch to GM for all of the recalled vehicles at some point during the 2007 model year.

In May 2006, a field evaluation inquiry, known within GM as a Field Performance Report (“FPR”), was opened to address customer complaints that their Saturn Ion vehicles would neither crank nor start. Attached to this FPR was a document bearing the logo of the ignition switch supplier, titled “PROPOSED PCB [printed circuit board] LAYOUT.” Under “[p]roblem description,” the document stated, “[s]witch presents Contact Bounces & contact permanent deformation,” “[c]ustomer rejects switches,” and “[f]unctional Problem when car starts.” The “[p]roposed actions from Product Engineering” included “[c]hange PCB design to remove via holes from contact traces,” “[e]nlarge PCB vias to avoid contactors being in via limits,” and “[d]etent plunger to increase torque force to be within spec.” Under “[c]urrent status for PCB,” the document stated, among other things, “1.-Validation for Torque & Angle for timing corrections ~ DONE,” “2.-GM RDE approve GM3660 ~ DONE,” and “6.-SOP @ Condura for new PCB & Spring/Plunger ~ 6/30/06.” The FPR was closed, citing Technical Service Bulletin 06-02-35-017.

GM updated Service Bulletin 05-02-35-007 in October 2006 to include additional vehicles and model years, including the vehicles subject to the Ion, HHR, Solstice and Sky recall—specifically, the 2007 Saturn Ion, the 2007 Chevrolet HHR, the 2007 Pontiac Solstice, and the 2007 Saturn Sky and the 2007 Pontiac G5. GM's warranty records indicate that GM dealers have provided key inserts to 474 customers who brought their vehicles into dealers for service.

2007. A GM investigating engineer was tasked with tracking crashes in which Cobalts were involved in frontal impacts and the airbags did not deploy, in order to try to identify common characteristics of these crashes. Data from the vehicles' sensing and diagnostic modules ("SDM's") were available for nine of the crashes, and that data showed that the ignition was in the "run" position in five of the crashes and in the "accessory" position in four of the crashes. Such information was not available for Saturn Ion vehicles because they were equipped with an SDM that was not designed to record when the engine was not running.

GM discontinued production of the Ion at the end of the 2007 model year, as previously planned.

2011. In late July 2011, a meeting was held at GM involving Legal Staff, Field Performance Assessment ("FPA") and Product Investigations personnel who would be involved in the Field Performance Evaluation ("FPE") process. Soon thereafter, in August 2011, a Field Performance Assessment Engineer ("FPAE") was assigned to move forward with an FPE investigation of a group of crashes in which airbags in 2005-2007 model year Chevrolet Cobalts and a 2007 Pontiac G5 had not deployed during frontal impacts, which also included a review of information related to the Ion, HHR and Solstice vehicles. This FPE investigation did not identify frontal-impact crashes involving 2004 model year Saturn Ion vehicles that resulted in fatalities in which the recall condition may have caused or contributed to the airbags' non-deployment. These crashes have since been identified and are included below in the number of crashes identified based on the data and information collected and reviewed to date.

During the course of the FPE investigation, the FPAE's analyses included the following: reviewing data relating to complaints of stalling in the Ion for all model years; reviewing data relating to crashes involving Ions from certain model years in which airbags had not deployed; testing the torque performance of ignition switches from salvage yard vehicles, including Ions, HHRs, Cobalts and G5s (but not Solstice or Sky vehicles); measuring the difference among a wide variety of GM vehicles in the distance between a driver's knee and the ignition; and studying vehicles' different steering columns and shrouds, including those of the Ion and the Cobalt.

GM's FPE process consisted of several steps, beginning with investigation of the issue, then presentation of potential solutions to decision makers, and culminating in a decision and implementation of that decision. At the outset of the process, investigating engineers worked to develop a technical understanding of the issue. They then presented their findings and proposed solutions to the Field Product Evaluation Recommendation Committee ("FPERC"). The FPERC's recommendations were then presented to the Executive Field Action Decision Committee ("EFADC"), which decided on a course of action. The FPERC and EFADC could request further analysis before making recommendations or decisions as to what, if any, field action was warranted.

2012. Based on the information accessed and collected by the FPAE, the investigation sought, among other things, to determine whether there were known engineering reasons that would explain why certain reported non-deployment crashes involved 2007 and earlier model year Ion vehicles. In May 2012, the assigned FPAE studied a cross-section of steering columns and ignition switches from Chevrolet Cobalts, Chevrolet HHRs, Pontiac G5s, and Saturn Ions, in model years ranging from 2003 through 2010. The FPAE accessed, inspected, and tested these steering columns and ignition switches for torque performance at a salvage yard. Some of these ignition switches—including a number for model year 2004-2007 Ion and model year 2006-2008 HHR vehicles—exhibited torque performance below that specified by GM for the ignition switch. Because the Ion was discontinued after model year 2007, no Ion vehicles from later model years could be tested for torque performance.

The FPE investigation focused on determining the cause of these variations in torque performance by model year. A review of GM's records by those involved in the investigation did not identify design changes to the ignition switch that would explain the variations in torque performance for the 2007 and earlier model year vehicles and that of the 2008 and later model year vehicles, with the exception of the Ion which ceased production after the 2007 model year. GM also considered other components that might potentially influence the torque performance of the ignition switches, including changes made to the Cobalt's anti-theft system at the beginning of the 2008 model year. Again, no explanation was discovered. GM engineers conducted separate studies using the "Red X" and "Design for Six Sigma" problem-solving methodologies, in hopes of better understanding the differences in observed torque performance, but those, too, produced inconclusive results. These latter studies were concluded in November 2012 and January 2013, respectively.

The FPAE collected some data relating to certain Saturn Ion crashes in which airbags did not deploy and where injuries occurred, and discussed the data with at least one other investigator to evaluate whether the ignition switch in Ion vehicles may have caused or contributed to airbag non-deployment. This analysis identified two crashes involving Ion vehicles—from model years 2005 and 2007—in which the FPAE concluded that the ignition switch torque performance could potentially have resulted in airbag non-deployment upon frontal impact. These two crashes did not result in fatalities.

2013. In late April 2013, the FPAE learned that the torque performance of a GM service part ignition switch purchased after 2010 differed substantially from that of an ignition switch that was original equipment installed on a 2005 Cobalt. He also learned that others had observed and documented that the detent plunger and spring used on the service part switch differed from those used on the original equipment switch installed on the 2005 Cobalt. Shortly thereafter, GM retained outside engineering resources to conduct a comprehensive ignition switch survey and assessment. That investigation included torque performance testing, ignition switch teardowns, and x-ray analyses of ignition switches in used production vehicles both before and after the 2007 model year. The data gathered by GM's outside technical expert showed that: the ignition switches that he tested that had been installed in early-model Ion and Cobalt vehicles did not meet GM's torque specification; changes had been made to the ignition switch's detent plunger and spring several years after the start of production; and those changes most likely explained the variation from GM's specifications for torque performance observed in the original switches installed in 2007 and earlier model year vehicles.

On October 29, 2013, after dialogue with the supplier, GM was provided with supplier records showing that changes had in fact been made to the detent plunger and spring late in the 2006 calendar year. Those changes increased the switch's torque performance. Testing and analysis further determined that whether a key moves from the "run" to "accessory" position and how that key movement affects airbag deployment depends on a number of factors, including: vehicle steering inputs and path of travel immediately before key movement; the weight and load on the key ring immediately before key movement; whether the installed ignition switch meets the torque specifications that GM provided to its supplier; and the timing of the movement of the key out of the "run" position relative to the activation of the airbag's sensing algorithm of the crash event.

Upon completion of this analysis, the issue was presented to the Field Performance Evaluation Review Committee ("FPERC") and the Executive Field Action Decision Committee ("EFADC"). These two committees reviewed the findings in early December, culminating in an EFADC meeting on December 17, 2013. Factual questions were raised at that meeting that required further analysis, the findings of which were presented at a second EFADC meeting on January 31, 2014, on which date the EFADC directed a safety recall of the Chevrolet Cobalt and Pontiac G5 for model years 2005 through 2007.

As part of the FPE analysis, PowerPoint documents were prepared for purposes of presenting the investigative findings and recommendation to the EFADC on December 17, 2013, and January 31, 2014. The PowerPoint documents reflect the fact that the EFADC was asked to consider a proposed recall of only the Cobalt and G5 vehicles. The members of the EFADC received a primary slide deck in advance of the meeting. For these two meetings, a "backup" slide deck was prepared so that additional slides could be presented, as necessary, in order to respond to questions posed by EFADC members. The primary slide decks for these meetings include information relating to the FPAE's examination of the Ion and HHR vehicles and the results of field testing of vehicles' ignition switch torque performance, which reflected a number of model year 2004-2007 Ion and model year 2006-2008 HHR vehicles that were below GM specifications. The "backup" decks for these two meetings also include information relating to the FPAE's examination of key insert claims data for the Ion, HHR and Solstice vehicles, and proffered differences between the Cobalt, Ion and HHR vehicles that could explain a perceived absence of the recall condition in the Ion and HHR vehicles. These documents do not contain any information relating to the Sky vehicles. The "backup" slide decks also included factual material relating to other vehicles, including: (1) a chart, which in part reflects "Ignition Switch Position from SDM Download – Airbag Non-Deployment Incidents," and which identifies two crashes involving Ion vehicles— from model years 2005 and 2007—in which the ignition switch torque performance could potentially have resulted in airbag non-deployment upon frontal impact (also referred to as "unconfirmed reports")¹ and a statement that there were no such incidents for the HHR; (2) the review of Vehicle Owner Questionnaires ("VOQ's") for Ion and HHR vehicles; (3) photographs comparing the steering columns in Ion and Cobalt vehicles; and (4) a copy of the April 26, 2006 document approving changes to the ignition switch proposed by the supplier. It is not clear which of the backup slides were reviewed during these two meetings.

¹ These two crashes did not result in fatalities.

The submissions to the EFADC did not propose a recall of the Ion, HHR, Solstice and Sky vehicles. The data collected by the FPAE did not include the crashes involving model year 2004 Ion vehicles that resulted in fatalities in which the recall condition may have caused or contributed to the airbags' non-deployment. As stated above, these crashes have since been identified. GM has provided copies of these PowerPoint documents to NHTSA.

2014. Additional analyses were conducted in February 2014 relating specifically to the Ion, HHR, Solstice and Sky vehicles. These analyses included a collection and review of data regarding crashes involving these vehicles and allegations of airbag non-deployment. The analyses also included a search for and review of FPR and PRTS reports relating to these vehicles, regardless of model year; a number of these, initiated in 2003 and 2006, addressed complaints of stalling in Ion vehicles.² One report initiated in 2001, during pre-production development of the Ion, addressed an issue relating to the ignition switch's "passlock" system. The report stated that the causes of the problem included "low detent plunger force" in the ignition switch, and stated that an ignition switch design change had resolved the problem. A 2003 report documented an instance in which the service technician observed a stall while driving, noted that "[t]he owner had several keys on the key ring," and stated that "[t]he additional weight of the keys had worn out the ignition switch." In that instance, the technician replaced the ignition switch and the FPR was closed. Other reports primarily addressed customer complaints of not being able to start their Ions' engines, but the warranty and technical assistance data collected in support of these reports included complaints of stalling.

An EFADC meeting was held on February 24, 2014, on which date the EFADC directed a safety recall of the Chevrolet HHR and Pontiac Solstice for model years 2006 and 2007, Saturn Ion for model years 2003 through 2007, and the Saturn Sky for model year 2007.

The dealers are to replace the ignition switch. GM provided dealers notification of the recall on February 26, 2014 and March 4, 2014. GM will be providing a recall service bulletin to dealers on or about April 7, 2014. GM mailed the owner letters on March 10 and 11, 2014. Pursuant to 577.11(e), GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed.

Based on the data and information collected, reviewed, and analyzed to date, GM has identified eight frontal-impact crashes in the United States involving 2003 to 2007 model year Saturn Ion vehicles in which the recall condition may have caused or contributed to the airbags' non-deployment. Of these eight crashes, GM is currently aware of four involving the Saturn Ion that resulted in four fatalities (all of which involved 2004 model year vehicles) and six injuries of frontal occupants (which involved 2004, 2005, 2006 & 2007 model year vehicles). GM is currently aware of three frontal-impact crashes in the United States involving 2006 to 2007 model year Chevrolet HHR vehicles in which the recall condition may have caused or contributed to the airbags' non-deployment. These three crashes resulted in three injuries to frontal occupants. GM

² GM is prepared to share with NHTSA upon request the PRTS and FPR reports referenced in this document.

is not currently aware of any frontal-impact crashes in the United States involving 2006-2007 model year Pontiac Solstice or 2007 model year Saturn Sky vehicles in which the recall condition may have caused or contributed to the airbags' non-deployment. It is important to emphasize that GM continues to review data and information relating to the recalled vehicles in order to evaluate, among other things, whether there were any other crashes involving the recalled vehicles in which the recall condition may have caused or contributed to the airbags' non-deployment.

GM employees became aware of most of the aforementioned crashes within two weeks of the dates on which they occurred. As GM learned of these crashes, employees undertook to investigate the underlying facts and circumstances to determine, among other things, why the airbags had not deployed. Throughout this period, GM was involved in claims and lawsuits with respect to the Ion and HHR vehicles where the non-deployment of airbags may have been caused by the ignition switch condition. These eleven crashes in the United States are out of a total U.S. population of 748,024 vehicles subject to the Ion, HHR, Solstice and Sky recall. GM's review of data and information relating to the recalled vehicles continues.

EXHIBIT E



GENERAL MOTORS LLC
Global Vehicle Safety

(12 pages)
Supplemental

RECEIVED

By Recall Management Division at 3:23 pm, Apr 14, 2014

April 11, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-047

Dear Ms. Lewis:

This letter supersedes General Motors' letter of March 28, 2014, and is submitted pursuant to the requirements of 49 C.F.R. 573.6 as it applies to a determination by General Motors to conduct a safety-related recall for the motor vehicle equipment identified below.

573.6(c)(1) & 573.6(c)(2)(iv): General Motors Company; GM Parts and ACDelco Brands.

This safety recall involves Ignition & Start Switches manufactured in Mexico by:

Delphi Packard Electrical/Electronic Architecture
5725 Delphi Drive
M/C 483.400.301
Troy, Michigan 48098
Tel: [1] 248.813.2334
Fax: [1] 248.813.2333

573.6(c)(2),(3),(4): This information is shown on Attachment A.

573.6(c)(2)(iii),(5): General Motors has decided that a defect which relates to motor vehicle safety exists in GM Parts and ACDelco Ignition & Start Switch service part number 10392423, and the following Ignition & Start Switch Housing Kits that contain or may contain part number 10392423: GM Parts and ACDelco service part numbers 10392737, 15857948, 15854953, 15896640, and 25846762. GM records indicate these service parts may have been installed during repairs in some 2008-2010 MY Chevrolet Cobalt, 2008-2011 MY Chevrolet HHR, 2008-2010 MY Pontiac Solstice, 2008-2010 MY Pontiac G5, and 2008-2010 MY Saturn Sky vehicles.

The ignition switch torque performance on vehicles repaired with GM Parts and ACDelco Ignition & Start Switch part number 10392423 or assemblies that contain part number 10392423 may not meet General Motors' specification. If the torque performance is not to specification, the ignition switch may unintentionally move from the "run" position to the "accessory" or "off" position with a corresponding reduction or loss of power. This risk may be increased if the key ring is carrying added weight or the vehicle goes off road or



experiences some other jarring event. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Until the recall has been performed, it is very important that customers remove all items from their key rings, leaving only the vehicle key. The key fob (if applicable), should also be removed from the key ring.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the attached chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.

573.6(c)(8): Safety recall letters will be mailed to owners of all 2008-2010 MY Chevrolet Cobalt, 2008-2011 MY Chevrolet HHR, 2008-2010 MY Pontiac Solstice, 2008-2010 MY Pontiac G5, and 2008-2010 MY Saturn Sky vehicles, and their ignition switch will be replaced.

In addition, GM will issue a service parts safety bulletin to GM Dealers, ACDelco Distributors and other wholesale purchasers of part number 10392423 or service part assemblies that may contain part number 10392423, instructing them to post signs in the dealerships for over the counter sales, and identify and notify customers who may have purchased the referenced parts about the recall.

GM plans to issue preliminary notification about the recall to dealers, distributors and other parts customers the week of April 14, 2014, and subsequent bulletins and a first owner letter the week of April 21, 2014. A second owner letter will be mailed and the formal dealer bulletin and service part bulletin will be provided when parts are available.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): GM will provide copies of the dealer and customer communications, including the owner letter, under separate cover.

573.6(c)(11): GM's assigned recall number is 14092.

Sincerely,



M. Carmen Benavides, Director
Field Product Investigations & Evaluations

Attachment A 573.6(c)(2),(3),(4):

The total number of potentially defective items of equipment is 95,023.

GM records do not indicate inclusive dates of manufacture for the suspect parts.

With the exception of part number 10392423, GM records show no direct purchasers other than GM Dealers and ACDelco Distributors.

**VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE**

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	A	2008	176,471	05/29/2007	06/26/2008	Cobalt	*
Chevrolet	A	2009	141,592	04/15/2008	08/11/2009	Cobalt	"
Chevrolet	A	2010	116,275	04/16/2009	06/23/2010	Cobalt	"
Chevrolet	A	2008	99,227	05/01/2007	06/26/2008	HHR	"
Chevrolet	A	2009	80,782	04/08/2008	06/18/2009	HHR	"
Chevrolet	A	2010	64,733	04/20/2009	06/15/2010	HHR	"
Chevrolet	A	2011	68,455	04/22/2010	05/27/2011	HHR	"
Pontiac	A	2008	20,206	05/30/2007	06/23/2008	G5	"
Pontiac	A	2009	20,662	05/22/2008	08/10/2009	G5	"
Pontiac	A	2010	3	04/16/2009	04/17/2009	G5	"
Pontiac	M	2008	14,088	04/24/2007	06/19/2008	Solstice	"
Pontiac	M	2009	4,207	04/17/2008	07/28/2009	Solstice	"
Pontiac	M	2010	19	04/21/2009	05/28/2009	Solstice	"
Saturn	M	2008	12,982	04/24/2007	06/19/2008	Sky	"
Saturn	M	2009	4,078	04/17/2008	05/19/2009	Sky	"
Saturn	M	2010	8	04/23/2009	05/26/2009	Sky	"

GM Total: 823,788

* Ignition switch on all involved vehicles will be replaced.

GM Recall No. 14092

ATTACHMENT B - 573.6(c)(6)

CHRONOLOGY

**Re: Recall of 2008-2010 Chevrolet Cobalt, 2008-2011
Chevrolet HHR, 2008-2010 Pontiac Solstice, 2008-2010
Pontiac G5, and 2008-2010 Saturn Sky Vehicles**

On February 7, 2014, General Motors ("GM") notified the National Highway Transportation Safety Administration ("NHTSA") of its decision to recall 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles. By letter dated February 24, 2014, GM submitted to NHTSA a chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety, with respect to the recall of the Cobalt and G5 vehicles ("the Cobalt and G5 recall").

In making this recall determination, GM's Executive Field Action Decision Committee ("EFADC") was asked to consider a proposed recall only of the Cobalt and G5 vehicles. The submissions to the EFADC did not propose a recall of the Ion, HHR, Solstice and Sky vehicles. Following GM's announcement of the Cobalt and G5 recall on February 7, 2014, as discussed in more detail below, the decision was made to conduct a more in-depth analysis of information related to the vehicles that were listed on Service Bulletins 05-02-35-007 and 05-02-35-007A, but were not included in the February 7, 2014 recall submission to NHTSA.

On February 25, 2014, GM notified NHTSA of its decision to recall all of the other vehicles listed in the aforementioned Service Bulletins—specifically, 2003-2007 model year Saturn Ion, 2006-2007 model year Chevrolet HHR and Pontiac Solstice, and 2007 model year Saturn Sky vehicles. By letter dated March 11, 2014, GM submitted to NHTSA a chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety, with respect to the recall of the Ion, HHR, Solstice and Sky vehicles ("the Ion, HHR, Solstice and Sky recall"). Because these vehicles were equipped with the same ignition switch installed in the 2005-2007 model year Chevrolet Cobalt and 2007 model year Pontiac G5 vehicles, the chronology submitted on February 24, 2014, with respect to the Cobalt and G5 recall is relevant to GM's decision to issue the Ion, HHR, Solstice and Sky recall.

By letter dated March 28, 2014, GM notified NHTSA of its decision to recall later model year vehicles within the scope of the Cobalt and G5 recall and the Ion, HHR, Solstice and Sky recall, specifically 2008-2010 model year Chevrolet Cobalt, 2008-2011 model year Chevrolet HHR, 2008-2010 model year Pontiac Solstice, 2008-2010 model year Pontiac G5, and 2008-2010 model year Saturn Sky vehicles ("the 2008-2011 model year recall"). In addition to the events set forth in the chronologies submitted to NHTSA regarding the Cobalt and G5 recall and the Ion, HHR, Solstice and Sky recall, the following describes the principal events that were the basis for the determination, relating to the 2008-2011 model year recall, that the defect related to motor vehicle safety. GM's review of data and information relating to the recalled vehicles continues.

* * *

2004. Around the time of the launch of the 2005 Chevrolet Cobalt, GM learned of at least one incident in which a Cobalt lost engine power because the key moved out of the “run” position when the driver inadvertently contacted the key or steering column. GM employees were able to replicate this phenomenon during test drives. An engineering inquiry known within GM as a Problem Resolution Tracking System inquiry (hereinafter “PRTS”), was opened to investigate the issue. Engineers believed that low key cylinder torque effort was an issue and considered a number of potential solutions. After consideration of the lead time required, cost, and effectiveness of each of these solutions, the PRTS was closed with no action.

2005. GM employees received field reports of Chevrolet Cobalt vehicles losing engine power, including instances in which the key moved out of the “run” position when a driver inadvertently contacted the key or steering column. Further PRTS’s were opened to reassess this issue. During the course of a PRTS opened in May 2005, an engineer proposed that GM redesign the key head from a “slotted” to a “hole” configuration. That proposal was initially approved, but later cancelled. The PRTS process led to GM’s issuing Information Service Bulletin 05-02-35-007 in December 2005. This Service Bulletin provided “Information on Inadvertent Turning of Key Cylinder, Loss of Electrical System and No DTCs,” and applied to 2005-06 Chevrolet Cobalts, 2006 Chevrolet HHRs, 2005-06 Pontiac Pursuits (Canada only), 2006 Pontiac Solstices, and 2003-06 Saturn Ions. The Service Bulletin informed dealers that: “there is potential for the driver to inadvertently turn off the ignition due to low ignition key cylinder torque/effort”; “[t]he concern is more likely to occur if the driver is short and has a large and/or heavy key chain”; and “the customer should be advised of this potential and should take steps to prevent it—such as removing unessential items from their key chain.” In addition, the Service Bulletin advised that “Engineering has come up with an insert for the key ring so that it goes from a ‘slot’ design to a hole design. As a result, the key ring cannot move up and down in the slot any longer—it can only rotate on the hole.” The Service Bulletin further stated that, “[i]n addition, the previous key ring has been replaced with a smaller, 13 mm design. This will result in the keys not hanging as low as in the past.”

Certain of the reported incidents that pre-dated GM’s issuance of Service Bulletin 05-02-35-007 and GM’s public response to inquiries about those incidents were chronicled in newspaper articles that appeared in THE NEW YORK TIMES, THE PLAIN DEALER (Cleveland, OH), and THE DAILY ITEM (Sunbury, PA). GM concluded in December 2005 that the Service Bulletin and field service campaign were the appropriate response to the reported incidents, given that the car’s steering and braking systems remained operational even after a loss of engine power, and the car’s engine could be restarted by shifting the car into either neutral or park.

2006. On April 26, 2006, the GM design engineer responsible for the ignition switch installed in all of the vehicles subject to the Cobalt and G5 recall and the Ion, HHR, Solstice and Sky recall signed a document approving changes to the ignition switch proposed by the supplier. This document referred to the “GMX 357” vehicle platform, which was GM’s internal designation for the Saturn Ion. The approved changes included, among other things, the use of a new detent plunger and spring that increased torque force in the ignition switch. This change to the ignition switch was not reflected in a corresponding change in the part number for the ignition switch. GM believes that the

supplier began providing the re-designed ignition switch to GM for all of the recalled vehicles at some point during the 2007 model year.

In May 2006, a field evaluation inquiry, known within GM as a Field Performance Report ("FPR"), was opened to address customer complaints that their Saturn Ion vehicles would neither crank nor start. Attached to this FPR was a document bearing the logo of the ignition switch supplier, titled "PROPOSED PCB [printed circuit board] LAYOUT." Under "[p]roblem description," the document stated, "[s]witch presents Contact Bounces & contact permanent deformation," "[c]ustomer rejects switches," and "[f]unctional Problem when car starts." The "[p]roposed actions from Product Engineering" included "[c]hange PCB design to remove via holes from contact traces," "[e]nlarge PCB vias to avoid contactors being in via limits," and "[d]etent plunger to increase torque force to be within spec." Under "[c]urrent status for PCB," the document stated, among other things, "1.- Validation for Torque & Angle for timing corrections – DONE," "2.-GM RDE approve GM3660 – DONE," and "6.-SOP @ Condura for new PCB & Spring/Plunger – 6/30/06." The FPR was closed, citing Technical Service Bulletin 06-02-35-017.

A PRTS was opened on August 1, 2006, after a customer complained of stalling after the car's ignition switch had been replaced. This PRTS indicated that the condition could not be duplicated after more than 100 miles of driving and the PRTS was canceled on October 2, 2006.

GM updated Service Bulletin 05-02-35-007 in October 2006 to include additional vehicles and model years—specifically, the 2007 Chevrolet Cobalt, the 2007 Chevrolet HHR, the 2007 Pontiac G5, the 2007 Pontiac Solstice, the 2007 Saturn Ion, and the 2007 Saturn Sky.¹ GM's warranty records indicate that GM dealers have provided key inserts to 474 customers who brought their vehicles into dealers for service.

2007. On March 29, 2007, a group of GM employees met with NHTSA representatives in Washington, D.C. to discuss occupant restraint systems. During this meeting, a NHTSA representative informed the GM employees of a fatal crash that occurred on July 29, 2005, in which a 2005 Cobalt was involved in a frontal collision, the airbags did not deploy, and data retrieved from the car's sensing and diagnostic module ("SDM") indicated that the car's power mode status was "accessory." While GM Legal Staff opened a file relating to this crash in September 2005, the GM employees meeting with NHTSA on this occasion were not aware of the crash at the time of the meeting. After this meeting, a GM investigating engineer was tasked with tracking crashes in which Cobalts were involved in frontal impacts and the airbags did not deploy, in order to try to identify common characteristics of these crashes. Data from the vehicles' SDMs were available for nine of the crashes, and that data showed that the ignition was in the "run" position in five of the crashes and in the "accessory" position in four of the crashes. Such information was not available for Saturn Ion vehicles because they were equipped with an SDM that was not designed to record when the engine was not running.

A meeting between GM engineers and representatives of Continental, the supplier of the SDMs used in the Cobalt, took place in or about August 2007. During this meeting,

¹ GM's records contain references to a second update of the Service Bulletin in July 2011, which covered the same models and model years as the first update in October 2006. However, upon investigation, GM believes that the Service Bulletin was not updated in July 2011.

Continental representatives discussed SDM data downloaded from a 2005 model year Cobalt vehicle involved in a frontal-impact crash in which the airbags did not deploy.

GM discontinued production of the Ion at the end of the 2007 model year, as previously planned.

2009. In February 2009, another PRTS was opened and resulted in the top of the key being changed from a "slot" design to a "hole" design. According to the PRTS, "[c]ustomers with substantially weighted key chains/additional keys hanging from ignition key have experienced accidental ignition shut-off. Changing from a slot to a hole will significantly reduce downward force and the likelihood of this occurrence." This key design change was implemented in model year 2010 Cobalts.

On or about May 15, 2009, several GM engineers met with representatives of Continental, the supplier of the SDMs used in the Cobalt. In the fourteen frontal-impact crashes for which SDM data was then available, the ignition was recorded in "run" for seven of the crashes and in the "accessory" position for the other seven. Prior to this meeting, GM had provided Continental with two SDMs from crashes involving a 2005 Cobalt and a 2006 Cobalt in which the airbags had not deployed and the SDM data indicated that the car's ignition switch was in the "run" position at the time of the crash (the SDM from the 2005 Cobalt was provided in 2007). During this meeting, Continental representatives informed the GM engineers that, according to further stored data inaccessible to GM engineers but retrieved by Continental, the SDM's sensing algorithm had been disabled at the time of the crash, and discussed reasons why this may have happened. Although GM engineers had identified other crashes in which airbags had not deployed and the ignition switch was recorded in the "run" position at the time of the crash, GM engineers were not able to obtain the SDMs from the vehicles involved in these crashes for further interrogation by Continental.

2010. During the summer of 2010, GM discontinued production of the Cobalt at the end of the 2010 model year, as previously planned.

2011. In late July 2011, a meeting was held at GM involving Legal Staff, Field Performance Assessment ("FPA") and Product Investigations personnel who would be involved in the Field Performance Evaluation ("FPE") process. Soon thereafter, in August 2011, a Field Performance Assessment Engineer ("FPAE") was assigned to move forward with an FPE investigation of a group of crashes in which airbags in 2005-2007 model year Chevrolet Cobalts and a 2007 Pontiac G5 had not deployed during frontal impacts, which also included a review of information related to the Ion, HHR and Solstice vehicles. This FPE investigation did not identify frontal-impact crashes involving 2004 model year Saturn Ion vehicles that resulted in fatalities in which the recall condition may have caused or contributed to the airbags' non-deployment.

During the course of the FPE investigation, the FPAE's analyses included the following: reviewing data relating to complaints of stalling in the Ion for all model years; reviewing data relating to crashes involving Ions from certain model years in which airbags had not deployed; testing the torque performance of ignition switches from salvage yard vehicles, including Ions, HHRs, Cobalts and G5s (but not Solstice or Sky vehicles); measuring the difference among a wide variety of GM vehicles in the distance between a driver's knee

and the ignition; and studying vehicles' different steering columns and shrouds, including those of the Ion and the Cobalt.

GM's FPE process consisted of several steps, beginning with investigation of the issue, then presentation of potential solutions to decision makers, and culminating in a decision and implementation of that decision. At the outset of the process, investigating engineers worked to develop a technical understanding of the issue. They then presented their findings and proposed solutions to the Field Product Evaluation Recommendation Committee ("FPERC"). The FPERC's recommendations were then presented to the Executive Field Action Decision Committee ("EFADC"), which decided on a course of action. The FPERC and EFADC could request further analysis before making recommendations or decisions as to what, if any, field action was warranted.

2012. Based on the information accessed and collected by the FPAE, the investigation sought, among other things, to determine whether there were known engineering reasons that would explain why certain reported non-deployment crashes involved 2007 and earlier model year vehicles. In May 2012, the assigned FPAE studied a cross-section of steering columns and ignition switches from Chevrolet Cobalts, Chevrolet HHRs, Pontiac G5s, and Saturn Ions, in model years ranging from 2003 through 2010. The FPAE accessed, inspected, and tested these steering columns and ignition switches for torque performance at a salvage yard. Some of these ignition switches—including a number for model year 2004-2007 Ion and model year 2006-2008 HHR vehicles—exhibited torque performance below that specified by GM for the ignition switch. Because the Ion was discontinued after model year 2007, no Ion vehicles from later model years could be tested for torque performance. The most prevalent shortfalls in performance were observed on ignition switches found in 2007 and earlier model year vehicles.

The FPE investigation focused on determining the cause of these variations in torque performance by model year. A review of GM's records by those involved in the investigation did not identify design changes to the ignition switch that would explain the variations in torque performance for the 2007 and earlier model year vehicles and that of the 2008 and later model year vehicles, with the exception of the Ion which ceased production after the 2007 model year. GM also considered other components that might potentially influence the torque performance of the ignition switches, including changes made to the Cobalt's anti-theft system at the beginning of the 2008 model year. Again, no explanation was discovered. GM engineers conducted separate studies using the "Red X" and "Design for Six Sigma" problem-solving methodologies, in hopes of better understanding the differences in observed torque performance, but those, too, produced inconclusive results. These latter studies were concluded in November 2012 and January 2013, respectively.

The FPAE collected some data relating to certain Saturn Ion crashes in which airbags did not deploy and where injuries occurred, and discussed the data with at least one other investigator to evaluate whether the ignition switch in Ion vehicles may have caused or contributed to airbag non-deployment. This analysis identified two crashes involving Ion vehicles—from model years 2005 and 2007—in which the FPAE concluded that the ignition switch torque performance could potentially have resulted in airbag non-deployment upon frontal impact. These two crashes did not result in fatalities.

2013. In late April 2013, the FPAE learned that the torque performance of a GM service part ignition switch purchased after 2010 differed substantially from that of an ignition switch that was original equipment installed on a 2005 Cobalt. He also learned that others had observed and documented that the detent plunger and spring used on the service part switch differed from those used on the original equipment switch installed on the 2005 Cobalt. Shortly thereafter, GM retained outside engineering resources to conduct a comprehensive ignition switch survey and assessment. That investigation included torque performance testing, ignition switch teardowns, and x-ray analyses of ignition switches in used production vehicles both before and after the 2007 model year. The data gathered by GM's outside technical expert showed that: the ignition switches that he tested that had been installed in early-model Ion and Cobalt vehicles did not meet GM's torque specification; changes had been made to the ignition switch's detent plunger and spring several years after the start of production; and those changes most likely explained the variation from GM's specifications for torque performance observed in the original switches installed in 2007 and earlier model year vehicles.

On October 29, 2013, after dialogue with the supplier, GM was provided with supplier records showing that changes had in fact been made to the detent plunger and spring late in the 2006 calendar year. Those changes increased the switch's torque performance. Testing and analysis further determined that whether a key moves from the "run" to "accessory" position and how that key movement affects airbag deployment depends on a number of factors, including: vehicle steering inputs and path of travel immediately before key movement; the weight and load on the key ring immediately before key movement; whether the installed ignition switch meets the torque specifications that GM provided to its supplier; and the timing of the movement of the key out of the "run" position relative to the activation of the airbag's sensing algorithm of the crash event.

Upon completion of this analysis, the issue was presented to the FPERC and the EFADC. These two committees reviewed the findings in early December, culminating in an EFADC meeting on December 17, 2013. Factual questions were raised at that meeting that required further analysis, the findings of which were presented at a second EFADC meeting on January 31, 2014, on which date the EFADC directed a safety recall of the Chevrolet Cobalt and Pontiac G5 for model years 2005 through 2007.

2014. As part of the FPE analysis, PowerPoint documents were prepared for purposes of presenting the investigative findings and recommendation to the EFADC on December 17, 2013, and January 31, 2014. The PowerPoint documents reflect the fact that the EFADC was asked to consider a proposed recall of only the Cobalt and G5 vehicles. The members of the EFADC received a primary slide deck in advance of the meeting. For these two meetings, a "backup" slide deck was prepared so that additional slides could be presented, as necessary, in order to respond to questions posed by EFADC members. The primary slide decks for these meetings include information relating to the FPAE's examination of the Ion and HHR vehicles and the results of field testing of vehicles' ignition switch torque performance, which reflected a number of model year 2004-2007 Ion and model year 2006-2008 HHR vehicles that were below GM specifications. The "backup" decks for these two meetings also include information relating to the FPAE's examination of key insert claims data for the Ion, HHR and Solstice vehicles, and proffered differences between the Cobalt, Ion and HHR vehicles that could explain a

perceived absence of the recall condition in the Ion and HHR vehicles. These documents do not contain any information relating to the Sky vehicles. The "backup" slide decks also included factual material relating to other vehicles, including: (1) a chart, which in part reflects "Ignition Switch Position from SDM Download - Airbag Non-Deployment Incidents," and which identifies two crashes involving Ion vehicles—from model years 2005 and 2007—in which the ignition switch torque performance could potentially have resulted in airbag non-deployment upon frontal impact (also referred to as "unconfirmed reports")² and a statement that there were no such incidents for the HHR; (2) the review of Vehicle Owner Questionnaires ("VOQ's") for Ion and HHR vehicles; (3) photographs comparing the steering columns in Ion and Cobalt vehicles; and (4) a copy of the April 26, 2006 document approving changes to the ignition switch proposed by the supplier. It is not clear which of the backup slides were reviewed during these two meetings.

The submissions to the EFADC did not propose a recall of the Ion, HHR, Solstice and Sky vehicles. The data collected by the FPAE did not include the crashes involving model year 2004 Ion vehicles that resulted in fatalities in which the recall condition may have caused or contributed to the airbags' non-deployment. As stated above, these crashes have since been identified. GM has provided copies of these PowerPoint documents to NHTSA.

Additional analyses were conducted in February 2014 relating specifically to the Ion, HHR, Solstice and Sky vehicles. These analyses included a collection and review of data regarding crashes involving these vehicles and allegations of airbag non-deployment. The analyses also included a search for and review of FPR and PRTS reports relating to these vehicles, regardless of model year; a number of these, initiated in 2003 and 2006, addressed complaints of stalling in Ion vehicles. One report initiated in 2001, during pre-production development of the Ion, addressed an issue relating to the ignition switch's "passlock" system. The report stated that the causes of the problem included "low detent plunger force" in the ignition switch, and stated that an ignition switch design change had resolved the problem. A 2003 report documented an instance in which the service technician observed a stall while driving, noted that "[t]he owner had several keys on the key ring," and stated that "[t]he additional weight of the keys had worn out the ignition switch." In that instance, the technician replaced the ignition switch and the FPR was closed. Other reports primarily addressed customer complaints of not being able to start their Ions' engines, but the warranty and technical assistance data collected in support of these reports included complaints of stalling.

An EFADC meeting was held on February 24, 2014, on which date the EFADC directed a safety recall of the Chevrolet HHR and Pontiac Solstice for model years 2006 and 2007, Saturn Ion for model years 2003 through 2007, and the Saturn Sky for model year 2007.

In late February and early March 2014, while implementing the Cobalt and G5 recall (the "First Recall") and the Ion, HHR, Solstice and Sky recall (the "Second Recall"), certain GM personnel involved in the implementation of the recalls observed that the ignition switch at issue, GM Parts Ignition & Start Switch service part number 10392423 (the

² These two crashes did not result in fatalities.

“subject ignition switch”), could be found in Ignition & Start Switch Housing Kits (“housing kits”) associated with other service part numbers.

On or about March 3, 2014, GM personnel identified certain housing kits that contained or potentially contained the subject ignition switch. Personnel researched GM dealer repair order data that had been reported to GM to determine whether those housing kits may have been used as service parts in vehicles outside the vehicle populations included in the First and Second Recalls.

During the weeks of March 3 and March 10, research into GM’s repair order database indicated that housing kits with the subject ignition switch may have been used to repair certain 2008-2011 model year vehicles whose makes and models fell within the scope of the First and Second Recalls (hereafter the “2008-2011 Model Year Vehicles”).

On or about March 4 or 5, 2014, GM engineering confirmed through testing that the subject ignition switch could function in 2008-2011 Model Year Vehicles, even though those vehicles should have utilized a different ignition switch bearing a different service part number (Ignition & Start Switch service part number 15886190).

On March 19 and 20, 2014, the EFADC was presented with information regarding the potential use of the subject ignition switch in 2008-2011 Model Year Vehicles. Specifically, the presentation materials at both meetings identified the following five housing kits that contained or potentially contained the subject ignition switch: Ignition & Start Switch Housing Kit service part numbers 10392737, 15857948, 15854953, 15896640, and 25846762. The presentation included data from GM dealer repair orders, showing that the subject ignition switch or one of the identified housing kits may have been used to repair as many as 2,664 2008-2011 Model Year Vehicles.

The presentation materials for the March 19 and March 20 EFADC meetings showed that the vast majority of these instances—2,543 of 2,664—were associated with the potential use of Ignition & Start Switch Housing Kit service part number 25846762. According to the presentation, the bill of material for that housing kit did not list the subject ignition switch, but instead called for ignition switch number 15886190 to be used. The housing kit was included in the EFADC presentation because GM personnel had learned that some of the boxes labeled with the 25846762 part number erroneously contained a housing kit that contained the subject ignition switch.

The EFADC presentation also included repair order data showing that the subject ignition switch or one of the identified housing kits may have been used to repair 111 GM vehicles whose makes and models fell outside the scope of the First and Second Recalls (this number was reduced to 109 GM vehicles by March 28, 2014, when GM notified NHTSA of its decision to recall later model year vehicles within the scope of the First and Second Recalls). GM engineers determined that the subject ignition switch was mechanically or electrically incompatible with vehicles outside of the makes and models included in the First and Second Recalls. Nevertheless, the 111 vehicles were contemplated as being included in the “Potential Field Remedy” in the EFADC presentation materials. The “Potential Field Remedy” proposed the following: “Vehicles outside the Safety Recalls population that had [part number] 10392423, 10392737, 15857948, 15854953, 15896640

or 25846762 installed as replacement parts should be returned for inspection and replacement of the ignition switch if [part number] 10392423 is found.”

On March 26, 2014, a third EFADC meeting was held. The EFADC considered expanding the field action beyond the population of vehicles identified in repair order data to include all model year 2008-2011 vehicles in the First and Second Recalls. The presentation materials proposed the alternative “Potential Field Remedy” of replacing all ignition switches in the 2008-2011 model year population. The presentation showed the population to be approximately 970,808 vehicles in the United States, Canada, Mexico, Europe, Japan, and Columbia. It projected the cost of the proposed action to be approximately \$39.7 million.

Out of an abundance of caution and to provide a replacement switch to all customers whose vehicles could have been impacted by the subject ignition switch, the EFADC decided that GM would expand the First and Second Recalls to include all 2008-2011 Model Year Vehicles. Safety recall letters will be mailed to the owners of all 2008-2010 model year Chevrolet Cobalt, 2008-2011 model year Chevrolet HHR, 2008-2010 model year Pontiac Solstice, 2008-2010 model year Pontiac G5, and 2008-2010 model year Saturn Sky vehicles, and the vehicles’ ignition switch will be replaced.

In addition, a safety recall letter will be mailed to the owner of any other vehicle, not subject to the First or Second Recall, identified in GM records as being repaired with the subject ignition switch or one of the five identified housing kits. Dealers will inspect the vehicle and, if the subject ignition switch is found, replace it with a new one. GM’s review of data and information relating to the recalled vehicles continues.

EXHIBIT F



GENERAL MOTORS LLC
Global Vehicle Safety

July 2, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-355

Dear Ms. Lewis:

This letter supersedes General Motors' letter of June 20, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2005-2009 model year (MY) Buick Lacrosse, 2006-2011 MY Buick Lucerne, 2000-2005 MY Cadillac Deville, 2006-2011 MY Cadillac DTS, 2006-2014 MY Chevrolet Impala and 2006-2007 MY Chevrolet Monte Carlo vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of June 20, 2014.

573.6(c)(1): Buick, Cadillac and Chevrolet Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2005-2009 model year (MY) Buick Lacrosse, 2006-2011 MY Buick Lucerne, 2000-2005 MY Cadillac Deville, 2007-2011 MY Cadillac DTS, 2006-2014 MY Chevrolet Impala and 2006-2007 MY Chevrolet Monte Carlo vehicles. If the key ring is carrying added weight and the vehicle goes off road or experiences some other jarring event, it may unintentionally move the key away from the "run" position. If this occurs, engine power, power steering and power braking will be affected, increasing the risk of a crash. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Until the recall has been performed, it is very important that customers remove all items from their key ring, leaving only the vehicle key. The key fob (if applicable), should also be removed from the key ring.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of



principal events that were the basis for the determination that the defect related to motor vehicle safety.

On June 20, 2014, GM submitted a 573 letter to NHTSA advising NHTSA that the Safety and Field Action Decision Authority (SFADA) had decided to conduct a Safety Recall relating to 2005-2009 model year (MY) Buick Lacrosse, 2006-2011 MY Buick Lucerne, 2000-2005 MY Cadillac Deville, 2006-2011 MY Cadillac DTS, 2006-2014 MY Chevrolet Impala and 2006-2007 MY Chevrolet Monte Carlo vehicles. The chronology below describes the principal events that led to the determination to issue a Safety Recall.

2005

In the summer of 2005, GM was preparing to launch two models on the GM W platform, the 2006 Impala and the 2006 Monte Carlo. As part of the roll out of the 2006 Impala, GM provided early, saleable vehicles to certain GM employees who were participating in the Product Evaluation Program (PEP). These early, saleable vehicles were designated Captured Test Fleet (CTF) vehicles. In August 2005, a GM employee assigned a 2006 Impala CTF vehicle reported a potential safety issue through the GM CTF reporting system. The employee reported that the vehicle stalled after hitting a large bump when going from gravel road to pavement while driving at about 45 mph. On August 24, 2005, the GM employee took the vehicle to the GM Service and Parts Operations at the GM Technical Center in Warren, Michigan.

Over several days in August 2005, GM Technicians checked the vehicle and test drove the vehicle more than 400 miles, including over bumpy roads. The technicians were not able to duplicate the condition reported in the CTF report and returned the vehicle to the GM employee.

2014

An email relating to the August 2005, CTF report was identified during a document review being conducted in relation to the Cobalt ignition switch recall. The email was brought to the attention of the Product Investigation group on April 30, 2014, and a Product Investigator was assigned to investigate the issues raised in the email on May 1, 2014. Between May 1, 2014, and June 6, 2014, the investigator worked with GM subject matter experts to gather and analyze data relating to the ignition switch used on the 2006 Impala and other similar ignition switches. GM test personnel conducted lab tests on the ignition switches and determined that, although the ignition switches themselves performed below the target specification, the ignition system as a whole as installed in the vehicles' steering columns performed approximately at the target specification. GM also collected and began review of information from GM's databases, including its TREAD, warranty, customer satisfaction, and Engineering Analysis databases, and NHTSA's Vehicle Owners' Questionnaire (VOQ) database relating to vehicles using the ignition switch parts under review. On June 6, 2014, the investigator made a presentation regarding the ignition switch investigation at an Open Investigation Review (OIR) meeting.

Following the June 6, 2014, Open Investigations Review (OIR) meeting, GM personnel at the Milford Proving Grounds conducted road testing of the Impala and other vehicles using the ignition switches under review to analyze the performance of the subject ignition systems

under various driving conditions. The road testing indicated that, when a slotted key is carrying added weight, the torque performance of the ignition system may be insufficient to resist energy generated when a vehicle goes off road or experiences some other jarring event, potentially resulting in the unintentional movement of the key away from the "run" position. Testing on keys with holes instead of slots indicated that the torque performance of the ignition system on the subject vehicles would be sufficient to resist the force generated by the driving conditions tested.

On June 11, 2014, the investigator presented to the SFADA. The SFADA did not make a decision at the June 11, 2014, meeting because the investigator had not yet completed review of the GM and NHTSA data. The SFADA directed that the review of that data be completed in time for an SFADA meeting on June 13, 2014. The investigator completed review of the GM and NHTSA data and presented to the SFADA at the Milford Proving Grounds on June 13. The SFADA directed the investigator to work with other GM personnel to further refine the potential recall population so that it accurately included the vehicles using the identified ignition switches that were subject to the condition identified during the road tests. On June 15, 2014, the SFADA met and decided to conduct a Safety Recall of that population of vehicles.

On June 16, 2014, GM announced its decision to issue a Safety Recall. On June 20, 2014, GM submitted a 573 letter to NHTSA advising NHTSA of the SFADA's June 15, 2014, decision to conduct a Safety Recall. GM's June 20 letter states that, until the recall has been performed, it is very important that customers remove all items from their key ring, leaving only the vehicle key; the key fob (if applicable) should also be removed from the key ring.

573.6(c)(8): Dealers are to install two 13mm key rings and key insert into all involved vehicle's ignition keys.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors does not plan to provide notice about reimbursement to owners because the provided repair has not previously been available.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14299.

Sincerely,



Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Buick	W	2005	81,894	05/31/2004	06/27/2005	LaCrosse	*
Buick	W	2006	76,034	04/12/2005	06/19/2006	LaCrosse	"
Buick	W	2007	54,933	04/18/2006	07/17/2007	LaCrosse	"
Buick	W	2008	41,966	05/15/2007	07/25/2008	LaCrosse	"
Buick	W	2009	18,532	04/08/2008	01/27/2009	LaCrosse	"
Buick	H	2006	85,979	08/02/2005	06/19/2006	Lucerne	"
Buick	H	2007	85,924	04/12/2006	06/19/2007	Lucerne	"
Buick	H	2008	66,119	05/15/2007	07/21/2008	Lucerne	"
Buick	H	2009	31,752	05/02/2008	08/13/2009	Lucerne	"
Buick	H	2010	20,530	04/09/2009	06/09/2010	Lucerne	"
Buick	H	2011	31,888	05/04/2010	06/02/2011	Lucerne	"
Cadillac	K	2000	93,742	05/18/1999	06/29/2000	DeVille	"
Cadillac	K	2001	90,139	03/10/2000	06/08/2001	DeVille	"
Cadillac	K	2002	92,946	02/14/2001	06/27/2002	DeVille	"
Cadillac	K	2003	79,381	04/11/2002	06/20/2003	DeVille	"
Cadillac	K	2004	75,019	03/26/2003	06/16/2004	DeVille	"
Cadillac	K	2005	58,624	03/18/2004	06/24/2005	DeVille	"
Cadillac	K	2006	67,405	05/10/2005	06/19/2006	DTS	"
Cadillac	K	2007	48,944	04/11/2006	06/19/2007	DTS	"
Cadillac	K	2008	42,481	03/14/2007	07/21/2008	DTS	"
Cadillac	K	2009	17,656	05/02/2008	08/13/2009	DTS	"
Cadillac	K	2010	16,609	04/09/2009	06/09/2010	DTS	"
Cadillac	K	2011	18,460	05/04/2010	05/24/2011	DTS	"

573.6(c)(2)(3)(4) (Continued)

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
				<u>(FROM)</u>	<u>(TO)</u>		
Chevrolet	W	2006	274,547	02/25/2005	06/20/2006	Impala	"
Chevrolet	W	2007	279,486	03/27/2006	06/11/2007	Impala	"
Chevrolet	W	2008	332,839	03/19/2007	07/25/2008	Impala	"
Chevrolet	W	2009	192,926	04/25/2008	06/17/2009	Impala	"
Chevrolet	W	2010	157,525	04/16/2009	06/10/2010	Impala	"
Chevrolet	W	2011	177,624	04/10/2010	06/17/2011	Impala	"
Chevrolet	W	2012	172,104	04/19/2011	06/15/2012	Impala	"
Chevrolet	W	2013	131,793	04/12/2012	06/06/2013	Impala	"
Chevrolet	W	2014	66,103	04/26/2013	06/09/2014	Impala	"
Chevrolet	W	2006	38,138	06/09/2005	06/20/2006	Monte Carlo	"
Chevrolet	W	2007	21,689	04/21/2006	06/19/2007	Monte Carlo	"
GM Total:			3,141,731				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Dalian Alps Electronics Company LTD

6 Han Zheng rd.
Jinzhou district Dalian 116100 PR of China
+86 41187687110

The parts are manufactured in China.

EXHIBIT G



GENERAL MOTORS LLC
Global Vehicle Safety

(5 pages) Amended

RECEIVED

By Recall Management Division at 3:44 pm, Jul 16, 2014

July 16, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-400

Dear Ms. Lewis:

This letter supersedes General Motors' letter of July 3, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2000-2005 model year (MY) Chevrolet Impala and Monte Carlo, 1997-2005 MY Chevrolet Malibu, 1999-2004 MY Oldsmobile Alero, 1998-2002 MY Oldsmobile Intrigue, 1999-2005 MY Pontiac Grand Am and 2004-2008 MY Pontiac Grand Prix vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of July 3, 2014.

573.6(c)(1): Chevrolet, Oldsmobile and Pontiac Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2000-2005 MY Chevrolet Impala and Monte Carlo, 1997-2005 MY Chevrolet Malibu, 1999-2004 MY Oldsmobile Alero, 1998-2002 MY Oldsmobile Intrigue, 1999-2005 MY Pontiac Grand Am, and 2004-2008 MY Pontiac Grand Prix vehicles. If the key ring is carrying added weight and the vehicle goes off road or experiences some other jarring event, it may unintentionally move the key away from the "run" position. If this occurs, engine power, power steering and power braking may be affected, increasing the risk of a crash. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Until the recall has been performed, it is very important that customers remove all items from their key ring, leaving only the vehicle key. The key fob (if applicable), should also be removed from the key ring.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of



principal events that were the basis for the determination that the defect related to motor vehicle safety.

2003

In 2003, GM learned of a customer complaint of intermittent vehicle shut offs in a MY 2003 Grand Am from a Michigan dealership. Despite multiple attempts, the dealership could not duplicate the condition. GM's Brand Quality Manager for the Grand Am personally visited the dealership and requested that the customer demonstrate the problem. The customer had an excess key ring and mass (containing approximately 50 keys and a set of brass knuckles), and was able to recreate the shut off upon driving over a speed bump at approximately 30-35 mph. On January 7, 2003, GM opened PRTS 0084/2003. On May 22, 2003, GM issued a voicemail to dealerships describing the condition and identifying the relevant population of vehicles as 1999 through 2003 MY Chevrolet Malibu, Oldsmobile Alero, and Pontiac Grand Am. The notice directed dealers to pay attention to the key size and mass of the customer's key ring in order to better diagnose the customer's complaint. On July 24, 2003, Engineering Work Order (EWO) 211722 was initiated to increase the detent plunger force on the ignition switch replacing P/N 22688239 with P/N 22737173. This was a running change made in 2004 to the Malibu, Grand Am and the Alero. The production and service stock disposition for P/N 22688239 was designated "use", so it is possible that P/N 22688239 was used to service vehicles.

2004

On March 17, 2004, EWO 317693 was initiated to increase the detent plunger force on the ignition switch on the Grand Prix in order to maintain commonality between the Grand Prix and the Malibu, Grand Am and the Alero. The old Grand Prix part number, P/N10310896, was not changed to a new part number when the detent plunger force was changed, rather P/N 10310896 remained the part number for the new ignition switch. The service stock disposition was designated "use", so it is possible that the old switch was used to service vehicles.

2014

On May 22, 2014, NHTSA forwarded to GM Director of Global Policy and GM Director of Field Product Investigations and Evaluations a link to Service Bulletin No. 052203, issued in 2003, for the 1999-2003 MY Malibu, Alero and Grand Am. On June 4, 2014, a Product Investigations Engineer was assigned to investigate ignition switches used on the 1999-2003 MY Malibu, Grand Am and Alero; the investigation expanded to include a number of additional model vehicles. Between June 6, 2014 and June 24, 2014, the investigator worked with GM subject matter experts to gather and analyze data relating to the ignition switches used on the Malibu, Grand Am and Alero vehicles, as well as to identify other vehicles in which the relevant ignition switches were used. GM also collected and reviewed information from GM's databases, including its TREAD, warranty, customer satisfaction, and Engineering Analysis databases, and NHTSA's Vehicle Owners' Questionnaire (VOQ) database relating to vehicles using the ignition switch parts under review. From approximately June 13 through June 24, 2014, cars identified in the investigation were evaluated at the Milford Proving Ground. The road testing on the recall population indicated

that, when the slotted key with a ring is carrying added weight, the torque performance of the ignition system may be insufficient to resist energy generated when a vehicle goes off road or experiences some other jarring event, potentially resulting in the unintentional movement of the key away from the "run" position.

On June 26, 2014, the investigator made a presentation to the Safety and Field Action Decision Authority (SFADA), which decided to conduct a Safety Recall of 2000-2005 MY Chevrolet Impala and Monte Carlo, 1997-2005 MY Chevrolet Malibu, 1999-2004 MY Oldsmobile Alero, 1998-2002 MY Oldsmobile Intrigue, 1999-2005 MY Pontiac Grand Am and 2004-2008 MY Pontiac Grand Prix vehicles.

573.6(c)(8): Dealers are to install two key rings and key cover on all ignition keys.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors does not plan to provide notice about reimbursement to owners because the provided repair has not previously been available.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14350.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	W	2000	199,328	11/20/1998	06/13/2000	Impala	*
Chevrolet	W	2001	188,251	05/04/2000	06/25/2001	Impala	"
Chevrolet	W	2002	201,467	03/22/2001	06/19/2002	Impala	"
Chevrolet	W	2003	512,664	03/21/2002	06/18/2003	Impala	"
Chevrolet	W	2004	559,600	04/08/2003	06/24/2004	Impala	"
Chevrolet	W	2005	486,224	03/31/2004	06/15/2005	Impala	"
Chevrolet	N	1997	100,450	10/04/1996	07/30/1997	Malibu Classic	"
Chevrolet	N	1998	231,086	06/06/1997	08/20/1998	Malibu Classic	"
Chevrolet	N	1999	213,870	03/30/1998	07/26/1999	Malibu Classic	"
Chevrolet	N	2000	215,601	04/22/1999	06/23/2000	Malibu Classic	"
Chevrolet	N	2001	186,794	03/23/2000	06/27/2001	Malibu Classic	"
Chevrolet	N	2002	144,950	03/26/2001	05/31/2002	Malibu Classic	"
Chevrolet	N	2003	177,260	03/01/2002	05/30/2003	Malibu Classic	"
Chevrolet	N	2004	98,025	03/13/2003	06/02/2004	Malibu Classic	"
Chevrolet	N	2005	83,060	03/31/2004	05/06/2005	Malibu Classic	"
Chevrolet	W	2000	61,063	03/24/1999	06/13/2000	Monte Carlo	"
Chevrolet	W	2001	68,518	05/05/2000	06/25/2001	Monte Carlo	"
Chevrolet	W	2002	137,140	03/22/2001	06/19/2002	Monte Carlo	"
Chevrolet	W	2003	67,785	03/26/2002	06/18/2003	Monte Carlo	"
Chevrolet	W	2004	62,396	04/07/2003	06/23/2004	Monte Carlo	"
Chevrolet	W	2005	35,876	04/06/2004	06/08/2005	Monte Carlo	"
Oldsmobile	N	1999	121,339	04/08/1998	07/28/1999	Alero	"
Oldsmobile	N	2000	118,392	04/14/1999	07/17/2000	Alero	"
Oldsmobile	N	2001	112,413	04/04/2000	06/27/2001	Alero	"
Oldsmobile	N	2002	79,372	03/27/2001	05/31/2002	Alero	"
Oldsmobile	N	2003	92,874	02/25/2002	05/30/2003	Alero	"
Oldsmobile	N	2004	69,524	03/07/2003	04/30/2004	Alero	"

14350

573.6(c)(2)(3)(4) (Continued)

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
				<u>(FROM)</u>	<u>(TO)</u>		
Oldsmobile	W	1998	99,037	11/11/1996	08/19/1998	Intrigue	"
Oldsmobile	W	1999	86,482	03/31/1998	07/02/1999	Intrigue	"
Oldsmobile	W	2000	73,382	04/07/1999	06/30/2000	Intrigue	"
Oldsmobile	W	2001	39,455	03/28/2000	06/15/2001	Intrigue	"
Oldsmobile	W	2002	25,010	03/19/2001	06/13/2002	Intrigue	"
Pontiac	N	2000	225,333	03/31/1999	07/18/2000	Grand Am	"
Pontiac	N	2001	182,220	03/30/2000	06/27/2001	Grand Am	"
Pontiac	N	2002	154,308	03/26/2001	05/31/2002	Grand Am	"
Pontiac	N	2003	299,796	10/15/1997	07/29/1999	Grand Am	"
Pontiac	N	2003	139,818	02/25/2002	05/30/2003	Grand Am	"
Pontiac	N	2004	171,929	03/07/2003	06/04/2004	Grand Am	"
Pontiac	N	2005	61,526	03/31/2004	05/06/2005	Grand Am	"
Pontiac	W	2004	179,560	10/24/2002	06/25/2004	Grand Prix	"
Pontiac	W	2005	107,997	04/01/2004	06/24/2005	Grand Prix	"
Pontiac	W	2006	116,472	04/27/2005	06/19/2006	Grand Prix	"
Pontiac	W	2007	77,690	04/12/2006	04/25/2007	Grand Prix	"
Pontiac	W	2008	64,405	03/14/2007	11/30/2007	Grand Prix	"
GM Total:			6,729,742				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Stoneridge INC
Pollak Engineered Products
300 Dan Rd
Canton, MA 02021
Phone: (248) 489-9300

The ignition switch is manufactured in the US and China.

EXHIBIT H



GENERAL MOTORS LLC
Global Vehicle Safety

July 16, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-394

Dear Ms. Lewis:

This letter supersedes General Motors' letter of July 2, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving certain 2003-2014 model year (MY) Cadillac CTS and 2004-2006 MY Cadillac SRX vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of July 2, 2014.

573.6(c)(1): Cadillac Brand of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in certain 2003-2014 MY Cadillac CTS and 2004-2006 MY Cadillac SRX vehicles. If the key ring is carrying added weight and the vehicle goes off road or experiences some other jarring event, or if the driver unintentionally bumps the key ring or items attached to the key ring with their knee, the key may unintentionally move away from the "run" position. If this occurs, engine power, power steering and power braking may be affected, increasing the risk of a crash. The timing of the key movement out of the "run" position, relative to the activation of the sensing algorithm of the crash event, may result in the airbags not deploying, increasing the potential for occupant injury in certain kinds of crashes.

Customers should remove all items from their key rings, including the key fob, leaving only the ignition key. In addition it is very important that drivers adjust their seat and steering column to allow clearance between their knee and the ignition key.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.



2002-2003

The Cadillac CTS was introduced in 2002 as a 2003 MY vehicle. Generation I of the CTS was produced in 2003-2007 MYs. The Generation I CTS used a Delphi ignition switch (P/N 12450257).

2004

The Cadillac SRX was introduced in 2003 as a 2004 MY vehicle. 2004-2006 MY Cadillac SRX used a Delphi ignition switch (P/N 1240257).

2006

In 2006, the Delphi ignition switch for the Cadillac SRX 2007 MY was redesigned with a stronger detent plunger. The part number was changed (new P/N 15261531) and this part was used in the 2007-2009 MY Cadillac SRX. In a letter to NHTSA dated April 11, 2014, Delphi informed NHTSA that Delphi's records reflected that this change was made at GM's request following some test driver reports that they turned the vehicles off with their knees while driving "competitively."

2007-2008

The Generation II Cadillac CTS was introduced in 2007 as a 2008 MY vehicle. Generation II Cadillac CTS uses an ignition switch manufactured by Dalian Alps Electronics Company LTD (P/N 92184907).

2010

In January 2010, Engineering Work Order (EWO) DYKMHB was issued to change the key ring opening on the Cadillac CTS key from a slot to a hole. Although the EWO states that the change was made to prevent accidental ignition shut off for customers with heavy key chains, this was not the purpose of the change. This language appears to have been inadvertently included from an earlier EWO relating to non-Cadillac models. The purpose of the key ring opening design change for the CTS was to reduce an observed nuisance of the key fob contacting the driver's leg. The new key design was introduced in December 2010. This design was used on Cadillac CTS vehicles from December 2010 through 2014 MY.

2011

In October 2011, a GM employee assigned a 2012 MY Cadillac CTS vehicle, which employed a key designed with a hole rather than a slot, reported a potential safety issue through the GM Company Vehicle Evaluation Program (CVEP) reporting system. The employee reported that contact between the key fob and his knee had resulted in an unintentional switching off of the ignition. The issue was reviewed by the CTS Current Product Improvement Team (CPIT). The CPIT decided not to seek a change in design unless the company received additional complaints about the condition.

2012

In April 2012, a GM employee assigned a 2012 MY Cadillac CTS, which employed a key designed with a hole rather than a slot, experienced stalls while driving on two occasions. The employee brought the vehicle into the GM Service and Parts Operations at the GM Technical Center in Warren, Michigan. A member of GM's Red X Team test drove the vehicle, but was unable to replicate the event. She then met with the GM employee, who demonstrated that the key inadvertently moved out of run when he hit the key with his knee. The GM employee was over six feet tall and sat with his seat moved forward while driving so that he sat very close to the wheel and his knee was very close to the key. The employee demonstrated the event while the vehicle was stationary and not while moving. The Red X employee drafted a Red X Problem Resolution Tracking System (PRTS) report (PRTS 1271912) and proposed that the CTS keys with holes be replaced by keys with slots. A Current Production PRTS (PRTS 1276454) was opened in May 2012 and it was assigned to GM Engineering for review. PRTS 1276454 was closed in June 2013. No key design change was implemented on the basis that the "hole" design was consistent with a document called Human Vehicle Interface (HVI) 266. HVI 266 provided that the location of the ignition cylinder should ensure that a remote keyless entry fob, hanging from the key ring, will not contact the 95th percentile upper or lower legs with the key inserted. The Red X Team member who opened the PRTS noted on the document that she did not believe that the action taken in response to the PRTS resolved the problem observed.

2014

In response to the ignition switch issues relating to the Cobalt and related vehicles, the company undertook a "read across" to determine whether there may be similar issues with other ignition switches on other vehicles. On April 3, 2014, a Product Investigations Engineer was assigned to investigate ignition switches used on the Cadillac CTS vehicles; the investigation expanded to include SRX vehicles. Between April 3, 2014 and May 20, 2014, the investigator worked with GM subject matter experts to gather and analyze data relating to the ignition switches used on the Cadillac CTS and SRX vehicles. GM also collected and reviewed information from GM's databases, including its TREAD, warranty, customer satisfaction, and Engineering Analysis databases, and NHTSA's Vehicle Owners' Questionnaire (VOQ) database relating to vehicles using the ignition switch parts under review. On May 20, 2014, the investigator presented the matter to the Investigation Status Review committee (ISR). Following the May 20 ISR, as part of the rigorous lab and road testing that was being conducted at the Milford Proving Grounds in June 2014, CTS and SRX vehicles were evaluated. The road testing of the pre-2008 Cadillac CTS and the pre-2007 MY Cadillac SRX indicated that when a slotted key on a key ring is carrying added weight the torque performance of the ignition system may be insufficient to resist energy generated when a vehicle goes off road or experiences some other jarring event, potentially resulting in the unintentional movement of the key away from the "run" position. The road testing indicated 2008 MY and later Cadillac CTS and 2007 and later Cadillac SRX vehicles did not experience this condition. The testing at the Milford Proving Grounds also included evaluation regarding potential "knee to key" related inadvertent key rotation. This testing indicated that the Cadillac CTS vehicles with keys with a hole and a single key ring between

key and fob were potentially subject to inadvertent key rotation when the driver's knee came into contact with the vehicle's key. This testing was completed on June 23, 2014.

On June 25, 2014, the investigator made a presentation to the SFADA, which decided to conduct a Safety Recall of 2003-2014 Model Year (MY) Cadillac CTS and 2004-2006 MY Cadillac SRX vehicles. GM submitted a 573 letter to NHTSA on July 2, 2014. The letter stated in part: "Customers should remove all items from their key rings, including the key fob, leaving only the ignition key. In addition it is very important that drivers adjust their seat and steering column to allow clearance between their knee and the ignition key."

The issue was presented during an Investigation Status Review (ISR) on May 20, 2014, and on June 25, 2014, the Safety and Field Action Decision Authority (SFADA) decided to conduct a safety recall.

573.6(c)(8): Dealers are to provide two replacement key rings. Vehicles with slotted keys will also receive key inserts.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors does not plan to provide notice about reimbursement to owners because the provided repair has not previously been available.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14172.

Sincerely,



Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Cadillac	D	2003	68,326	08/16/2001	06/06/2003	CTS	*
Cadillac	D	2004	55,998	03/05/2003	05/17/2004	CTS	"
Cadillac	D	2005	61,362	02/18/2004	06/03/2005	CTS	"
Cadillac	D	2006	55,092	03/14/2005	05/05/2006	CTS	"
Cadillac	D	2007	53,363	03/07/2006	06/27/2007	CTS	"
Cadillac	D	2008	40,723	05/01/2007	06/06/2008	CTS	"
Cadillac	D	2009	32,227	03/31/2008	06/26/2009	CTS	"
Cadillac	D	2010	29,292	02/12/2009	06/07/2010	CTS	"
Cadillac	D	2011	31,586	04/20/2010	06/02/2011	CTS	"
Cadillac	D	2012	28,434	03/03/2011	06/08/2012	CTS	"
Cadillac	D	2013	18,604	04/04/2012	07/29/2013	CTS	"
Cadillac	D	2014	258	03/22/2013	04/28/2014	CTS	"
Cadillac	E	2004	31,051	03/20/2003	05/17/2004	SRX	"
Cadillac	E	2005	23,563	03/09/2004	06/03/2005	SRX	"
Cadillac	E	2006	24,449	03/30/2005	08/11/2006	SRX	"
GM Total:			554,328				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): The ignition switch supplier for 2003 - 2007 MY CTS and 2004 - 2006 MY SRX is:

Delphi Packard Electrical/Electronic Architecture
 5725 Delphi Drive
 M/C 483.400.301
 Troy, Michigan 48098
 Phone: 248-813-2334

The country of origin was Mexico.

EXHIBIT I



GENERAL MOTORS LLC
Global Vehicle Safety

(3 pages)

RECEIVED

By Recall Management Division at 7:37 am, Aug 08, 2014

August 7, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2002-2004 model year (MY) Saturn VUE vehicles.

573.6(c)(1): Saturn Brand of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in certain 2002-2004 MY Saturn VUE vehicles. Some of these vehicles may have a condition in which the ignition key may be removed when the ignition is not in the "Off" position. If the ignition key is removed when the ignition is not in the "Off" position, unintended vehicle motion may occur: (a) for an automatic transmission, if the transmission is not in "Park"; or (b) for a manual transmission, if the parking brake is not engaged and the transmission is not in reverse gear. This could result in a vehicle crash and occupant or pedestrian injuries.

Until the recall repairs have been performed, it is very important before exiting the vehicle for customers to make sure the vehicle is in "Park," or in the case of a manual transmission, to put the transmission into reverse gear and set the parking brake.

573.6(c)(6): Following General Motors' April 9, 2014 announcement of NHTSA Campaign Number 14V171000, General Motors reviewed field and warranty data for potential instances of ignition cylinders that permit the operator to remove the ignition key when the key is not in the "Off" position in vehicles outside of the Campaign 14V171000 population.

With respect to 2002 through 2004 model year Saturn VUE vehicles, General Motors identified 152 reports (out of a total vehicle population of 215,243) of vehicle roll away and/or ignition keys being removed when the key is not in the "Off" position.

General Motors reviewed this data with NHTSA on June 17, 2014, July 7, 2014, and July 24, 2014.



General Motors' Open Issue Review panel reviewed the data on July 28, 2014, and on July 31, 2014, General Motors' Safety Field Action Decision Authority decided to conduct a safety-related recall. .

573.6(c)(8): Dealers are to inspect for key pull out or key binding and, if necessary, replace the ignition cylinder and replace the key set (2 keys).

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors will provide reimbursement to owners for repairs according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14506.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Saturn	Z	2002	35,316	09/11/2001	06/12/2002	Vue	*
Saturn	Z	2003	109,444	04/11/2002	08/25/2003	Vue	"
Saturn	Z	2004	57,395	06/10/2003	04/06/2004	Vue	"
GM Total:			202,155				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Huf North America
 395 T. Elmer Cox Drive
 Mt. Pleasant Industrial Park
 Greenville, TN 37743
 Phone # 423-787-8500

The ignition lock cylinders are manufactured in the USA.

EXHIBIT J



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

1200 New Jersey Avenue SE
Washington, DC 20590

October 3, 2014

Mr. Brian Latouf
Director, Field Product Investigations and Evaluations
General Motors LLC
30001 Van Dyke - Mail Code 480-210-2V
Warren, MI 48090-9055

NVS-215KS
14V-540

Subject: Knee Contact may Turn Ignition Switch Off

Dear Mr. Latouf:

This letter serves to acknowledge General Motors LLC's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

CHEVROLET/CAPRICE/2011-2013
PONTIAC/G8/2008-2009

Mfr's Report Date: September 4, 2014

NHTSA Campaign Number: 14V-540

Components:

ELECTRICAL SYSTEM:IGNITION

Potential Number of Units Affected: 46,873

Problem Description:

General Motors LLC (GM) is recalling certain model year 2011-2013 Chevrolet Caprice vehicles manufactured October 15, 2010, to December 6, 2013, and 2008-2009 Pontiac G8 vehicles manufactured July 25, 2007, to February 29, 2008. In the affected vehicles, the driver may accidentally hit the ignition key with their knee, unintentionally knocking the key out of the run position, turning off the engine.

Consequence:

If the key is not in the run position, the air bags may not deploy if the vehicle is involved in a crash, increasing the risk of injury. Additionally, a key knocked out of the run position could cause loss of engine power, power steering, and power braking, increasing the risk of a vehicle crash.

Remedy:

GM will notify owners, and dealers will remove the key blade from the original flip key/RKE transmitter assemblies, and cut and fit a revised key blade and housing assembly, in which the blade has been indexed by 90 degrees, to the original RKE transmitter assembly. The manufacturer has not yet provided a notification schedule. Owners may contact Chevrolet customer service at 1-800-222-1020 and Pontiac customer service at 1-800-762-2737. GM's number for this recall is 14445. Note: Until the recall has been performed, it is very important that drivers adjust their seat and steering column to allow clearance between their knee and the ignition key.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

Please be reminded of the following requirements:

You are required to submit a draft owner notification letter to this office no less than five days prior to mailing it to the customers. Also, copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

You are required to provide an estimated date including month, day, and year, when you will send notifications to owners, dealers, and distributors as soon as it becomes available. Please be reminded that it is required that owners be notified of a safety defect in their vehicles within 60 days of a manufacturer's notification to NHTSA of a safety defect in those vehicles.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at kelly.schuler@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement

EXHIBIT K



GENERAL MOTORS LLC
Vehicle Safety and Crashworthiness

- AA

By Recall Management Division at 9:21 am, Apr 01, 2014

14V-117

(6 pages) - Supplemental

March 31, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-117

Dear Ms. Lewis:

This letter supersedes General Motors' letter of March 17, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a noncompliance recall involving 2009-2014 model year Chevrolet Express and GMC Savana vehicles as described below. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(7), 573.6(c)(8) and 573.6(c)(11) below supersedes information included in General Motors' letter of March 17, 2014.

573.6(c)(1): Chevrolet and GMC Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on on Attachment A.

573.6(c)(5): General Motors has decided that 2009-2014 model year Chevrolet Express and GMC Savana vehicles with a GVWR of 10,000 pounds and below equipped with front passenger air bags fail to conform to Federal Motor Vehicle Safety Standard (FMVSS) 201, Occupant Protection in Interior Impact. On these vehicles, during a frontal impact below the air bag deployment threshold, if an unrestrained front passenger head hits the instrument panel above where the passenger airbag is located, it may decelerate at a rate exceeding the requirements of FMVSS 201, resulting in a greater risk of injury.

573.6(c)(7): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(7), General Motors now submits the attached chronology of principal events that were the basis for the determination of the noncompliance with a motor vehicle safety standard. See Attachment B.

573.6(c)(8): Dealers will modify the passenger instrument panel.

GM sent recall dealer bulletin for 14082 on March 26, 2014, and anticipates mailing the owner letters mid April 2014.

GM will provide the mail dates for dealer bulletin 14105 and the owner letters.



Pursuant to 577.11(e), GM does not plan to provide notice about reimbursement to owners because this remedy was not previously known to or available from dealers or other service providers.

573.6(c)(10): GM will provide the dealer bulletins and owner letters under separate cover.

573.6(c)(11): GM's assigned recall number is 14082 for heavy duty (GVWR of 8,600 to 10,000 pounds) 2009-2014 model year Chevrolet Express and GMC Savana vehicles and 14105 for light duty (GVWR of less than 8,600 pounds) 2009-2014 model year Chevrolet Express and GMC Savana vehicles. GM decided to assign a separate recall number because the repair for the heavy duty truck has already been released. The bulletin for the light duty trucks will be released at a later time. The scope of the overall vehicles and populations has not changed.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with a large, stylized initial "M" and a long, sweeping tail.

M. Carmen Benavides, Director
Product Investigations and Safety Regulations

14082 and 14105

Attachment A - 573.6(c)(2),(3),(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	G	2009	17,326	01/27/2009	06/10/2009	Express	*
Chevrolet	G	2010	43,430	05/05/2009	09/01/2010	Express	"
Chevrolet	G	2011	46,628	06/15/2010	08/17/2011	Express	"
Chevrolet	G	2012	57,031	05/31/2011	07/13/2012	Express	"
Chevrolet	G	2013	51,378	05/14/2012	06/18/2013	Express	"
Chevrolet	G	2014	32,953	04/18/2013	03/07/2014	Express	"
GMC	G	2009	2,163	01/27/2009	06/10/2009	Savana	"
GMC	G	2010	8,375	05/05/2009	09/01/2010	Savana	"
GMC	G	2011	9,119	06/15/2010	08/17/2011	Savana	"
GMC	G	2012	11,178	06/28/2011	07/13/2012	Savana	"
GMC	G	2013	10,864	06/06/2012	06/18/2013	Savana	"
GMC	G	2014	12,568	04/15/2013	03/06/2014	Savana	"
GM Total:			303,013				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Not applicable – this is a vehicle integration issue.

14082 and 14105

Attachment B - 573.6(c)(7)

On or around January 30, 2014, GM supplier Inteva Products notified a GM engineer with responsibility for the instrument panel trim of the Chevrolet Express and GMC Savana vehicles that the resin used to mold the instrument panel on those vehicles, IP 1000 resin, would become unavailable in the coming months. Inteva requested approval to use XCY620S resin as a substitute material for the trim panel on these vehicles.

On February 21, 2014, GM received material stress strain curves for IP1000 and XCY620S resin from Inteva Products. Analysis of those curves would allow GM to evaluate the effect of the resin change on compliance with FMVSS 201 for Chevrolet Express and GMC Savana vehicles with GVWR of 10,000 pounds and below with front passenger air bags ("GMT 610").

On February 24, 2014, GM personnel reviewed the material stress strain curves and the last physical tests of the GMT 610 instrument panel trim area for FMVSS 201 compliance. The last physical tests had been conducted in November 2001 (for the 2003 model year GMT 610), although GM engineers continued to evaluate FMVSS 201 compliance on an annual basis. The decision was made to perform computer-aided engineering ("CAE") analysis to further evaluate any possible effect of the resin change on FMVSS 201 compliance.

Later that day, CAE analysis was performed. The results showed that the performance of the existing and proposed replacement resin was similar, but that neither material's stress strain curve was closely correlated with the results of physical testing of the passenger-side instrument panel conducted in 2001. The CAE results also showed potential FMVSS 201 non-compliance for both the existing and proposed resins.

GM engineers subsequently identified as the potential cause for the anomalous CAE results a change made during production in early 2009 to the passenger-side air bag housing, which replaced the original steel housing with molded plastic. The new plastic housing was stiffer than the steel housing and reduced the air gap between the air bag and the instrument panel. This change was analyzed in 2008 for compliance with FMVSS 208, but appeared not to have been analyzed for any potential impact on FMVSS 201 compliance.

On February 25, 2014, the issues regarding potential FMVSS 201 non-compliance and testing regarding the passenger-side instrument panel were discussed at the weekly Vehicle and Process Integration Review meeting, which included members of the validation, GMT 610 program, and subsystem teams.

On February 27, 2014, the Product Investigations team was informed of the potential non-compliance issue with the passenger-side instrument panel, and an Internal Investigation Engineer was assigned the following day.

Beginning on or around February 27, 2014, preparations were made for physical FMVSS 201 testing of the instrument panel.

On March 5, 2014, a meeting was held to brief the leadership team (including the Vice President of Global Vehicle Engineering and the Executive Director of Interior Engineering) on the status of the potential FMVSS 201 non-compliance issue. The decision was made that if physical tests indicated potential non-compliance, the matter would be immediately referred to the Field Performance Evaluation ("FPE") process.

On March 6, 2014, FMVSS 201 physical testing was conducted on the passenger-side instrument panel of the 2014 model year GMT 610 heavy-duty vehicle. The results indicated potential FMVSS 201 non-compliance.

On March 7, 2014, the director of Global Field Performance Evaluation was notified of the potential non-compliance issue with regard to the GMT 610 heavy-duty vehicle during a conference call that began at approximately 12:30 p.m. eastern time.

At approximately 1:15 p.m. Eastern time that afternoon, the GM Wentzville Assembly Center in Wentzville, Missouri (where all GMT 610 vehicles are produced) received instructions to stop shipment on GMT 610 heavy-duty vehicles. The plant then stopped shipment of all model year 2013 and 2014 GMT 610 light-duty and heavy-duty vehicles. The Wentzville plant suspended production of both light-duty and heavy-duty GMT 610 vehicles as of approximately 3:30 p.m. that day. The plant did not resume production until March 13, 2014 (for the light-duty GMT 610) and March 18, 2014 (for the heavy-duty GMT 610) after the production remedy for each vehicle had been validated.

On March 7, 2014, FMVSS 201 physical testing was conducted on the passenger-side instrument panel on the 2014 model year GMT 610 light-duty vehicle. The results indicated potential FMVSS 201 non-compliance.

On March 10, 2014, the potential FMVSS 201 non-compliance issue was presented to the Field Performance Evaluation Review Committee ("FPERC"), which recommended a non-compliance recall for 2008-2014 model year GMT 610 vehicles.

On March 11, 2014, the potential FMVSS 201 non-compliance issue was presented to the Executive Field Action Decision Committee ("EFADC") at its regularly-scheduled morning meeting. The determination was made at this meeting that 2008-2014 model year heavy-duty GMT 610 vehicles were not in compliance with FMVSS 201. The root cause was described as follows: "In 2008 model year, the passenger air bag container was changed from steel to plastic without analysis or testing to determine the effect on FMVSS 201 compliance." The EFADC agreed to allow additional review and analysis of the light-duty GMT 610, and to meet the next morning to discuss it.

Later that morning, the FMVSS 201 non-compliance issue for the GMT 610 was discussed at the regularly-scheduled Investigation Status Review meeting.

During the late afternoon/early evening of March 11, 2014, further physical tests were conducted on the passenger-side instrument panel of the GMT 610 light-duty vehicle. Those additional tests showed potential non-compliance with FMVSS 201.

On March 12, 2014, the EFADC held a telephone meeting to review the further testing conducted on the light-duty GMT 610, and the determination was made that light-duty GMT 610 vehicles were also not compliant with FMVSS 201. The Wentzville plant reported that it began installing the new airbag module on GMT 610 heavy-duty vehicles on January 27, 2009 (using new part number 25920672), and that it began installing the new airbag module on GMT 610 light-duty vehicles on February 5, 2009 (using new part number 25920671). These production dates confirmed that the new airbag module was not installed in any 2008 model year vehicles. The recall period thus was determined to begin in model year 2009, and not model year 2008.

On March 13, 2014, the FMVSS non-compliance issue was presented to the Field Performance Evaluation Team. On the same day, the Wentzville plant resumed production of light-duty GMT 610 vehicles using a remedy that had been validated for FMVSS 201 compliance based on physical tests conducted on March 10 and March 12. This fix consisted of lowering the placement of the passenger airbag by 6mm.

On March 14, 2014, GM informed NHTSA of the potential FMVSS 201 non-compliance issue.

On March 17, 2014, GM sent NHTSA a non-compliance notification letter in accordance with the requirements of 49 C.F.R. § 573.6.

On March 18, 2014, the Wentzville plant resumed the production of GMT 610 heavy-duty vehicles, using a remedy that had been validated for FMVSS 201 compliance based on physical tests conducted on March 17. The heavy-duty production remedy consisted of lowering the airbag placement by 6mm and adding an energy absorbing "brow" to the passenger-side instrument panel. Attachment of these brows to GMT 610 heavy-duty vehicles at the plant began on March 20, 2014.

14082 and 14105

EXHIBIT L



GENERAL MOTORS LLC
Vehicle Safety and Crashworthiness

- AA

RECEIVED

By Recall Management Division at 9:03 am, Apr 01, 2014

14V-118

(9 pages) Supplemental

March 31, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-118

Dear Ms. Lewis:

This letter supersedes General Motors' letter of March 17, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety-related recall for some 2008 - 2009 and all 2010 - 2013 model year Buick Enclave, GMC Acadia vehicles, some 2009 and all 2010 - 2013 model year Chevrolet Traverse vehicles, and some 2008 - 2009 and all 2010 model year Saturn Outlook vehicles. Vehicles repaired as part of Customer Satisfaction Campaign 10085 and Special Coverage 10335 have already had the subject condition repaired and therefore are not included in the safety recall. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6), 573.6(c)(8) and 573.6(c)(10) below supersedes information included in General Motors' letter of March 17, 2014.

573.6(c)(1): General Motors Company: Buick, Chevrolet, GMC and Saturn Brands

573.6(c)(2)(3)(4): This information is shown on on Attachment A.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in some 2008 - 2009 and all 2010 - 2013 model year Buick Enclave, GMC Acadia vehicles, some 2009 and all 2010 - 2013 model year Chevrolet Traverse vehicles, and some 2008 - 2009 and all 2010 model year Saturn Outlook vehicles..

Corrosion and/or loose crimps in the driver and passenger seat mounted side impact airbag (SIAB) wiring harness connectors can cause an increase in resistance. The airbag sensing system will interpret an increase in resistance as a fault. A fault will illuminate the airbag readiness light on the instrument cluster and a "SERVICE AIR BAG" message in the Driver Information Center (DIC), and set a Diagnostic Trouble Code (DTC). At first, at lower levels of resistance, the light and DIC message may be intermittent and the airbags and pretensioners will still deploy. Over time, the resistance may reach a level where the SIABs, front center side airbag, if equipped, and pretensioners will not deploy in a crash.



Letter to Ms. Nancy Lewis
N140030 573 Letter Revised
March 31, 2014
Page 2

573.6(c)(6): The issue was presented to the Field Performance Evaluation Review Committee, and on March 14 and March 16, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall. See Attachment B. General Motors now submits the attached chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety. Upon request, General Motors is prepared to share with NHTSA, additional documentation related to this recall.

573.6(c)(8): Dealers will remove the driver and passenger SIAB wiring harness connectors and splice and solder the wires together.

GM sent the dealer bulletin on March 25, 2014., and anticipates mailing owner letters in April 2014.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): GM will provide copies of the dealer bulletin and owner letter under separate cover.

573.6(c)(11): GM's assigned recall number is 14030.

Sincerely,



M. Carmen Benavides, Director
Product Investigations and Safety Regulations

14030
Attachment

Attachment A - 573.6(c)(2),(3),(4)

**VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE**

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	RV	2009	74,332	06/06/2008	07/30/2009	Traverse	*
Chevrolet	RV	2010	82,719	05/01/2009	06/04/2010	Traverse	"
Chevrolet	RV	2011	128,819	04/15/2010	06/24/2011	Traverse	"
Chevrolet	RV	2012	117,452	04/12/2011	10/04/2012	Traverse	"
Chevrolet	RV	2013	62,891	08/06/2012	05/30/2013	Traverse	"
Buick	RV	2008	30,292	01/23/2007	07/18/2008	Enclave	"
Buick	RV	2009	37,028	04/14/2008	06/19/2009	Enclave	"
Buick	RV	2010	48,102	04/22/2009	06/04/2010	Enclave	"
Buick	RV	2011	69,869	04/15/2010	06/24/2011	Enclave	"
Buick	RV	2012	70,051	04/20/2011	10/04/2012	Enclave	"
Buick	RV	2013	38,531	08/07/2012	05/30/2013	Enclave	"
GMC	RV	2008	37,603	04/19/2007	07/18/2008	Acadia	"
GMC	RV	2009	44,644	04/15/2008	06/19/2009	Acadia	"
GMC	RV	2010	56,769	04/22/2009	06/04/2010	Acadia	"
GMC	RV	2011	87,546	04/15/2010	06/24/2011	Acadia	"
GMC	RV	2012	102,991	04/12/2011	10/04/2012	Acadia	"
GMC	RV	2013	53,598	08/08/2012	05/30/2013	Acadia	"
Saturn	RV	2008	15,075	04/10/2007	07/18/2008	Outlook	"
Saturn	RV	2009	14,461	04/14/2008	06/19/2009	Outlook	"
Saturn	RV	2010	3,634	04/22/2009	03/18/2010	Outlook	"
GM Total:			1,176,407				

* All involved vehicles will be corrected as necessary.

Vehicles repaired as part of Customer Satisfaction Campaign 10085 and special coverage 10335 have already had the subject condition repaired and therefore are not included in the safety recall.

573.6(c)(2)(iv):

The manufacturers of the subject wiring harness are:

Model years 2008 - 2012

Hamlin Electronics
612 East Lake St.
Lake Mills, WI 53551
(920) 648-2311
Country of origin: Mexico.

Model year 2013

Yazaki North America Inc.
6801 Haggerty Rd.
Canton, MI 48187
(734) 983-4234
Country of origin: Nicaragua.

14030 / 14V-118

Updated 3-21-14 to add Country of origin for Hamlin Electronics

ATTACHMENT B – 573.6(c)(6)

From October 2013 to March 2014, a Field Performance Evaluation (“FPE”) investigator analyzed issues related to side impact airbag (SIAB) connectors in certain GM vehicles built on the Lambda platform: the Buick Enclave, GMC Acadia, Chevrolet Traverse, and Saturn Outlook. That review resulted in a Safety Recall on March 17, 2014 for certain 2008–13 model year (“MY”) vehicles. The chronology below describes the principal events that led to the determination to issue a Safety Recall.

2006 - 2007

In 2006, GM launched two models on the Lambda platform,¹ the 2007 Saturn Outlook and the GMC Acadia. The following year, GM launched an additional model on the Lambda platform, the 2008 MY Buick Enclave.

The Lambda vehicles initially used a non-sealed Delphi 2-way connector with a gold-gold terminal interface to connect the seat wire harness to the front occupant SIAB. In July 2007, GM began using a non-sealed JST 2-way connector with a tin-tin terminal interface for the SIAB connection to the wire harness, rather than the Delphi connector.

2008

In 2008, GM launched a fourth vehicle on the Lambda platform, the 2009 Chevrolet Traverse, and continued to manufacture the Buick Enclave, Saturn Outlook, and GMC Acadia.

As early as June 2008, GM became aware of a significant increase in warranty claims for an illuminated airbag service light in 2008 MY Lambda vehicles. GM reviewed warranty claim data between June 2008 and the fall of 2008 and determined that airbag service lights in the 2008 MY vehicles illuminated due to increased resistance in the airbag wiring. An increase in resistance above a certain level, measured in ohms, triggers the airbag service light; an increase in resistance significantly above that level could lead to the possible non-deployment of a SIAB in the event of an above deployment threshold side impact crash.

In September 2008, GM directed its connector supplier, JST, to analyze the connectors. JST found that the primary cause of high resistance was wear and fretting corrosion on contact surfaces. JST recommended a change to gold plated terminals from tin to help prevent corrosion. GM engineers confirmed the condition as analyzed by JST on September 26, 2008.

In October 2008, GM initiated an FPE investigation. The investigation indicated that the volume of warranty claims could be addressed by the regular program warranty. In addition, the condition would “self declare” with the illumination of the “SERVICE AIR BAG” light, notifying the customer to report for service. GM issued a Technical Service Bulletin on November 25, 2008 for 2008-09 Buick Enclaves, 2009 Chevrolet Traverse, 2008-09 GMC Acadia, and 2008-09 Saturn

¹ The Lambda platform is comprised of 2007–10 Saturn Outlook, 2008-14 GMC Acadia, 2008-14 Buick Enclave, and 2009-14 Chevrolet Traverse. The Saturn Outlook was not produced after model year 2010, and the Chevrolet Traverse was launched with model year 2009.

Outlook vehicles, and supplemented it on January 15, 2009. The Bulletin directed dealers to repair vehicles reporting certain diagnostic codes associated with the condition by using Nyogel grease, securing the connectors, and adding slack to the line. In addition, GM had begun a transition from tin to gold terminals.

The investigation was then closed without further action.

2009

In 2009, GM continued to monitor warranty data and dealer feedback on the Lambda vehicles. In November 2009, GM's Service Operations received reports of 2010 Chevrolet Malibu and Pontiac G6² captive fleet vehicles also presenting with illuminated "SERVICE AIR BAG" lights. GM conducted a review to understand the root cause of the condition in the Malibu and Pontiac G6 and found corrosion consistent with terminal wear. The 2010 Malibu and Pontiac G6 used at least two connectors, including a JST connector that had also been used in Lambda vehicles built in 2008.

2010

In January 2010, an FPE investigation was initiated to review the 2010 Malibu and Pontiac G6 airbag connector issues. The FPE investigation concluded that in certain vehicles the airbag connector terminal pins showed signs of wear that could lead to corrosion. Over time, the corrosion could cause system resistance that would result in a "SERVICE AIR BAG" light illuminating. If a customer ignored the light, the resistance could rise to the level that a SIAB might not deploy in a side impact crash.

On May 11, 2010, GM's Executive Field Action Decision Committee ("EFADC"), upon the recommendation of the Field Performance Evaluation Review Committee ("FPERC"), made a determination to issue a Customer Satisfaction Bulletin (#10085) for Malibu and G6 vehicles. Dealers were instructed to secure both front seat-mounted side impact airbag wire harnesses, and if necessary, reroute the wire harness.³

During the same early- to mid-2010 period, GM examined warranty data for the 2008-09 Buick Enclave, GMC Acadia, and Saturn Outlook and the 2009 Chevrolet Traverse.⁴ That review took

² The Malibu and Pontiac are not built on the Lambda platform.

³ GM subsequently opened a second FPE investigation relating to 2010 Malibu and Pontiac G6 vehicles in September 2010. GM had received reports of vehicles with illuminated airbag service lights, notwithstanding that those vehicles were repaired pursuant to the prior field action (#10085). Per #10085, certain Malibu vehicles had wiring re-routed, but did not have the connector replaced. In March 2011, GM issued a Customer Satisfaction Bulletin (#11034). Dealers were instructed to inspect and determine if the repair under #10085 included the replacement of the two connectors. If the connectors were replaced, no further action was required on these vehicles. If they were not replaced, dealers were instructed to install the new connectors.

⁴ The Lambda vehicles were not included in the 2010 Malibu/Pontiac G6 FPE investigation in January 2010 because a bulletin addressing the Lambda connector issues had been released in November 2008, and so as not to delay the Malibu/Pontiac G6 investigation in order to compile the information needed to include Lambda vehicles.

place from February through May 2010. The analysis indicated another increase in the volume of warranty claims on these Lambda vehicles.

In July 2010, the FPE investigator involved in the 2010 Malibu/Pontiac G6 investigation was also assigned to review the Lambda airbag connectors. In August 2010, the investigator analyzed warranty claim data for model years 2008-09 to determine how many Lambda vehicles had repeat warranty claims after being repaired pursuant to the bulletin issued in 2008. The investigator prepared a presentation that included data from vehicle owner questionnaires regarding repeat repairs and buybacks related to the airbag service light. Warranty data reflected more than 6,800 repeat repairs, indicating that the bulletin issued in November 2008 and supplemented in January 2009, was not entirely effective in correcting the condition. The investigator found that movement of the connector may result in corrosion or tin plating wear. The investigator noted that corrosion or plating wear could affect system resistance.

The issue was presented to the FPERC on October 15, 2010 and to the EFADC on October 27, 2010. On November 23, 2010, GM issued a Customer Satisfaction bulletin (#10085C) for certain 2008 Buick Enclave, 2008 Saturn Outlook, 2008 GMC Acadia vehicles built from October 2007 to March 2008. This bulletin updated a prior bulletin (#10085B) issued in July 2010 that covered repairs for 2010 Malibu and Pontiac G6 vehicles. The bulletin instructed dealers to secure front SIAB wire harnesses and, if necessary, re-route or replace the SIAB connectors. GM also issued a Special Coverage Program (#10335) for the rest of the population of these model years.

2011

On February 3, 2011, GM issued a revised Customer Satisfaction Bulletin (#10085D). Bulletin #10085D revised the service procedure previously announced in November 2010 (#10085C), requiring the replacement of the front seat-mounted side impact airbag connectors in all vehicles. Bulletin #10085D covered the same model vehicles as Bulletin #10085C. As of 2014, GM understands that more than 90% of Lambda vehicles and Malibu and Pontiac G6 vehicles covered by the Customer Satisfaction actions have been repaired.

On March 14, 2011, GM issued a revised Special Coverage Bulletin (#10335B), providing extended warranty coverage for 2008-09 Buick Enclave, 2009 Chevrolet Traverse, 2008-09 GMC Acadia, and 2008-09 Saturn Outlook vehicles with respect to the airbag connectors. Bulletin #10335B specified that two parts should be used to replace the front-seat mounted SIAB connectors without charge to customers.

In July 2011, GM replaced the JST connector with a Tyco 4-way silver-silver sealed connector for 2012 MY vehicles. The silver-silver connector was an improvement because silver-silver terminals are not susceptible to fretting corrosion.

2012

In 2012, GM continued to monitor warranty data and observed another significant increase in warranty claims relating to the SIAB connectors for vehicles built in the second half of 2011. GM and one of its seat airbag wiring suppliers, Yazaki, conducted further testing of the airbag connectors. In July 2012, Yazaki reported to GM that in its analysis of a connector from a 2012 MY Traverse, which had an illuminated airbag service light, it found voids and other issues with the crimping of the connector terminal, which could cause increased system resistance. In October 2012, GM engineers analyzed several Tyco connectors and found no fretting corrosion, but did find inadequate crimping.

On November 8, 2012, GM issued an internal bulletin for the 2011-12 Buick Enclave, Chevrolet Traverse, and GMC Acadia. The bulletin recommended that dealers respond to customer complaints of illuminated airbag service lights, or airbag service lights that illuminate intermittently, by replacing the original connector with a new sealed connector.

2013

In 2013, call volume to GM's Technical Assistance Center increased, as did buyback activity due to illuminated airbag service lights. In September 2013, GM drafted a proposed technical service bulletin regarding airbag connectors in 2011-13 Buick Enclave, Chevrolet Traverse, and GMC Acadia vehicles.

Upon review of the proposed bulletin and in light of the prior significant warranty activity, GM opened an FPE investigation on October 4, 2013 regarding airbag connector issues in 2011-13 Enclave, Acadia, and Traverse vehicles. The last model year of the Saturn Outlook was 2010, so at the time the investigation was opened, Outlook was not included. As compared to the 2010 FPE process regarding Lambda vehicles, this investigation focused on model years 2011-13, which had been built in the periods after the #10085D Customer Satisfaction and #10335B Special Coverage programs were released.

From October 2013 to December 2013, GM reviewed and analyzed extensive warranty data for vehicles built from 2010 to 2014. The data reflected an increase in warranty claims for vehicles built in late 2011 and early 2012.

2014

On February 10, 2014, the FPE investigator made a presentation to the FPERC. The presentation described fretting corrosion and crimping issues as technical root causes of the condition.⁵ In addition to a summary of warranty data regarding 2010-14 MY Acadia, Traverse, Outlook, and Enclave vehicles, the presentation included an analysis of the levels of resistance at which the "SERVICE AIR BAG" light would illuminate (3.67 ohms) and at which the airbags might not deploy (12.2 ohms).

The proposed field action as of the FPERC meeting on February 10, 2014 was Special Coverage. During the February 10 FPERC meeting, model year 2010 vehicles were added to the proposed Special Coverage, raising the number of vehicles covered from approximately 742,000 to 912,000.

Through February 2014, the FPE investigator continued to analyze and refine warranty data by month of build. The presentation to the FPERC on February 17 included warranty data shown both by month of build and months in service over a 24-month period. On February 18, 2014, the investigator made a similar presentation to the EFADC.

On March 10 and 11, 2014, the investigator presented again to the FPERC and the EFADC, this time including other manufacturer information regarding customer satisfaction and warranty coverage and recalls related to airbag connector issues. As of these meetings, the proposed field action was a Customer Satisfaction Program covering 2010-13 model year vehicles.

On March 13, 2014, the EFADC recommended a Customer Satisfaction Program for 2010-13 Saturn Outlook, Buick Enclave, GMC Acadia, and Chevrolet Traverse vehicles.

On March 14, 2014, GM contacted NHTSA regarding the proposed Customer Satisfaction Program. The same day, following the call with NHTSA, the EFADC met via telephone and made a determination to issue a Safety Recall instead of a Customer Satisfaction Program.

On March 16, 2014, EFADC members held multiple telephonic meetings to determine the scope of the proposed Safety Recall. The FPE investigator made a presentation to the EFADC that included discussion of vehicles previously covered by the February 3 and March 14, 2011 Customer Satisfaction and Special Coverage Bulletins. The population previously proposed for coverage, model years 2010-13, was expanded to include 2008-09 vehicles that were not repaired as part of the previous Customer Satisfaction or Special Coverage Programs. Vehicles from mid-to late-2013 were also included. The proposed Safety Recall, therefore, covered certain vehicles from 2008 through 2013, for a total of approximately 1.18 million vehicles.

On March 17, 2014, GM issued a Safety Recall for certain Buick Enclave, GMC Acadia, Chevrolet Traverse, and Saturn Outlook vehicles. GM's Safety Recall letter instructs dealers to remove driver and passenger SIAB connectors and splice and solder the wires together. *See* GM N140030 573 Letter dated March 17, 2014.

⁵ Initially, the presentation indicated that shorting bar damage could also be a root cause of the condition. The shorting bar issue was ruled out as a root cause in February 2014 based on information from GM's plant, as well as information from a November 2010 JST report.

EXHIBIT M



GENERAL MOTORS LLC
Vehicle Safety and Crashworthiness

- AA Pg 9

RECEIVED

By Recall Management Division at 3:32 pm, Mar 31, 2014

March 31, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a safety defect involving the following vehicles if equipped with Electric Power Steering (EPS):

Chevrolet Malibu: All model year (MY) 2004 - 2005, and some MY 2006 and MY 2008 - 2009 vehicles
Chevrolet Malibu Maxx: All model year (MY) 2004 - 2005, and some MY 2006
Chevrolet HHR (Non-Turbo): Some MY 2009 - 2010 vehicles
Chevrolet Cobalt: Some MY 2010 vehicles
Saturn Aura: Some MY 2008 - 2009 vehicles
Saturn ION: All MY 2004 - 2007 vehicles
Pontiac G6: All MY 2005, and some MY 2006 and MY 2008 - 2009 vehicles
Service parts installed into vehicles under Safety Recall 10023 (10V-073) prior to May 31, 2010

Vehicles that were included in Safety Recall 10023 (10V-073), are not included unless they were repaired prior to May 31, 2010. Vehicles that were repaired under special coverage bulletin numbers 10183 and 10187 are not included. Vehicles that were repaired with parts without defective components are not included in this recall.

573.6(c)(1): General Motors Company; Chevrolet, Pontiac and Saturn Brands.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect, which relates to motor vehicle safety, exists in the vehicles identified above. The subject vehicles equipped with electric power steering (EPS) may experience a sudden loss of power steering assist that could occur at any time while driving. If the power steering assist is lost, a message is displayed on the Driver Information Center and a chime sounds to inform the driver. Steering control can be maintained, as the vehicle will revert to a manual steering mode, but would require greater driver effort at low vehicle speeds, which could result in an increased risk of a crash.



573.6(c)(6): The issue was presented to the Field Performance Evaluation Review Committee and on March 27, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall. General Motors will be submitting a supplemental chronology within two weeks.

573.6(c)(8): GM will be releasing four bulletins due to different dealer repairs.

Bulletin number 14115:

Model and Model Years: 2004-2007 Saturn ION vehicles
2009-2010 HHR (non-turbo)
2010 Chevrolet Cobalt
Service Parts

Dealers are to replace the power steering motor.

Bulletin number 14116:

Model and Model Years: 2004-2006 Chevrolet Malibu/Malibu Maxx
2005-2006 Pontiac G6
2008-2009 Chevrolet Malibu, Pontiac G6 and Saturn Aura
built from 3-1-08 thru 6-27-08

Dealers are to replace the torque sensor assembly.

Bulletin number 14117:

Model and Model Years: 2008 Chevrolet Malibu, Pontiac G6 and Saturn Aura built from
2-1-08 thru 2-28-08

Dealers are to replace the torque sensor assembly and power steering motor controller unit.

Bulletin number 14118:

Model and Model Years: 2008 Chevrolet Malibu, Pontiac G6 and Saturn Aura built from
10-1-07 thru 1-31-08

Dealers are to replace power steering motor controller unit.

GM plans to issue preliminary notification about the recall to dealers the week of March 31, 2014, and a first owner letter the week of April 28, 2014. A second owner letter will be mailed and the formal dealer bulletin and special coverage bulletin will be provided when parts are available.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): GM will provide copies of the dealer and customer communications, including the owner letter, under separate cover.

573.6(c)(11): GM's assigned recall number is N140115. Assigned bulletin numbers are 14115, 14116, 14117 and 14118.

A special coverage (GM bulletin number 14119) will be implemented for MY 2006-2008 and early production of 2009 Chevrolet HHR (non-turbo) and MY 2003 Saturn ION to provide EPS Motor replacement for the life of the vehicle.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with a large, stylized initial "M" and "B".

M. Carmen Benavides, Director
Product Investigations and Safety Regulations

N140115
Attachment

573.6(c)(2),(3),(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	Z-Car	2004	96,607	05/16/2003	06/11/2004	Malibu	*
Chevrolet	Z-Car	2005	150,514	03/30/2004	07/29/2005	Malibu	"
Chevrolet	Z-Car	2006	93,690	05/26/2005	03/31/2006	Malibu	"
Chevrolet	Z-Car	2004	35,761	06/25/2003	06/11/2004	Malibu Maxx	"
Chevrolet	Z-Car	2005	43,317	03/31/2004	07/29/2005	Malibu Maxx	"
Chevrolet	Z-Car	2006	21,001	05/24/2005	03/31/2006	Malibu Maxx	"
Chevrolet	Z-Car	2008	90,481	10/01/2007	06/27/2008	Malibu	"
Chevrolet	Z-Car	2009	3,258	04/22/2008	06/27/2008	Malibu	"
Chevrolet	A-Car	2010	43,194	02/26/2010	06/23/2010	Cobalt	"
Chevrolet	A	2009	77,397	07/03/2008	06/18/2009	HHR (non-turbo)	"
Chevrolet	A	2010	49,641	04/20/2009	03/31/2010	HHR (non-turbo)	"
Pontiac	Z-Car	2005	54,552	05/26/2004	04/01/2005	G6	"
Pontiac	Z-Car	2006	116,761	01/11/2005	03/31/2006	G6	"
Pontiac	Z-Car	2008	49,740	10/01/2007	06/13/2008	G6	"
Pontiac	Z-Car	2009	1,221	04/16/2008	06/27/2008	G6	"
Saturn	Z-Car	2008	17,511	10/02/2007	06/27/2008	Aura	"
Saturn	Z-Car	2009	72	04/22/2008	06/28/2008	Aura	"
Saturn	A-Car	2004	113,390	04/29/2003	08/07/2004	ION	"
Saturn	A-Car	2005	63,992	04/27/2004	06/06/2005	ION	"
Saturn	A-Car	2006	81,153	04/13/2005	05/05/2006	ION	"
Saturn	A-Car	2007	76,193	04/05/2006	03/28/2007	ION	"
	**Service Parts:		61,001				
	GM Vehicle Total:		1,279,446				
	GM Grand Total:		1,340,447				

* All involved vehicles will be corrected as necessary.

** Service parts include parts that were installed in MY 2005-2010 Chevrolet Cobalt and MY 2007-2009 Pontiac G5 vehicles repaired under recall 10023 (10V-073) with a repair date prior to May 31, 2010

Letter to Ms. Nancy Lewis
N140115 573 Letter
March 31, 2014
Page 5

573.6(c)(2)(iv):

Cobalt, ION and HHR - column and motor:
JTEKT North America Inc.,
47771 Halyard Drive
Plymouth, MI. 48170
(734) 454-4423
Manufactured in the US.

Column electric power steering assembly:
Nexteer (formerly Delphi Saginaw Steering)
3900 E. Holland Rd.
Saginaw, MI 48601-9494
(989) 757-5000
Manufactured in the US.

The components listed below were used in the Nexteer column assembly.

2004 Malibu/Malibu Maxx - torque sensor:
American Furukawa, Inc. (AFI)
47677 Galleon Drive, Plymouth, MI 48170 U.S.A.
(734) 446-2200
Manufactured in Japan.

2004-2006 Malibu/Malibu Maxx, 2005-2006 G6, 2008-2009 Malibu, G6, Aura - torque sensor:
BI Technologies Corporation
4200 Bonita Place
Fullerton, CA 92835-1053
Phone: General Inquiry - (714) 447-2300
Customer Service - (714) 447-2345
Fax - (714) 447-2400
Manufactured in Mexico.

2008 Malibu, G6, Aura - resistor:
Yageo America
2665 North First Street, Suite 212
San Jose, CA 95134 USA
Phone: (408) 240 6200
Fax: (408) 240 6201
Manufactured in Taiwan.

EXHIBIT N



GENERAL MOTORS LLC
Global Vehicle Safety

(3 pages)

RECEIVED

By Recall Management Division at 6:04 am, Apr 30, 2014

April 29, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall for 2007 and some 2008 model year Saturn AURA vehicles.

573.6(c)(1): General Motors Company; Saturn Brand

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2007 and some 2008 model year Saturn AURA vehicles equipped with a 4-speed automatic transmission (ME7/MN5). These vehicles have a condition in which the transmission shift cable may fracture at any time. When the fracture occurs, the driver may not be able to select a different gear, remove the key from the ignition or place the transmission in park. If the driver cannot place the vehicle in park, and exits the vehicle without applying the park brake, the vehicle could roll away and a crash could occur without prior warning.

573.6(c)(6): The issue was presented to the Field Performance Evaluation Review Committee on April 21, 2014, and on April 22, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall. General Motors will be submitting a supplemental chronology within two weeks.

573.6(c)(8): Dealers are to install a shift cable assembly and mounting bracket.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.



Letter to Ms. Nancy Lewis

- AA Pg 103 of 168

N140152 573 Letter

April 29, 2014

Page 2

573.6(c)(11): General Motors' assigned recall number is 14152.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carmen Benavides". The signature is fluid and cursive, with a large, stylized initial "M" and "C".

M. Carmen Benavides, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2),(3),(4)

**VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE**

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Saturn	J	2007	40,249	04/24/2006	06/27/2007	AURA	*
Saturn	J	2008	15,965	04/24/2007	10/31/2007	AURA	"
GM Total:			56,214				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Leggett & Platt Automotive
 Post Office Box 757
 1 Leggett Road
 Carthage, Missouri 64836
 417-358-8131

The cables were manufactured in Mexico.

14152

EXHIBIT O

RECEIVED

By Recall Management Division at 4:40 pm, May 22, 2014

May 22, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-224

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 13, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall for 2007 and some 2008 model year (MY) Saturn AURA vehicles. General Motors is expanding this recall to include 2004 – 2008 MY Chevrolet Malibu (GMX380) and 2005 – 2008 MY Pontiac G6 with 4-speed transmissions (MN5); except for vehicles already repaired under safety recall 12106 12V-460 with labor code V2671 or V2672. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(1), 573.6(c)(2)(3)(4), 573.6(c)(6) and 573.6(c)(8) below supersedes information included in General Motors' letter of May 13, 2014.

573.6(c)(1): General Motors Company; Chevrolet, Pontiac and Saturn Brands

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2004 – 2008 MY Chevrolet Malibu (GMX380) and 2005 – 2008 MY Pontiac G6 with 4-speed transmissions (MN5); except for vehicles already repaired under safety recall 12106 12V-460 with labor code V2671 or V2672 and 2007 and some 2008 MY Saturn AURA vehicles equipped with a 4-speed automatic transmission (ME7/MN5). These vehicles have a condition in which the transmission shift cable may fracture at any time. When the fracture occurs, the driver may not be able to select a different gear or place the transmission in park. If the driver cannot place the vehicle in park, and exits the vehicle without applying the park brake, the vehicle could roll away and a crash could occur without prior warning.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.

On May 20, 2011, NHTSA sent an opening resume to notify GM that it had opened an investigation into 2007 model year (MY) Saturn Aura vehicles related to alleged failure of the transmission shift cable resulting in unintended movement of the vehicle. On July 7, 2011, NHTSA opened preliminary evaluation PE11-021.

GM provided responses to PE11-021 on August 19, 2011, August 26, 2011, and September 2, 2011. GM found a cable failure mode in which a tear to the conduit jacket could allow moisture to corrode the interior steel wires, resulting in degradation of shift cable performance, and eventually, a possible shift cable failure.

The summary of findings was presented to the Field Performance Evaluation Review Committee on October 21, 2011, and on November 16, 2011, the Executive Field Action Decision Committee decided to conduct a special coverage field action for the 2007-2008 MY Saturn Aura vehicles equipped with 4 speed transmissions and built with Leggett & Platt shift cables. Leggett & Platt shift cables were used in production of vehicles through approximately October 31, 2007. Kongsberg Automotive became the production supplier of shift cables beginning about November 1, 2007.

During the PE investigation, GM informed the NHTSA that the same or similar Leggett & Platt cables were used on certain Saturn Aura vehicles, Pontiac G6 and Chevrolet Malibu (GMX380) vehicles. On March 15, 2012, NHTSA sent an Engineering Assessment (EA11-015) request to investigate allegations of failure of the transmission shift cable on certain 2007-2008 MY Saturn Aura, Pontiac G6 and Chevrolet Malibu vehicles. GM provided a response to this EA on May 4, 2012.

During the investigation in response to EA11-015 regarding the MY 2007-2008 Saturn Aura vehicles, 2007-2008 MY Pontiac G6 and 2007-2008 MY Chevrolet Malibu vehicles, GM noticed elevated warranty rates in vehicles built with Kongsberg shift cables. On these vehicles, the tabs on the transmission shift cable end may fracture and separate without warning, resulting in failure of the transmission shift cable and possible unintended vehicle movement.

The issue was presented to the Field Performance Evaluation Review Committee on September 7, 2012, and on September 13, 2012, the Executive Field Action Decision Committee decided to conduct a safety recall.

The safety recall included all 2008-2010 MY Saturn Aura, Pontiac G6 and Chevrolet Malibu (GMX386 style only) vehicles with 4-speed transmissions (ME7 & MN5) built with Kongsberg shifter cables.

Also included in the safety recall were 2007-2008 MY Saturn Aura, and 2005-2007 MY Pontiac G6 vehicles equipped with 4 speed transmissions (ME7 & ME5) built with Leggett and Platt shift cables which may have been serviced with a Kongsberg cable.

On March 7, 2013, NHTSA sent a second Engineering Assessment to investigate allegations of failure of the transmission shift cable on all 2007-2008 MY Saturn Aura, Chevrolet Malibu (GMX 380 & 386 styles) and Pontiac G6 vehicles. GM provided responses on April 29, 2013, and May 14, 2013.

In February 2014 and April 2014 GM conducted searches of the NHTSA Vehicle Owner Questionnaire (VOQ) database to update GM's information on complaints associated with the transmission shift cable failure on the subject vehicles.

In April 2014 GM also conducted a search for warranty claims and other GM records indicating shift cable failure on the subject vehicles. The data indicated that some vehicle owners were experiencing cable failures after 120,000 miles, outside of the special coverage limitations for the Saturn Aura. The data also indicated some Saturn Aura owners may have been unaware of the special coverage on shift cables for their vehicles. On April 11, 2014, GM and NHTSA had a conference call to discuss the Saturn Aura shift cable failures.

The data update was presented to the Field Performance Evaluation Review Committee on April 21, 2014, and on April 22, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall of the Saturn Aura with 4-speed transmissions (ME7/MN5).

From April 22, 2014, to May 9, 2014, GM continued to study the data for the Malibu GMX380 and the G6 4-speed transmission vehicles. The data appeared to indicate the same cable failure mode found with the Saturn Aura 4-speed transmission, although the failure rate is much lower.

The Malibu GMX380 and the G6 4-speed transmission data analysis was presented to the Field Performance Evaluation Review Committee on May 12, 2014, and on May 19, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to inspect the shift cable assembly, and install a shift cable clamshell, or replace the shift cable with a new cable kit and new bracket if necessary.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, GM will provide reimbursement to owners according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14152.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2),(3),(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Saturn	Z	2007	40,228	04/24/2006	06/27/2007	AURA	*
Saturn	Z	2008	15,953	04/24/2007	10/31/2007	AURA	"
Total:			56,181 – (33 vehicles included in GM's letter dated May 13, 2014, were confirmed to have been repaired under warranty.)				

Additional Population

Chevrolet	Z	2004	96,607	05/16/2003	06/11/2004	Malibu	"
Chevrolet	Z	2004	35,761	06/25/2003	06/11/2004	Malibu Maxx	"
Chevrolet	Z	2005	163,824	03/30/2004	07/29/2005	Malibu	"
Chevrolet	Z	2005	48,581	03/30/2004	07/29/2005	Malibu Maxx	"
Chevrolet	Z	2006	141,688	05/26/2005	06/09/2006	Malibu	"
Chevrolet	Z	2006	29,795	05/26/2005	06/09/2006	Malibu Maxx	"
Chevrolet	Z	2007	113,982	04/03/2006	06/27/2007	Malibu	"
Chevrolet	Z	2007	12,149	04/04/2006	04/05/2007	Malibu Maxx	"
Chevrolet	Z	2008	29,225	05/15/2007	10/05/2007	Malibu	"
Pontiac	Z	2005	62,458	05/26/2004	04/01/2005	G6	"
Pontiac	Z	2006	152,857	01/11/2005	06/06/2006	G6	"
Pontiac	Z	2007	146,988	03/27/2006	06/22/2007	G6	"
Pontiac	Z	2008	41,017	04/11/2007	09/28/2007	G6	"
GM Total:			1,131,113				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Leggett & Platt Automotive
 Post Office Box 757
 1 Leggett Road
 Carthage, Missouri 64836
 417-358-8131

Kongsberg Automotive
 27275 Haggerty Road Suite 610
 Novi, MI 48377
 248-468-1264

The cables were manufactured in Mexico.

The cables were manufactured in Mexico.

EXHIBIT P



GENERAL MOTORS LLC
Global Vehicle Safety

14V-251
(3 pages)
Supplemental

RECEIVED

By Recall Management Division at 10:12 am, May 29, 2014

May 28, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-251

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 14, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors of a safety defect for 2005-2007 Chevrolet Corvette vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of May 14, 2014.

573.6(c)(1): Chevrolet Brand of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in model year 2005-2007 Chevrolet Corvette vehicles. On these vehicles, when the engine is warm, the underhood bussed electrical center (UBEC) housing will expand, causing the headlamp low-beam relay control circuit routed wire to bend slightly. After the wire is repeatedly bent, it can fracture and separate. When this occurs, the low-beam headlamps will not illuminate. As the UBEC housing cools and contracts, the low-beam headlamp function may return. This condition does not affect the high-beam headlamps, marker lamps, turn signals, daytime running lamps or fog lamps. Loss of low beam headlamps when they are required could reduce the driver's visibility, increasing the risk of a crash.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.

On May 6, 2013, NHTSA opened a Preliminary Evaluation (PE13-013) to investigate allegations of simultaneous loss of both low beam headlights without warning while operating model year (MY) 2005-2007 Chevrolet Corvette vehicles. The subject components of the Preliminary Evaluation included the low beam headlights and all associated components, including but not limited to switches, fuses and fuse box, and wiring and connectors. At the time of the Preliminary Evaluation (PE13-013) NHTSA had 30 reports from consumers alleging loss of both low beam headlights while driving at night



without warning. Some complainants reported that the problem is intermittent and some reported that low beam headlight functionality returns after a period of time, typically after the vehicle has been parked. The high beam headlights and fog lights remain operational. On May 24, 2013, GM and NHTSA had a discussion and agreed on the scope of the component as the underhood bussed electrical center (UBEC).

On June 27, 2013, GM responded to the Preliminary Evaluation (PE13-013).

On August 23, 2013, NHSTA upgraded Preliminary Evaluation (PE13-013) to an Engineering Analysis (EA13-007). The Engineering Analysis expanded the vehicle scope to include MY 2005-2013 Chevrolet Corvette. On January 7, 2014, NHTSA provided VOQs related to customer complaints of loss of low beam headlamps.

On January 14, 2014, GM responded to the Engineering Analysis (EA13-007). On January 23, February 14 and February 27, 2014, GM and NHTSA had discussions regarding the Corvette vehicle warranty to date. GM provided statistical projections using extended warranty, as well as the analysis methodology.

On May 1, 2014, GM updated its review of warranty data and other records that would have been new since the previous Engineering Analysis data request. Additionally, on May 2, 2014, NHTSA provided additional VOQs received since January. GM analyzed the data received by model year for the subject vehicles.

The issue was presented to the Field Performance Evaluation Review Committee on May 5, 2014, and on May 7, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall for MY 2005- 2007 Chevrolet Corvette vehicles and a Customer Satisfaction campaign for MY 2008-2013 Chevrolet Corvette vehicles.

573.6(c)(8): Dealers are to replace the UBEC.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 13146.

General Motors will release a customer satisfaction bulletin for model year 2008-2013 Chevrolet Corvette vehicles under program number 14203.

Sincerely,



Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	Y	2005	33,813	03/29/2004	09/08/2005	Corvette	*
Chevrolet	Y	2006	31,596	03/22/2005	06/26/2006	Corvette	"
Chevrolet	Y	2007	37,749	02/28/2006	06/22/2007	Corvette	"
GM Total:			103,158				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Delphi
5725 Delphi Drive
Troy, MI 48098-2815
Gary R. Greib
Manager, Product Investigations / Patent Agent
Delphi Legal Staff
Office Phone: 248-813-3362
Cell Phone: 248-953-8579
gary.r.greib@delphi.com

The UBEC is manufactured in Mexico.

EXHIBIT Q



GENERAL MOTORS LLC
Global Vehicle Safety

14V-252
(6 pages)
Supplemental

RECEIVED

By Recall Management Division at 10:08 am, May 29, 2014

May 28, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-252

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 14, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving model year (MY) 2004-2012 Chevrolet Malibu, MY 2004-2007 Malibu Maxx, MY 2005-2010 Pontiac G6 and MY 2007-2010 Saturn Aura vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) below supersedes information included in General Motors' letter of May 14, 2014.

573.6(c)(1): Chevrolet, Pontiac and Saturn Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2004-2012 Malibu, 2004-07 Malibu Maxx, 2005-10 Pontiac G6, 2007-10 Saturn Aura vehicles. On these vehicles, over time an increased resistance can develop in the Body Control Module (BCM) connection system and result in voltage fluctuations or intermittency in the Brake Apply Sensor (BAS) circuit that can cause service brake lamp malfunction. As a result, the service brake lamps may illuminate when the service brakes are not being applied, or may not illuminate when the service brakes are being applied. Additionally, cruise control may not engage. If cruise control is engaged, additional service brake pedal travel may be required to disengage it. Service brake pedal application may not be required to move the shift lever out of PARK, or additional service brake pedal travel may be required to move the shift lever out of PARK. Traction control, electronic stability control, and panic braking assist features, if equipped, may be disabled. Service ESC and/or Traction Control tell-tales may illuminate with this condition. These conditions may increase the risk of a crash.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.



On September 15, 2008, NHTSA opened an investigation (Preliminary Evaluation) PE08-054 for model year (MY) 2005-2007 Pontiac G6 vehicles involving allegations that the stop lamps may turn on without depressing the brake pedal and also may turn off when the brake pedal is depressed.

GM responded to the questions related to PE08-054 on November 12, 2008.

During the investigation and analysis of the alleged defect in PE08-054, the Pontiac G6 warranty data indicated an elevated rate for vehicles built in the month of January 2005, which included MY 2005 and 2006. Further investigation showed that fretting corrosion in the BCM C2 connector was the root cause. GM and its supplier Delphi developed and confirmed the application of dielectric grease to the BCM C2 connector as an effective countermeasure to the fretting corrosion.

In November 2008, Inteva, the instrument panel cockpit supplier, began application of dielectric grease to the BCM C2 connector for the Pontiac G6, Chevrolet Malibu, and Saturn Aura vehicles. On December 4, 2008, GM issued Technical Service Bulletin (TSB) #08-05-22-009 regarding the application of dielectric grease to the BCM C2 connector for the MY 2005-2009 Pontiac G6, 2004-2007 Chevrolet Malibu/Malibu Maxx and 2008 Chevrolet Malibu Classic and 2007-2009 Saturn Aura vehicles.

The result of the analysis was presented to the Field Performance Evaluation Review Committee on January 16, 2009, and on January 22, 2009, the Executive Field Action Decision Committee decided to conduct safety recall 08317 (09V-036) for MY 2005 and MY 2006 Pontiac G6 vehicles built during the month of January, 2005.

On January 28, 2009, GM notified NHTSA and Transport Canada (TC) of the safety recall (safety campaign 08317) for the Pontiac G6 vehicles built in January 2005 for the US and Canada.

On January 30, 2009, NHTSA closed investigation PE08-054.

In October 2010, GM released an updated Technical Service Bulletin (TSB) 08-05-22-009C regarding intermittent brake lamp malfunctions. (TSB) 08-05-22-009C was issued to add MY 2008-2009 Chevrolet Malibu/Malibu Maxx vehicles.

On September 9, 2011, GM received an Information Request (IR) (3284-2011-0286) from Transport Canada (TC) regarding complaints from owners of vehicles outside of the safety campaign 08317. The IR requested GM of Canada to provide the population and brake lamp related claim information for all vehicles that use the same BCM C2 connector that was the subject of GM TSB #08-05-22-009C.

On October 21, 2011, GM of Canada responded to the questions related to TC IR 3284-2011-0286.

In June 2012, NHTSA provided additional complaints (VOQs) that were outside of the build dates for the brake lamp malfunctions on the Pontiac G6. In July 2012, GM and NHTSA reviewed Pontiac G6 warranty data that showed the rate of brake lamp malfunction of the vehicles built in other months remained lower than those that had been included in safety recall 08317 (09V-036).

On February 04, 2013, NHTSA opened Recall Query RQ13-001 regarding 324 complaints alleging that the brake lights do not operate properly on model year (MY) 2005-2009 Pontiac G6, 2004-2011 Malibu, and 2007-2010 Aura vehicles not included in safety recall 08317 (09V-036).

GM submitted responses to NHTSA's questions related to Recall Query RQ13-001 on March 28, 2013, April 17, 2013 and a supplement on May 17, 2013.

After the submission of the response to NHTSA, GM continued to analyze complaints and warranty claim data. GM investigated these occurrences looking for root causes that could be additional contributors to the previously identified fretting corrosion. GM's analysis at that time continued to point to fretting corrosion in the BCM C2 connector as the root cause.

On May 15, 2013, Transport Canada requested GM of Canada to provide an update of the number of all complaints, warranty claims, legal actions and techline calls with regards to the brake light failures identified in TSB# 08-05-22-009C or recall TC# 2009-023; specifically: 2005-2009 Pontiac G6, 2004-2012 Chevrolet Malibu and 2007-2010 Saturn Aura. On June 17, 2013, Transport Canada assigned their investigation number 3280-13-11 to the issue and posted the investigation to the Transport Canada web site.

On June 19, 2013, GM of Canada responded to Transport Canada's request.

On June 6, 2013, NHTSA sent GM a resume upgrading Recall Query RQ13-001 to an Engineering Analysis EA13-005.

In August 2013, as part of the ongoing investigation, additional warranty analyses indicated an elevated warranty rate for the vehicles that were built after GM began the dielectric grease application in the assembly plants in November 2008. GM reviewed the dielectric grease application process in the assembly plants, the service procedure, and continued to investigate potential additional root causes. GM also started the collection of BCM modules through the warranty returns parts center to check for the proper application of the dielectric grease.

In November 2013 GM concluded that the amount of dielectric grease applied in the assembly plant starting November 2008 was insufficient based on the warranty return parts of the BCM modules.

On November 14, 2013, NHTSA provided the questions for Engineering Analysis EA13-005. EA13-005 included all MY 2005-2010 Pontiac G6, MY 2004-2011 Chevrolet Malibu, and MY 2007-2009 Saturn Aura vehicles and added the following additional allegations: A) the brake lamps remaining illuminated at all times (including when the service brakes are not being applied) and/or failing to illuminate when the service brakes are applied; B) difficulty shifting out of PARK; C) the inability to engage the cruise control; D) the ability to move the gear shift out of PARK without the service brake applied (which may result in a roll-away event); and, E) in suitably equipped vehicles, i) the electronic stability control (ESC) does not engage and/or the ESC light illuminates, ii) the traction control does not engage and/or the traction control light illuminates, and/or, iii) disabling or otherwise affecting the performance of the panic brake-assist feature.

As part of the data analysis for this EA response, GM continued to search for additional indicators in the warranty data of fretting corrosion in the BCM C2 connector. GM also

further investigated the effect on vehicle performance of the additional alleged defects defined in the EA inquiry. GM responded to the questions for EA13-005 on December 18, 2013, January 24, 2014 and January 31, 2014.

Between December 6, 2013 and March 21, 2014, GM of Canada and Transport Canada continued to discuss the potential root causes for the subject brake lamp and associated conditions and to discuss GM's progress toward isolating the root cause(s) and an appropriate solution.

GM continued to study additional root causes of fretting corrosion and additional engineering and service improvements to eliminate fretting corrosion. In March 2014 GM engineering teams began conducting analysis and physical testing to measure the effectiveness of potential countermeasures to address fretting corrosion. As a result, GM determined that additional remedies were needed to address the fretting corrosion.

The issue was presented to the Field Performance Evaluation Review Committee on May 5, 2014, and on May 7, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to attach the wiring harness to the BCM with a spacer, apply dielectric lubricant to both the BCM C2 and harness connector and on the BAS and harness connector, and relearn the brake pedal home position.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, General Motors will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 13036.

Sincerely,



Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
 PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	Z	2004	96,607	05/16/2003	06/11/2004	Malibu	*
Chevrolet	Z	2004	35,761	06/25/2003	06/11/2004	Malibu Maxx	"
Chevrolet	Z	2005	163,824	03/30/2004	07/29/2005	Malibu	"
Chevrolet	Z	2005	48,581	03/30/2003	07/29/2005	Malibu Maxx	"
Chevrolet	Z	2006	141,688	05/26/2005	06/09/2006	Malibu	"
Chevrolet	Z	2006	35,585	01/26/2005	06/09/2006	Malibu Maxx	"
Chevrolet	Z	2007	113,983	04/03/2006	06/27/2007	Malibu	"
Chevrolet	Z	2007	13,774	04/04/2006	04/05/2007	Malibu Maxx	"
Chevrolet	Z	2008	155,564	05/15/2007	06/27/2008	Malibu	"
Chevrolet	Z	2009	176,837	04/22/2008	06/23/2009	Malibu	"
Chevrolet	Z	2010	183,814	04/07/2009	06/15/2010	Malibu	"
Chevrolet	Z	2011	211,185	04/08/2010	06/09/2011	Malibu	"
Chevrolet	Z	2012	225,863	04/19/2011	10/11/2012	Malibu	"
Pontiac	Z	2005	62,481	05/26/2004	04/01/2005	G6	"
Pontiac	Z	2006	170,412	01/11/2005	06/06/2006	G6	"
Pontiac	Z	2007	164,340	03/27/2006	06/22/2007	G6	"
Pontiac	Z	2008	154,349	04/11/2007	06/13/2008	G6	"
Pontiac	Z	2009	99,228	04/16/2008	06/12/2009	G6	"
Pontiac	Z	2010	25,586	04/23/2009	01/04/2010	G6	"
Saturn	Z	2007	64,852	04/24/2006	06/27/2007	Aura	"
Saturn	Z	2008	60,717	04/24/2007	06/27/2008	Aura	"
Saturn	Z	2009	35,473	04/22/2008	05/18/2009	Aura	"
Saturn	Z	2010	20	04/07/2009	05/26/2009	Aura	"
GM Total:			2,440,524				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Delphi
5725 Delphi Drive
Troy, MI 48098-2815
Gary R. Greib
Manager, Product Investigations / Patent Agent
Delphi Legal Staff
Office Phone: 248-813-3362
Cell Phone: 248-953-8579
gary.r.greib@delphi.com

The BCM, BCM connector and BAS connector are manufactured in Mexico.

Dalian Alps Electric Co. Ltd.
No. 6 Han Zheng Road
Jinzhou District
Dalian, 116100
Phone #: 86 411 767 5102

The BAS is manufactured in China.

13036

EXHIBIT R



GENERAL MOTORS LLC
Global Vehicle Safety

14V-266

4 PAGES

SUPPLEMENTAL

May 30, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-266

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 19, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2009-2014 model year Buick Enclave, Chevrolet Traverse, GMC Acadia and 2009-2010 model year Saturn Outlook model vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(6) and 573.6(c)(8) below supersedes information included in General Motors' letter of May 19, 2014.

573.6(c)(1): Buick, Chevrolet, GMC and Saturn Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect, which relates to motor vehicle safety, exists in 2009-2014 model year Buick Enclave, Chevrolet Traverse, GMC Acadia and 2009-2010 model year Saturn Outlook vehicles. The flexible steel cable that connects the safety belt to the vehicle at the outside of the front outboard seating positions can fatigue and separate over time as a result of occupant movement into the seat. In a crash, a separated cable could increase the risk of injury to the occupant.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.

On February 10, 2012, Thomas Pontiac (Cobourg, Ontario) reported a customer vehicle with a 2010 GMC Acadia whose seat belt buckle separated from the anchor at the attaching cable. A Dealer Product Investigation Report (PIR) was issued.

On February 17, 2012, Engineering, Product Investigations, and the Brand Quality Manager (BQM) were notified of the PIR by GM Canada.

On February 20, 2012, GM notified the supplier (Autoliv), Interior Quality Reliability Durability (QRD), and Validation of the incident.



On March 2, 2012, GM engineers inspected vehicles from durability testing at GM's Milford Proving Grounds (MPG). No issues regarding the seat belt buckle and anchor at the attaching cable were found.

On March 7, 2012, Autoliv completed its analysis of the returned part and concluded the condition for that one occurrence was caused by fatigue of the cable. Engineering, the Safety Belts Global Sub-System Leadership Team (GSSLT), and Product Investigations were notified of the supplier analysis results the next day.

On April 20, 2012, another part exhibiting the condition was returned from a dealership. Engineering and Product Investigations were notified.

Prior to April 30, 2012, a warranty analysis was completed that turned up three additional occurrences (verbatim) that described similar complaints. On April 30, 2012, a meeting was held with Engineering, Autoliv, and Product Investigations to review sample parts and results of the warranty analysis.

On June 4, 2012, a meeting was held with Engineering, Autoliv, Product Investigations, and the Safety Belts GSSLT at which it was determined that a field review should be conducted.

On June 11, 2012, a field review of approximately 68 vehicles was completed. No cable damage was observed.

On June 21, 2012, a meeting was held with Engineering, Autoliv, Product Investigations, Validation, and the Brand Quality Manager (BQM) to review the existing sample parts and analysis.

On August 28, 2013, another part exhibiting the condition was returned from GM Canada Product Investigations.

In early October 2013, GM initiated sliding entry testing at MGA in an attempt to duplicate the condition on a sliding entry test.

On October 18, 2013, the condition was duplicated in the MGA sliding entry test. This sample had the sleeve in place, as originally designed. It was determined that, in some seat positions, the sleeve can present the buckle in a manner that can subject the cable to bending during customer entry into the vehicle. The condition was duplicated on a second sample in November, 2013.

On December 18, 2013, another part exhibiting the condition was returned from GM Canada Product Investigations.

On January 13, 2014, a sample, without a sleeve, completed 20,000 cycles without incident in the MGA laboratory.

On February 24, 2014, Engineering Work Order (EWO) 2025056 was approved to add radii to the ferrule on the cable of the buckle assembly. The condition seen in the field is attributed to fatigue of the cable and not to interaction with the ferrule.

On April 14, 2014, this activity was turned over to GM Product Investigations and assigned an investigation number.

On May 6, 2014, the issue was presented at the ISR Review Meeting and advanced to the Field Performance Evaluation Team (FPET). FPET reviewed the issue on May 8, 2014,

where it was moved forward to the Field Performance Evaluation Review Committee (FPERC). EWOs 2056932 and 2057107 were approved on May 8, 2014, and May 12, 2014 (respectively).

The issue was presented to the Field Performance Evaluation Review Committee on May 12, 2014, and on May 19, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall.

573.6(c)(8): Dealers are to inspect, and if necessary, repair or replace the lap pretensioner (without a sleeve).

General Motors sent the dealer bulletin on May 28, 2014, and will provide owner letter mail date when available.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14187.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Buick	R/V	2009	38,096	04/14/2008	06/19/2009	Enclave	*
Buick	R/V	2010	48,103	04/22/2009	06/04/2010	Enclave	"
Buick	R/V	2011	69,872	04/15/2010	06/24/2011	Enclave	"
Buick	R/V	2012	70,060	04/20/2011	10/04/2012	Enclave	"
Buick	R/V	2013	38,532	08/07/2012	05/30/2013	Enclave	"
Buick	R/V	2014	62,599	03/26/2013	05/14/2014	Enclave	"
Chevrolet	R/V	2009	74,594	06/06/2008	07/30/2009	Traverse	"
Chevrolet	R/V	2010	82,724	05/01/2009	06/04/2010	Traverse	"
Chevrolet	R/V	2011	128,826	04/15/2010	06/24/2011	Traverse	"
Chevrolet	R/V	2012	117,489	04/12/2011	10/04/2012	Traverse	"
Chevrolet	R/V	2013	62,899	08/06/2012	05/30/2013	Traverse	"
Chevrolet	R/V	2014	95,546	03/26/2013	05/14/2014	Traverse	"
GMC	R/V	2009	46,337	04/09/2008	06/19/2009	Acadia	"
GMC	R/V	2010	56,770	04/22/2009	06/04/2010	Acadia	"
GMC	R/V	2011	87,546	04/15/2010	06/24/2011	Acadia	"
GMC	R/V	2012	102,996	04/12/2011	10/04/2012	Acadia	"
GMC	R/V	2013	53,598	08/08/2012	05/30/2013	Acadia	"
GMC	R/V	2014	84,212	03/26/2013	05/14/2014	Acadia	"
Saturn	R/V	2009	14,920	04/14/2008	06/19/2009	Outlook	"
Saturn	R/V	2010	3,636	04/22/2009	03/18/2010	Outlook	"
GM Total:			1,339,355				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Autoliv Americas
 1320 Pacific Drive
 Auburn Hills, MI 48326
 248-475-9000
 The parts are manufactured in Mexico.

EXHIBIT S



GENERAL MOTORS LLC
Global Vehicle Safety

June 25, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-261

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 30, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2004 - 2008 model year Chevrolet Aveo vehicles. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(5) below supersedes information included in General Motors' letter of May 30, 2014.

573.6(c)(1): General Motors Company, Chevrolet Brand

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2004 - 2008 model year Chevrolet Aveo vehicles. A metal oxide semiconductor field effect transistor (MOSFET) within the DRL module, which is located under the instrument panel, may operate in an unintended state due to external cause. While in this state, if the over temperature protection circuit and heat sinking capability of the DRL module do not adequately protect the DRL module, the DRL module could melt and cause a fire.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.

In March of 2012 GM Korea (GMK) engaged GM North America (GMNA) Field Product Analysis Engineering to conduct an investigation on two Suzuki Forenza vehicles for interior fires. An on-site assesment was completed which had evidence of interior fires originating from the driver side instrument panel lower. The vehicle evidence indicated the origin of the heat source was the connection area of the wiring at the Daytime Running Lamp (DRL) module. DRL modules and wiring from the investigated vehicles were provided to GMK for analysis. The module and connector were melted and no additional conclusions were made.



In the months following, a field data analysis was conducted on the model year (MY) 2004-2009 Chevrolet Aveo (T200). A survey of TREAD data and legal records identified customer complaints recorded for vehicle thermal events, NHTSA Vehicle Owner Questionnaire's (VOQ), and detailed field claims had been reported. In September and November 2012 two detailed field claims for the 2006 model year that had property damage consistent with the Suzuki (J200) were provided to GMK to support the ongoing investigation. One field claim was information only, and one field claim involved a DRL module, wiring, and instrument panel parts returned for analysis. No conclusion was reached.

GMK led an ongoing investigation on the J200 & T200 for thermal issues related to DRL modules.

On May 9, 2014, GMK made an Executive Field Action Decision Committee decision to conduct a safety recall for the Suzuki Forenza (J200) vehicles in North America for DRL & Headlamp switch related vehicle fires.

On May 12, 2014, GMNA conducted a TREAD data and NHTSA VOQ search to identify thermal incidents related to DRL modules on the Chevrolet Aveo (T200). 13 customer claims and 2 VOQ's were identified that implied the DRL as the source of the issue.

The issue was presented to the Field Performance Evaluation Review Committee on May 13, 2014, and on May 16, 2014, the Executive Field Action Decision Committee decided to conduct a safety recall on the MY 2004-2008 Chevrolet Aveo.

573.6(c)(8): General Motors will provide its plan for remedying the defect and its schedule for notifying dealers and owners as soon as they are confirmed.

Pursuant to 577.11, General Motors will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14236.

Sincerely,



Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	T	2004	55,780	06/25/2003	12/13/2004	Aveo	*
Chevrolet	T	2005	63,378	07/02/2004	07/15/2005	Aveo	"
Chevrolet	T	2006	51,667	07/01/2005	05/11/2006	Aveo	"
Chevrolet	T	2007	24,722	05/02/2006	06/11/2007	Aveo	"
Chevrolet	T	2008	22,031	03/30/2007	05/07/2008	Aveo	"
GM Total:			217,578				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv):

The supplier of the DRL module is:
 Hamsar Diversco Inc.
 5320 Downey St.
 Burlington, Ontario Canada L7L 6M2

Canada is the country of origin for the DRL module.

14236

EXHIBIT T



GENERAL MOTORS LLC
Global Vehicle Safety

June 25, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Re: NHTSA Notification Campaign No. 14V-260

Dear Ms. Lewis:

This letter supersedes General Motors' letter of May 30, 2014, and is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2004 - 2007 model year Chevrolet Optra vehicles. These vehicles were sold primarily in some U.S. territories. Specifically, the information submitted pursuant to 49 CFR 573.6(c)(5) below supersedes information included in General Motors' letter of May 30, 2014.

573.6(c)(1): General Motors Company, Chevrolet Brand

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2004 - 2007 model year Chevrolet Optra vehicles. Heat generated within the headlamp switch, which is located on the left side of the steering column, can deform a plastic actuator within the switch intended to lift the headlamp switch contacts. As this actuator deforms, the headlamp switch contacts can close. If carbon has formed on the headlamp switch contacts, it could cause a resistive short and melt the switch, which could cause a fire.

In addition, a metal oxide semiconductor field effect transistor (MOSFET) within the DRL module, which is located under the instrument panel, may operate in an unintended state due to an external cause. While in this state, if the over temperature protection circuit and heat sinking capability of the DRL module do not adequately protect the DRL module, the DRL module could melt and cause a fire.

573.6(c)(6): As permitted by the provisions of 49 C.F.R. 573.6(b), and pursuant to the requirements of 49 C.F.R. 573.6(c)(6), General Motors now submits the chronology of principal events that were the basis for the determination that the defect related to motor vehicle safety.



In October 2010 GM Korea (GMK) was notified of thermal incidents from Suzuki on the Forenza/Reno model. GMK received a Daytime Running Lamp (DRL) module with wiring harness on April 13, 2011 and a second on July 25, 2011. GMK analyzed the returned parts and concluded the origin of the heat source was at the connection of the wiring harness to the DRL module. The returned parts had melted and a root cause was not identified.

On March 9, 2012, GMK engaged GM North America (GMNA) Field Product Analysis Engineering to conduct an investigation on two Suzuki Forenza vehicles for interior fires. An on-site assessment was completed which had evidence of interior fires originating from the driver side instrument panel lower area. The vehicle evidence indicated the origin of the heat source was the connection area of the wiring at the DRL module. DRL modules and wiring from the investigated vehicles were provided to GMK for analysis. The module and connector were melted and no additional conclusions were made.

On November 27, 2012, GMK was notified by Suzuki of 10 cases showing melting of the headlamp switch. On January 5, 2013, GMK received 5 melted returned headlamp switch parts from Suzuki and conducted an analysis with support of the headlamp switch supplier Shin Chang. A failure mode was not determined. GMK also reviewed two DRL modules that had experienced minor damage and conducted lab testing with support of the wiring supplier Packard Korea. Both modules showed a low beam "On" condition when properly functioning modules would be in the "Off" condition. A failure mode for this condition was not determined.

On April 17, 2013, GMK received 16 non-melted returned headlamp switch parts from Suzuki and conducted an analysis that indicated that 15 returned parts showed a normal function and 1 returned part showed a high beam circuit closed (stuck in the "On" position). The one failed part indicated that a high beam remained "On" when the ignition key was in the "Off" position.

On June 11, 2013, GMK and Suzuki discontinued the Suzuki led product quality meetings. GMK Aftersales team took over responsibility of current product quality management with support from GMK Engineering and GMK Quality.

On March 7, 2014, Suzuki notified GMK of additional cases and requested a field action review. Additional claims were identified on March 11, 2014, and on March 27, 2014. GMK and GMNA conducted an on-site investigation from April 2, 2014 through April 11, 2014. The investigation concluded that the fires and melting incidents in J200 vehicles were caused by a headlamp switch fault that results in driving high surface temperatures at the DRL module or headlamp switch. The issue was reviewed by the GMK Field Performance Evaluation Review Committee.

On May 9, 2014, an Executive Field Action Decision Committee decision was made to conduct a safety recall for the Suzuki Forenza/Reno and Chevrolet Optra (J200) vehicles in North America for DRL & Headlamp switch related vehicle fires.

573.6(c)(8): General Motors will provide its plan for remedying the defect and its schedule for notifying dealers and owners as soon as they are confirmed.

Pursuant to 577.11, General Motors will provide reimbursement to owners for repairs completed on or before ten days after the owner mailing is completed, according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14093.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	J	2004	17	09/27/2003	03/25/2004	Optra	*
Chevrolet	J	2005	7	08/18/2004	04/18/2005	Optra	"
Chevrolet	J	2006	1	01/18/2006	01/18/2006	Optra	"
Chevrolet	J	2007	188	09/21/2006	05/14/2007	Optra	"
GM Total:			213				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv):

The supplier of the headlamp switch is:
 Woochang
 16, Sinwon-ro 133 beon-gil,
 Danwon-gu, Ansan-si, Gyeonggi-do, KOREA

The supplier of the DRL module is:
 Hamsar Diversco Inc.
 5320 Downey St.
 Burlington, Ontario Canada L7L 6M2.

The country of origin for the headlamp switch is Korea, and for the DRL module, Canada.

14093

14V-260 – Populations updated 5-20-14

EXHIBIT U



GENERAL MOTORS LLC
Global Vehicle Safety

(3 pages)

RECEIVED

June 11, 2014

By Recall Management Division at 8:41 am, Jun 12, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2004-2011 model year Saab 9-3 Convertible vehicles.

573.6(c)(1): The vehicles subject to this defect notification were manufactured by Saab Automobile AB (Saab), which, at the time of manufacture, was a subsidiary of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in 2004-2011 model year Saab 9-3 Convertible vehicles. The automatic tensioning system cable in the driver's side front seat belt retractors may break, causing seat belt webbing spooled out by the user to not retract. If this occurs, it will become obvious to the seat occupant immediately. If a crash were to occur with a seat belt in this condition, the result could increase the injury to the driver.

573.6(c)(6): On February 11, 2014, an investigation was opened in response to NHTSA Vehicle Owner Questionnaires claiming issues with the driver side front seat belt retractor in Saab 9-3 convertibles. On April 17, 2014, a GM Product Investigation Engineer was assigned to work through the issue. On May 22, 2014, it was confirmed that the retractor for the 2005 model year (MY) Saab 9-3 convertible had the same retractor content as the 2004 MY convertible (unlike the retractor for the 2005 MY Saab 9-3 sedans, which had a design change from the 2004 MY sedans). GM was aware of 33 complaints for the 2004 model and none for the 2005 or later model year convertibles. The Saab 9-3 convertible had not been included in the April 2010 safety recall of the Saab 2004 MY sedan recall because (1) the warranty rate for the convertible was much lower than the sedan in 2010, and (2) the lower warranty rate for the convertible was attributed to the different design and application of the seat belt system between the convertible and the sedan.

The issue was presented during an Open Investigation Review (OIR) on June 2, 2014, and on June 4, 2014, the Safety and Field Action Decision Authority (SFADA) decided to conduct a safety recall.



573.6(c)(8): Dealers are to replace the driver side retractor.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin, owner letter and mail dates when available.

573.6(c)(11): General Motors' assigned recall number is 14222.

Special Coverage 10086, which was issued April 2010, and which covered repairs to replace the passenger side retractors on 2004 model year Saab 9-3 sedans, will be updated to (1) expand the coverage from 10 years from the new vehicle date of sale to the life of the vehicles for 2004 Saab 9-3 sedans, and (2) add, for the life of the vehicle, 2004 – 2011 model year Saab 9-3 convertibles, to cover the replacement of the passenger side retractor, if needed, as a result of this condition.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2),(3),(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Saab	9-3	2004	6,821	07/30/2003	07/09/2004	Convertible	*
Saab	9-3	2005	5,068	07/15/2004	07/01/2005	Convertible	"
Saab	9-3	2006	5,803	06/16/2005	07/11/2006	Convertible	"
Saab	9-3	2007	4,924	07/20/2006	11/01/2007	Convertible	"
Saab	9-3	2008	4,181	09/21/2007	11/19/2008	Convertible	"
Saab	9-3	2009	711	10/03/2008	03/29/2010	Convertible	"
Saab	9-3	2010	1,096	10/12/2009	09/27/2010	Convertible	"
Saab	9-3	2011	185	09/30/2010	02/15/2011	Convertible	"
GM Total:			28,789				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): The component part that will be replaced to remedy the defect is the retractor supplied by Takata.

TAKATA-PETRI AG
 Bahnweg 1
 63743 Aschaffenburg, Germany
 albrecht.plag@eu.takata.com

The parts were manufactured in Krzeszow, Poland.

EXHIBIT V



GENERAL MOTORS LLC
Global Vehicle Safety

(3 pages)

RECEIVED

By Recall Management Division at 3:47 pm, Jul 02, 2014

July 2, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall for certain 2006 model year (MY) Chevrolet Trailblazer EXT and GMC Envoy XL, 2006-07 MY Chevrolet Trailblazer; GMC Envoy; Buick Rainier; Isuzu Ascender; and 2005-07 MY SAAB 9-7x vehicles.

573.6(c)(1): General Motors Corporation was the manufacturer of vehicles which were sold under the following brands: Chevrolet, GMC, Buick, SAAB (distributed by SAAB Cars USA) and Isuzu (distributed by Isuzu Motors America, LLC,)

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety may exist in the following vehicles repaired under recall 12180 (12V-406 or 13V-248): 2006 model year Chevrolet Trailblazer EXT and 2006-2007 Chevrolet Trailblazer, GMC Envoy, Buick Rainier, SAAB 9-7x, and Isuzu Ascender vehicles. The service bulletin provided that if the driver's door module was functioning properly, a protective coating was to be applied. If the module was not working properly, it should be replaced. Vehicles that were repaired by having a protective coating applied to the driver's door module may continue to have a safety related defect.

If fluid, such as melted snow containing road salt, enters the driver's door module, it may cause corrosion that could result in a short in the circuit board. A short may cause the power door lock and power window switches to function intermittently or may stop working. A short may cause overheating, which could melt components of the door module, producing odor, smoke, or a fire. Additionally, the windows may raise or lower themselves, without user input. These conditions may occur even with the vehicle parked and the key removed. Customers should park the vehicle outdoors until it has been remedied.

573.6(c)(6): On April 29, 2014, GM's Product Assistance Center received a field report of the failure of a vehicle's driver's master power window switch that had been repaired with the protective coating as part of GM's 12180 (12V-406 or 13V-248) safety recall.



From April 30 to June 12, 2014, GM's Product Assistance Center received nine additional (9) reports of field failures of the driver's master power window switch after they had been repaired with the protective coating as part of GM's 12180 safety recall.

On May 9, 2014, GM opened a new internal investigation, to investigate this issue.

The issue was presented during an Open Investigation Review (OIR) on June 16, 2014, and on June 25, 2014, the Safety and Field Action Decision Authority (SFADA) decided to conduct a safety recall.

A stop delivery order was sent to dealers on July 2, 2014.

573.6(c)(8): Dealers are to inspect the part number of the door module and, if necessary, install a new door module.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide copies of the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14309.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2),(3),(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Buick	S/T	2006	6,894	06/01/2005	06/08/2006	Rainer	*
Buick	S/T	2007	3,097	04/04/2006	05/14/2007	Rainer	"
Chevrolet	S/T	2006	13,092	05/18/2005	02/20/2006	TrailBlazer EXT	"
Chevrolet	S/T	2006	59,008	05/13/2005	06/11/2006	TrailBlazer	"
Chevrolet	S/T	2007	45,358	04/04/2006	05/14/2007	TrailBlazer	"
GMC	S/T	2006	9,025	05/17/2005	02/20/2006	Envoy XL	"
GMC	S/T	2006	26,744	06/01/2005	06/11/2006	Envoy	"
GMC	S/T	2007	18,752	04/04/2006	05/14/2007	Envoy	"
SAAB	S/T	2005	210	02/02/2005	07/01/2005	9-7x	"
SAAB	S/T	2006	898	10/07/2005	06/18/2006	9-7x	"
SAAB	S/T	2007	956	05/11/2006	05/14/2007	9-7x	"
Isuzu	S/T	2006	400	07/18/2005	06/04/2006	Ascender	"
Isuzu	S/T	2007	177	06/12/2006	05/14/2007	Ascender	"
GM Total:			184,611				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Solectron InvoTronics Inc.
 365 Passmore Ave
 Scarborough, ON M1V 4B3, Canada
 1-416-321-8822

The modules are manufactured in the United States.

EXHIBIT W



GENERAL MOTORS LLC
Global Vehicle Safety

(3 pages)

RECEIVED

By Recall Management Division at 1:40 pm, Jul 02, 2014

July 2, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2007 - 2011 model year Chevrolet Silverado 2500/3500 series and GMC Sierra 2500/3500 series vehicles.

573.6(c)(1): Chevrolet and GMC Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety may exist in certain 2007 - 2011 model year Chevrolet Silverado 2500/3500 series and GMC Sierra 2500/3500 series vehicles equipped with an auxiliary battery, Regular Production Option (RPO) code TP2. The owner manual for these vehicles does not specify a maximum amperage rating for the auxiliary battery feed to a trailer harness. The auxiliary battery feed is equipped with a fusible link, designed to melt and open-circuit if an electrical overload occurs, in order to prevent damage or a possible fire in the vehicle wiring harness. However, if the fusible link melts, it may contact adjacent components and damage the electrical center cover, the nearby wiring harness conduit and other vehicle components, causing smoke or flames.

Customers should not use equipment that exceeds the maximum amperage rating of 40 amperes for the auxiliary battery provision.

573.6(c)(6): On January 19, 2012, the Field Performance Evaluation Director decided to do a Customer Satisfaction Program to close a product investigation related to four reports of underhood fires resulting from an auxiliary battery fusible link wire melting, opening circuit and contacting surrounding components. A design change had already been implemented into production in June 2011.

On May 5, 2014, the Engineering Analysis (EA) department requested that Product Investigations conduct an investigation to confirm the complete population was included in the customer satisfaction program and that the remedy was effective. A Product Investigator



was assigned. From May 20 to May 23, 2014, data was reviewed from a recent pull of GM reports and warranty. The investigation confirmed that all identified vehicles reported to have an incident had been included in the original investigation and vehicle population, including two vehicles involved in two separate incidents subsequent to the customer satisfaction program, which included one fire. Both of these vehicles had not had the repair performed.

The issue was presented during an Open Investigation Review (OIR) on June 23, 2014, and on June 25, 2014, the Safety and Field Action Decision Authority (SFADA) decided to conduct a safety recall for vehicles that have not been repaired under the customer satisfaction program.

573.6(c)(8): Dealers will replace the jumper harness with one that has a 40 amp inline fuse and provide customers supplemental Owner Manual information with maximum current draw for trailer battery feed.

General Motors will provide the dealer bulletin and owner letter mail dates when available.

Pursuant to 577.11, GM will provide reimbursement to owners for repairs according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14260.

Sincerely,



Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES</u> <u>(FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	C/K	2007	1,244	01/18/2007	06/30/2007	Silverado HD	*
Chevrolet	C/K	2008	2,100	05/07/2007	08/29/2008	Silverado HD	"
Chevrolet	C/K	2009	1,299	06/19/2008	10/13/2009	Silverado HD	"
Chevrolet	C/K	2010	741	10/13/2009	06/11/2010	Silverado HD	"
Chevrolet	C/K	2011	1,384	04/22/2010	06/22/2011	Silverado HD	"
GMC	C/K	2007	448	01/22/2007	06/20/2007	Sierra HD	"
GMC	C/K	2008	849	06/29/2007	08/29/2008	Sierra HD	"
GMC	C/K	2009	527	06/18/2008	10/08/2009	Sierra HD	"
GMC	C/K	2010	210	10/14/2009	06/11/2010	Sierra HD	"
GMC	C/K	2011	569	04/29/2010	06/21/2011	Sierra HD	"
GM Total:			9,371				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): N/A

14260

EXHIBIT X



GENERAL MOTORS LLC
Global Vehicle Safety

(3 pages)

RECEIVED

By Recall Management Division at 7:19 am, Jul 29, 2014

July 28, 2014

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Recall Management Division (NVS-215)
1200 New Jersey Avenue, SE – Room W45-306
Washington, DC 20590

Dear Ms. Lewis:

The following information is submitted pursuant to the requirements of 49 CFR 573.6 as it applies to a determination by General Motors to conduct a safety related recall involving 2009-2010 model year (MY) Chevrolet Aveo and 2009 MY Pontiac G3 vehicles.

573.6(c)(1): Chevrolet and Pontiac Brands of General Motors Company.

573.6(c)(2)(3)(4): This information is shown on the attached sheet.

573.6(c)(5): General Motors has decided that a defect which relates to motor vehicle safety exists in certain 2009-2010 MY Chevrolet Aveo and 2009 MY Pontiac G3 vehicles. Certain vehicles equipped with ABS brakes (JM4/JL9), may contain brake fluid that does not inhibit corrosion in the zinc plating on the anti-lock brake system (ABS) module valve armature. Corrosion may lead to a gel build up on the sides of the valve, which could affect the closing motion of the valve. This could result in longer brake pedal travel and/or reduced brake performance, and in rare cases, vehicle instability and a rear wheel lock condition, which may increase the risk of a crash.

573.6(c)(6): This brake fluid condition was previously the subject of a customer satisfaction campaign in North America per a decision by the GM North America Executive Field Action Decision Committee (EFADC) on August 8, 2012. The customer satisfaction campaign commenced in November, 2012. To date, approximately 34% of Chevrolet Aveo and Pontiac G3 vehicles included in the customer satisfaction campaign had not had the service repair completed.

On July 18, 2014, NHTSA and GM met to discuss whether the customer satisfaction campaign should be changed to a safety recall for the remaining vehicle population that had not had the service repair completed.

On July 19, 2014, the SFADA decided to conduct a safety recall for vehicles that had been included in the customer satisfaction program but had not had the service repair performed.



573.6(c)(8): Dealers are to inspect the ABS module and, if necessary, replace the module. Dealers are to also change the brake fluid and provide a supplement to the Owner Manual that instructs customers to use only GM recommended brake fluid.

General Motors will send dealer bulletins on August 11, 2014 and owner letters on August 18, 2014.

Pursuant to 577.11, GM will provide reimbursement to owners for previous repairs according to the plan submitted on May 23, 2013.

573.6(c)(10): General Motors will provide the dealer bulletin and owner letter under separate cover.

573.6(c)(11): General Motors' assigned recall number is 14505.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Latouf", written in a cursive style.

Brian Latouf, Director
Field Product Investigations & Evaluations

Attachment

573.6(c)(2)(3)(4)

VEHICLES POTENTIALLY AFFECTED BY MAKE, MODEL, AND MODEL YEAR
PLUS INCLUSIVE DATES OF MANUFACTURE

<u>MAKE</u>	<u>MODEL SERIES</u>	<u>MODEL YEAR</u>	<u>NUMBER INVOLVED</u>	<u>INCLUSIVE MANUFACTURING DATES (FROM) (TO)</u>		<u>DESCRIPTIVE INFO. TO PROPERLY IDENT. VEH.</u>	<u>EST. NO. W/CONDITION</u>
Chevrolet	T	2009	1,300	02/18/2008	05/21/2009	Aveo	*
Chevrolet	T	2010	315	05/29/2009	05/30/2010	Aveo	*
Pontiac	T	2009	353	02/20/2008	05/22/2009	G3	*
GM Total:			1,968				

* All involved vehicles will be corrected as necessary.

573.6(c)(2)(iv): Dong-a Special Chemical Co., Ltd.
 623-12 Namchon-dong
 Namdong-ku Incheon, Incheon
 South Korea
 011-82-032-812-2581

The brake fluid is manufactured in South Korea.

Continental Automotive Morganton
 1103 Jamestown Rd
 Morganton, NC
 (828) 584-4500

The ABS modules are manufactured in the US.

EXHIBIT Y



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

1200 New Jersey Avenue SE
Washington, DC 20590

October 3, 2014

Mr. Brian Latouf
Director, Field Product Investigations and Evaluations
General Motors LLC
30001 Van Dyke - Mail Code 480-210-2V
Warren, MI 48090-9055

NVS-215KS
14V-542

Subject: Fuel Pump Electrical Terminal Overheating

Dear Mr. Latouf:

This letter serves to acknowledge General Motors LLC's notification to the National Highway Traffic Safety Administration (NHTSA) of a safety recall which will be conducted pursuant to Federal law for the product(s) listed below. Please review the following information to ensure that it conforms to your records as this information is being made available to the public. If the information does not agree with your records, please contact us immediately to discuss your concerns.

Makes/Models/Model Years:

CADILLAC/CTS/2004-2007
CADILLAC/STS/2006-2007

Mfr's Report Date: September 4, 2014

NHTSA Campaign Number: 14V-542

Components:

FUEL SYSTEM, GASOLINE:DELIVERY:FUEL PUMP

Potential Number of Units Affected: 10,005

Problem Description:

General Motors LLC (GM) is recalling certain model year 2004-2007 Cadillac CTS-V vehicles manufactured October 6, 2003, to March 15, 2007, and 2006-2007 Cadillac STS-V vehicles manufactured June 23, 2005, to March 15, 2007. In the affected vehicles, the electrical terminals of the fuel pump module may overheat resulting in the melting of the flange material.

Consequence:

If the flange melts, a hole may be created allowing the fuel pump to leak fuel, causing the vehicle to stall, increasing the risk of a vehicle crash. Additionally, leaking fuel in the presence of an ignition source increases the risk of a fire.

Remedy:

GM will notify owners, and dealers will replace the fuel module and fuel tank jumper harness, free of charge. The manufacturer has not yet provided a notification schedule. Owners may contact Cadillac customer service at 1-800-458-8006. GM's number for this recall is 14405.

Notes:

Owners may also contact the National Highway Traffic Safety Administration Vehicle Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153), or go to www.safercar.gov.

We have received GM's proposed owner notification letter and it is currently under review. You will be notified of any changes or concerns once our review is complete.

Please be reminded of the following requirements:

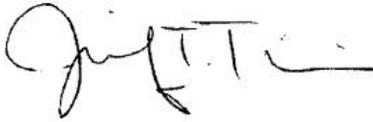
Copies of all notices, bulletins, dealer notifications, and other communications that relate to this recall, including a copy of the final owner notification letter and any subsequent owner follow-up notification letter(s), are required to be submitted to this office no later than 5 days after they are originally sent (if they are sent to more than one manufacturer, distributor, dealer, or purchaser/owner).

You are required to provide an estimated date including month, day, and year, when you will send notifications to owners, dealers, and distributors as soon as it becomes available. Please be reminded that it is required that owners be notified of a safety defect in their vehicles within 60 days of a manufacturer's notification to NHTSA of a safety defect in those vehicles.

As stated in Part 573.7, submission of the first of six consecutive quarterly status reports is required within one month after the close of the calendar quarter in which notification to purchasers occurs. Therefore, the first quarterly report will be due on, or before, 30 days after the close of the calendar quarter.

Your contact for this recall will be Kelly Schuler who may be reached by phone at (202) 366-5227, or by email at kelly.schuler@dot.gov or through the office email at rmd.odi@dot.gov. We look forward to working with you.

Sincerely,



Jennifer Timian
Chief, Recall Management Division
Office of Defects Investigations
Enforcement

EXHIBIT Z

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NBC News

SHOW: TODAY SHOW 7:00 AM EST

June 26, 2014 Thursday

TRANSCRIPT: 062604cb.501

SECTION: NEWS; Domestic

LENGTH: 1785 words

HEADLINE: The headquarters of General Motors, to sit down and talk to the CEO of this company, **Mary Barra**

BYLINE: **MATT LAUER**, KEVIN TIBBLES

GUESTS: **MARY BARRA** <High We`re here a day after this company sent notifications to its dealers in North America to stop selling and delivering 2013 and 2014 Chevy Cruze sedans because of a possible problem with the airbags in those cars. It`s just the latest in a very long list of recalls this company has been through over the past six months.

BODY:

MATT LAUER: Hey, Savannah. Good morning to you. I`m here in Detroit, the headquarters of General Motors, to sit down and talk to the CEO of this company, **Mary Barra**. We`ll talk about with her in just a moment. We`re here a day after this company sent notifications to its dealers in North America to stop selling and delivering 2013 and 2014 Chevy Cruze sedans because of a possible problem with the airbags in those cars. It`s just the latest in a very long list of recalls this company has been through over the past six months. We`ll talk to **Mary Barra** in a second, but first, here`s NBC`s Kevin Tibbles.

(Begin VT)

KEVIN TIBBLES: General Motors is in **Mary Barra`s** blood. She got her start more than thirty years ago working the assembly line. Just six months ago, the mother of two became the first female CEO in the auto giant`s history. She was immediately thrust into the hot seat. Handling a series of massive, high-profile recalls on millions of vehicles for defects going back more than a decade. The airbag problems that have put a halt to the sale of the new Chevy Cruze are just the latest. Barra addressed her employees earlier this month.

MARY BARRA (June 5): We failed these customers, and we must face up to it and we must learn from it.

KEVIN TIBBLES: An internal investigation cleared Barra and other senior managers of covering up problems that are being blamed for more than a dozen deaths.

JOAN CLAYBROOK (Auto Safety Advocate): General Motors has a culture of secrecy and of avoiding responsibility, and **Mary Barra** apparently did not know about this terrible safety defect, but she should have known.

KEVIN TIBBLES: The bottom line clearly shows **Mary Barra** as CEO has the pedal to the metal. GM's sales in May skyrocketed thirteen percent.

Is this all positive news for **Mary Barra**?

MICHELLE KREBS (Autotrader.com Senior Analyst): She's in a situation where she has to keep the company running and on solid ground, but at the same time deal with-- this is a crisis.

KEVIN TIBBLES: This new CEO's real challenge, some say, is insuring GM not only sells cars, but changes its culture from within.

For TODAY, Kevin Tibbles, NBC News, Chicago.

(End VT)

MATT LAUER: And Mary Barra joins us now exclusively. Miss Barra, nice to see you. Good morning.

MARY BARRA (Chief Executive Officer of General Motors): Good to see you.

MATT LAUER: Are you done with recalls? I mean, this has been a long line of recalls, twenty million cars in the last year or so. Are you done?

MARY BARRA: We're going to continue to look at the data that we get and we're going to take the action that we need. That's our commitment to customers. If we find an issue, we're going to deal with it.

MATT LAUER: So, it's possible we could be hearing more recalls down the road?

MARY BARRA: It's-- it's possible.

MATT LAUER: Since this story broke six months or so ago, you have answered very difficult questions, you've gone before Congress, you've seen the headlines. You fired fifteen people. They don't work here anymore because of their involvement in that situation. Have you fired everyone you're going to fire in connection with this situation?

MARY BARRA: Yes, I believe we had. You know, the investigation that was done independently was exhaustive. It went to all areas. And you know, there were people in five different functions across all levels of the company. And I do believe associated with this situation, we-- we have addressed the issue.

MATT LAUER: I think a lot of people wonder; does this go beyond bad communication, mismanagement, bad decision-making within the company. Was something criminal going on inside General Motors? You say you've looked at this exhaustively. Do you think anyone acted in a criminal way in dealing with these ignition switches?

MARY BARRA: You know, clearly, this issue took too long to find it, and in this case we failed our customers. We failed them with these vehicles. Again, you know, the criminal aspect of it, I think that's for the court to decide. I can tell you I've taken action, and the people that I don't think should be a part of the company aren't here anymore.

MATT LAUER: Would you be surprised if criminal charges were filed against anyone who worked for General Motors while this was all going on?

MARY BARRA: Again, that I think is for the courts to decide. I don't think it's right for me to speculate on that. But, you know, clearly, there were mistakes made and we're dealing with the situation.

MATT LAUER: Was there a cover-up? Clearly, a lot of people within this company knew at separate times, it seems, and in different locations, that there was a problem with these ignition switches. And still, as you just mentioned, the company was extremely slow to deal with it. Is that because there was a cover-up?

MARY BARRA: I don't really think there was a cover-up. I think what we had, and it was covered in the report, there were silos of information, so people had bits and pieces and then didn't come forward with information or didn't act with a sense of urgency. And it's simply unacceptable.

MATT LAUER: Did money play a role, Miss Barra? The company was trying to dig its way out of bankruptcy. Cost cutting was essential. Did someone say, hey, it's expensive to recall and fix all those cars? I think 1.7 billion dollars has been set aside. Let's see if we can avoid recalling those cars?

MARY BARRA: Absolutely not. During that same period of time and leading up to when we went through the-- the bankruptcy and restructuring, there were many recalls made. So those decisions were being made. The problem with this is people didn't understand the safety aspects of it, and that, too, we've made substantial changes so that will never happen again.

MATT LAUER: You had to sit down and talk to family members of people who died in crashes related to those faulty ignition switches. As a new CEO, as a mom, what was that like?

MARY BARRA: It was incredibly difficult to know that mistakes were made that caused people to lose loved ones or to have serious physical injury. If I could turn back the clock, I would, but I can't. So, what I want to do is make sure we create the right systems and processes and have the right people that this never happens again, because it was unacceptable.

MATT LAUER: I don't want to make this about you, but at any time during those meetings with those loved ones, did you stop and think, why did I get this job?

MARY BARRA: You know, through tough periods of time, and-- and General Motors has had tough periods in the past, I know the men and women of General Motors, the vast majority come to work every day, they do their best. And so, as difficult as it is, I'm more committed than ever to make sure we-- we make this company what I know it can be.

MATT LAUER: You said something recently that I don't think a lot of CEOs would say. You said you don't want to put this episode behind you at this company. You want it to forever be a part of the collective memory here at General Motors. And I'm going to ask you to explain why when you join us in our next half hour to continue this conversation. Thanks very much. Let's go back to Savannah.

SAVANNAH GUTHRIE: All right, matt, thank you. We look forward to that. And coming up in just a few minutes here, a missing boy found after eleven days. They looked for him all over. He was found in his family's basement. Why was he not discovered sooner? We've got that story. But first, this is TODAY on NBC.

(ANNOUNCEMENTS)

SAVANNAH GUTHRIE: Coming up, why North Korea's leader's calling a new movie an act of war. Plus, we'll check back in with Natalie in a rainy Recife, where she's run into a few famous faces ahead of today's game.

AL ROKER: I don't think Natalie is going to sleep..

SAVANNAH GUTHRIE: But first, your local news.

(ANNOUNCEMENTS)

MATT LAUER: Seven thirty now on a Thursday morning. It's the 26th day of June 2014. Wow, look at that, pretty sunrise in Rio de Janeiro, the soccer capital of the world these days. Actually, the game between the United States and Germany just a couple hours from there in Recife, where Natalie is this morning. And if you want to send us your sunrise, we'd love to see it. You can do that with #TODAYSunrise. Nice shout out on the plaza, too, on this Thursday morning. I'm **Matt Lauer** here in Detroit at the headquarters of General Motors, where in just a couple of minutes we'll continue our conversation with the CEO of this company, **Mary Barra**, talking all about the recalls, about liability within this company and the path to the future. We'll talk to Miss Barra more in just a couple of minutes. But right now, let's go back to New York. Savannah and the gang, you guys have more of the headlines of the morning.

SAVANNAH GUTHRIE: We do, indeed, Matt. Thank you. We'll check in with you in a moment. TODAY's headlines, the U.S., did we mention, taking on Germany at noon eastern in Brazil. This is one of the most anticipated World Cup matches so far. The U.S. can move on to the next round with a win, of course, a draw, or tie. And the team even has a chance if they lose. So, we'll be checking in with Natalie in a moment. New information in the search for missing Malaysian Airlines Flight 370. Investigators say all of the evidence points to the plane being flown on autopilot when it crashed into the Indian Ocean.

And a close eye is being kept on the Mississippi River this morning, which is expected to crest later today. Record amounts of rainfall have led to flooding conditions around the Midwest. Hasn't been like that in years. And Matt, tell us what you're working on for tomorrow, because you have had an extremely busy week.

AL ROKER: Wow.

MATT LAUER: That's right. I'm going to finish here in Detroit and get on a plane and go to Colorado. Tomorrow morning I'll be back in New York, but I'll bring you an exclusive interview with Amy Van Dyken-Rouen, she is the six-time Olympic gold medalist swimmer for the United States who had that terrible ATV accident a couple weeks ago. She severed her spinal cord and was paralyzed as a result. I'm going to spend some time with her in Colorado. She's already making great strides. And we'll have that exclusive interview for you tomorrow on TODAY. And Savannah, I just want to mention, big birthday today. Jack Lauer becomes a teenager. It's not possible.

SAVANNAH GUTHRIE: Oh, my gosh.

MATT LAUER: I demand a recount.

SAVANNAH GUTHRIE: Oh if you're watching, Jack, give your dad a really hard time.

MATT LAUER: It's also Derek Jeter's birthday, but in our house, it's-- that's not important.

SAVANNAH GUTHRIE: Yeah exactly.

PETER ALEXANDER: Things just got interesting.

SAVANNAH GUTHRIE: All right, happy birthday to Jack. And we'll see you in a couple minutes, **Matt**.

MATT LAUER: All right.

LOAD-DATE: June 28, 2014

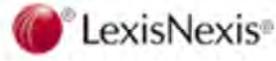
Source: [News & Business](#) > [Individual Publications](#) > [N](#) > [NBC News](#) 

Terms: [Mary w/3 Barra](#) ([Suggest Terms for My Search](#))

Focus: **(Mary w/3 Barra) & (Matt! w/3 Lauer)** ([Exit FOCUS™](#))

View: Full

Date/Time: Tuesday, July 15, 2014 - 12:58 PM EDT



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EXHIBIT AA

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NBC News

SHOW: TODAY SHOW 7:00 AM EST

June 26, 2014 Thursday

TRANSCRIPT: 062606cb.501

SECTION: NEWS; Domestic

LENGTH: 2609 words

HEADLINE: **Mary Barra** has been called the most powerful woman in the history of the auto industry

BYLINE: **MATT LAUER**

GUESTS: **MARY BARRA**

HIGHLIGHT:

She became CEO of General Motors back in January, and since that time she`s had to deal with a spate of problems, massive recalls and a scathing internal report over how this company handled safety concerns. Miss Barra has agreed to an exclusive, live interview this morning, and she`s sticking around.

BODY:

MATT LAUER: Back on a Thursday morning here in Detroit, Michigan. **Mary Barra** has been called the most powerful woman in the history of the auto industry. She became CEO of General Motors back in January, and since that time she`s had to deal with a spate of problems, massive recalls and a scathing internal report over how this company handled safety concerns. Miss Barra has agreed to an exclusive, live interview this morning, and she`s sticking around. Mary, it`s nice to see you. Thank you for staying around.

MARY BARRA: Sure.

MATT LAUER: Thirteen deaths so far have been attributed to ignition switch problems with the Chevy Cobalt. Will that number rise?

MARY BARRA: Again, I think people have misunderstood. The thirteen was when we first looked into this issue and looked at things that could be related to this defect. The compensation program that we`re doing, we want every single person who either lost a loved one or had a serious physical injury to be a part of that program, because we want to do the right thing.

MATT LAUER: You`ve said you don`t want to put this episode in the company`s history behind you. In fact, you said, "I never want to put this behind us. I want to keep this painful experience in our collective memories." When we continue this conversation, I need to know how you plan to do that.

MARY BARRA: Well, we need to make sure we don't forget, because that's the only surefire way to make sure we never repeat it again, and that's what's most important. You know, we want to be a company that our customers trust. When they get behind the wheel, when they get into one of our products, we can't forget what happened.

MATT LAUER: Can they trust this company right now, based on the recall of these twenty million cars?

MARY BARRA: They absolutely can, because we're doing the right thing. We're being guided by our values, and that's to do the right thing for the customer. We make every decision by putting the customer in the center. When we got into this situation, my very first question is, are these cars safe to drive? And I asked our chief engineer, would you put your family in the vehicle?

MATT LAUER: This internal report, I mentioned, was scathing. It talked a lot about the culture at General Motors that has existed for decades. One of the things that shocked me is, is employees would sit in on critical safety meetings and they wouldn't take notes because they thought the lawyers did not want them to take notes. In other words, there would be no paper trail of what was said during those critical safety meetings. Were you aware of that culture? You've been here thirty years.

MARY BARRA: Right. I-- I wasn't aware in these safety meetings they weren't taking notes. What I can tell you right now, they're detailed, and I can tell you I'm copied and I'm reviewing all the material personally.

MATT LAUER: So, how do you change that culture? You have to do it by more than firing people.

MARY BARRA: Right.

MATT LAUER: And instilling the fear of God in them. How do you go about communicating to the people who have been part of the history of this company for years that things must change?

MARY BARRA: I think it's by the way we act. It's the ownership we're taking. It's doing the right thing for the customer. All of those things are communicating to our employees that we want them to do the right thing. And they're stepping up. Matt, when I talked to all of our employees when I was covering the Valukas report, I could see their faces. They-- they accepted it, they internalized. I've gotten hundreds of e-mails. They get it.

MATT LAUER: I want to tread lightly here, but you've heard this. You've heard it in Congress and you've heard it in the headlines, you got this job because you are hugely qualified. Thirty years in this company, a variety of different jobs. But there are some people who are speculating that you also got this job as a woman and as a mom because people within General Motors knew this company was in for a very tough time. And as a woman and a mom, you could present a softer face and softer image for this company as it goes through this horrible episode. Does it make sense or does it make you bristle?

MARY BARRA: Well, it's absolutely not true. You know, I believe I was selected for this job based on my qualifications, but we dealt with this issue. When the senior leadership of the company knew about this issue, we dealt with it the minute we knew.

MATT LAUER: You're a mom, I mentioned, two kids. You said in an interview not long ago that your mom-- that your kids said they're going to hold you accountable for one job--

MARY BARRA: Mm-Hm.

MATT LAUER: --and that is being a mom.

MARY BARRA: Correct.

MATT LAUER: Given the pressures of this job at General Motors, can you do both well?

MARY BARRA: You know, I think I can. I have a great team. We`re-- we`re on the right path. We`re doing the right things. We`re taking accountability. And also I have a wonder-- I have a wonderful family, a supportive husband, and I`m pretty proud of my kids the way they`re supporting me in this.

MATT LAUER: Well, I know it`s a difficult time for you and a very busy time and I really appreciate you taking the time with us.

MARY BARRA: Sure.

MATT LAUER: Here in Detroit this morning. **Mary Barra**, thank you very much.

MARY BARRA: Thank you, **Matt**.

MATT LAUER: All right, let`s go back to Savannah.

SAVANNAH GUTHRIE: All right, Matt. Thank you very much. And coming up, we`ll do Trending, a gentleman`s guide to wearing cologne. What is the perfect amount that a guy should wear? You guys are awesome.

PETER ALEXANDER: (Unintelligible).

SAVANNAH GUTHRIE: Yeah, you`re doing great.

AL ROKER: Peter`s actually sporting the AXE body spray.

SAVANNAH GUTHRIE: Yes, he does. He smells delicious. I wish all of you could just take a whiff. Anyway, coming up next, Carson has a little case of the World Cup fever.

CARSON DALY: I believe that we will win. I believe that we will win.

SAVANNAH GUTHRIE: And he does not want to be well.

CASON DALY: I believe that we will win. I believe-- that will go--

AL ROKER: That`s right.

CROWD (in unison): I believe that we will win. I believe that we will win. I believe that we will win. I believe that we will win.

(ANNOUNCEMENTS)

CROWD (in unison): U.S., that`s the way we like it, we like it, we like it, whoa, whoa, whoa, whoa.

AL ROKER: I believe that we will win. I believe that we will win. I believe that we will win.

SAVANNAH GUTHRIE: I believe that we will win. I believe that we will win. I believe that we will win. That`s the scene in Recife, Brazil. Carson`s doing the hand jive over there.

CARSON DALY: Hey, one-- one chant at a time.

SAVANNAH GUTHRIE: I know.

AL ROKER: I know, Natalie, completely--

CARSON DALY: Recife, slow down. We`re just getting the other chant here in America. Come on in, guys. We have a throwback Thursday edition of World Cup fever, big game today. Some of the players have been tweeting and sending out on Facebook some old pictures. Check out Clint Dempsey back in the day, high school yearbook. They asked him where do you see yourself in five years? He said playing professional soccer in Europe. He ended up doing better than that. There`s Tim Howard, the goalie back in the day. Look how cute he looks with his tie there. Who else we got? Kyle Beckerman, our midfielder, even with the long locks, adorable back in the day. This is a photo we got from Julian Green`s father. They met **Matt Lauer** in a drugstore, eight years ago in Tampa--

AL ROKER: That doesn`t sound right.

CARSON DALY: Julian and his brother. Julian, of course, youngest on Team USA, nineteen years old. Today`s game especially noteworthy for Julian, he was born here in the United States, raised in Germany. Keep those photos coming, Team USA, Twitter, Facebook. I believe that we will win. I believe that we will win. I believe that we will win or even tie. A tie`s okay, it`s okay.

SAVANNAH GUTHRIE: Oh that`s the second stage.

PETER ALEXANDER: That`s the remix.

CARSON DALY: It doesn`t matter. Win or tie.

SAVANNAH GUTHRIE: Carson, thank you. Coming up, we`ll check in with Natalie in Recife. She gets ready to head out to today`s big game with some very enthusiastic fans.

AL ROKER: That`s right. Then in Trending, we have got an epic wedding dance that you have got to see.

PETER ALEXANDER: Whoa.

AL ROKER: Do not leave for work just yet.

PETER ALEXANDER: Breaking it down. Also today, actor Mark Ruffalo on his new movie, it`s called Begin Again. We will have all that after your local news.

(ANNOUNCEMENTS)

SAVANNAH GUTHRIE: It`s eight o`clock on TODAY. Coming up, checking out the major supermarket chain fined for overcharging customers. We`ll tell you what you need to know before you shop.

Plus, water babies. We`ll show you the radical technique that gets infants into the pool and under water before they can crawl.

And World Cup fever. We`ll catch up with Natalie in Brazil as she gets ready to head out with the gang of team USA super fans.

CROWD (in unison): USA! USA! USA!

SAVANNAH GUTHRIE: And for the rest of us who have to work, we`ll tell you the best way to watch the big game, today, Thursday, June 26th, 2014.

(TODAY Throwback Thursday; Al`s Song Pick Earth, Wind & Fire, "Got to Get You Into My Life")

GIRL: Happy birthday to my wonderful father and much love to my family in Western Mass.

BOY: Hi Aunty Bell (ph) back in Tennessee.

MAN: Good morning from Lindsborg, Kansas, Little Sweden, USA.

GIRLS (in unison): Good morning, Iowa.

CROWD (in unison): We love TODAY!

MAN: Good morning from Miami. Whoo!

WOMAN: Good morning, Miami. Whoo!

CROWD (in unison): I believe that we will win!

CARSON DALY: I believe that we will win!

PEOPLE (in unison): I believe that we will win!

SAVANNAH GUTHRIE: See what Carson started this morning? The whole crowd out here on the plaza seen I believe that we will win. Peter`s going. We`ve got Natalie down in Recife.

CARSON DALY: It`s like Recife right here on the plaza.

SAVANNAH GUTHRIE: I bet you Matt is chanting in Detroit.

AL ROKER: Oh, yeah.

SAVANNAH GUTHRIE: By the way, good Throwback Thursday hit.

CARSON DALY: Yeah. Real nice.

AL ROKER: Oh, thank you very much.

SAVANNAH GUTHRIE: Got to Get You Back in My Life.

AL ROKER: Yeah.

CARSON DALY: Yeah. Earth, Wind & Fire.

AL ROKER: Earth, Wind & fire. Earth, Wind & Fire, they were-- that was from the, I forget which movie it was, but it was a good one.

SAVANNAH GUTHRIE: It`s awesome. Speaking of on fire, **Matt Lauer**, world traveler--

CARSON DALY: Yes.

SAVANNAH GUTHRIE: --big exclusive this morning in Detroit. He`s got exclusive coming up Monday and yet another one for tomorrow. Hey, **Matt**.

MATT LAUER: Hey, guys. Nice to see you, Carson, Al, Savannah. That`s right. We`re going to jump on a plane here in a couple of minutes, fly out to Colorado and sit down and talk to Amy Van Dyken-Rouen. She is the six-time Olympic gold medalist in swimming who suffered some

severe injuries a couple of weeks ago in an ATV accident. She`s in rehabilitation. She`s been back in the pool, although this time under very different circumstances. She has so far been an inspiring figure despite what she`s going through, and we`re going to talk to Amy. I`ll bring you that interview tomorrow. And then, yes, Savannah, as you mentioned, Monday, batten down the hatches. We`re going to start our interview with Pippa Middleton. She, of course, the most famous sister in the world right now, and we`re going to be talking to her about a great event she took part in the United States, but also about all the attention for all the reasons that she`s been getting over the past couple of years. So, that`s our interview with Pippa Middleton starting Monday here on TODAY.

SAVANNAH GUTHRIE: All right.

AL ROKER: Very cool.

SAVANNAH GUTHRIE: Always fascinating to hear from someone you`ve never seen give a TV interview before--

CARSON DALY: That`s right.

SAVANNAH GUTHRIE: --so we look forward to that.

MATT LAUER: Right.

SAVANNAH GUTHRIE: Matt, safe travel. See you tomorrow.

MATT LAUER: Thanks.

SAVANNAH GUTHRIE: And now you`ve got something funny coming up.

AL ROKER: What were you going to say, **Matt?**

MATT LAUER: Nothing, see you tomorrow.

AL ROKER: Okay, great. Bye.

CARSON DALY: Bye.

SAVANNAH GUTHRIE: Bye.

AL ROKER: I`m looking forward to this. At 10:00 AM Eastern this morning, I`m going to head into the Orange Room and I`m going to be doing a live Facebook chat. So if you`ve got questions--

SAVANNAH GUTHRIE: That`s cool.

AL ROKER: --I have answers.

CARSON DALY: Have you done it before?

AL ROKER: I`ve not done one for-- for us before. I`m looking forward to it.

SAVANNAH GUTHRIE: It should be fun.

AL ROKER: So that`s at ten Eastern. By the way, Got to Get You Into My Life, Earth, Wind & Fire from Sgt. Pepper`s movie.

SAVANNAH GUTHRIE: Oh, very good.

AL ROKER: Sgt. Pepper`s Lonely Hearts Club Band.

SAVANNAH GUTHRIE: So ask Al anything.

AL ROKER: Anything.

SAVANNAH GUTHRIE: Anything you want.

AL ROKER: Anything.

SAVANNAH GUTHRIE: Nothing is off limits.

CARSON DALY: How many hats do you own?

AL ROKER: How many-- I have, well, these kinds of hats probably about ten.

CARSON DALY: Ten?

AL ROKER: Yeah.

CARSON DALY: Okay. Just getting the conversation going.

AL ROKER: That`s it.

CARSON DALY: You can continue at 10:00 AM.

AL ROKER: That`s it. That`s right.

SAVANNAH GUTHRIE: What`s the forecast in Poughkeepsie?

AL ROKER: I-- I-- it, right now, it`s going to be, kind of, humid and sticky. I also know the forecast in Brazil, it`s feverish.

SAVANNAH GUTHRIE: It is feverish. Very good segue. That leads us to Natalie who`s down in Recife getting ready for the game. Natalie, what are conditions there?

NATALIE MORALES: Well, you know, the conditions are not great. It is raining and soggy, but you can see it`s not going to rain on these fans` parade here. They are here for a party. They`re here for a good time. And more importantly, they are here for a win. They are super confident in the U.S. men`s national team. And if this showing of pride gives you any example, by the way, Americans are the number one ticket holders here at the entire World Cup after the Brazilians. It gives you an idea of how popular this sport is becoming, and most importantly, how much support is here to support Team USA.

MAN: USA.

NATALIE MORALES: Now, I`ve got to say they think they`re fans--

CROWD (in unison): USA.

NATALIE MORALES: --but I did happen to find--

CROWD (in unison): USA! USA!

NATALIE MORALES: --one person here who thinks he may be the biggest fan yet. Take a look.

WILL FERRELL: It's going to be raining, right? And as everyone knows, Germans hate the rain. They're-- not only do they hate it, they're-- they're fearful of it because ninety-three percent of Germans can't swim. They've never learned how to swim.

NATALIE MORALES: So-- so, there you have it. That was a prediction from Mister Will Ferrell himself. We caught up with him last night at a pregame party. He was here, I believe, recording something for his Funny or Die channel. But you can see, I mean they are here by the busloads. Twelve busloads of American Outlaws and other fans showed up here this morning. This is where the action is right now. But a couple of hours from now, it will be the field, and we'll be over there. I'm going to be hanging out with them, so I'm going to be keeping them company. Guys, back to you.

SAVANNAH GUTHRIE: Oh, Natalie, have fun.

CARSON DALY: Cool.

AL ROKER: You know, Germans also afraid of cowbell.

CARSON DALY: True?

AL ROKER: That's good.

SAVANNAH GUTHRIE: I'd love getting little sports analysis from Will Ferrell. Always learn something you didn't know.

AL ROKER: Nothing wrong with that.

SAVANNAH GUTHRIE: All right. Let's check in with Peter Alexander. He's got the top stories. Peter, good morning.

PETER ALEXANDER: Good morning to you.

LOAD-DATE: June 28, 2014

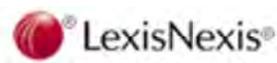
Source: [News & Business > Individual Publications > N > NBC News](#) 

Terms: [Mary w/3 Barra](#) ([Suggest Terms for My Search](#))

Focus: **(Mary w/3 Barra) & (Matt! w/3 Lauer)** ([Exit FOCUS™](#))

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of:

Chapter 11

MOTORS LIQUIDATION COMPANY, Case No.: 09-50026 (REG)
et al, f/k/a General Motors (Jointly Administered)
Corp., et al.,

Debtors.

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STEVEN GROMAN, ROBIN DELUCO,
ELIZABETH Y. GRUMET, ABC
FLOORING, INC., MARCUS

SULLIVAN, KATELYN SAXSON, Adv. Pro. No.:
AMY C. CLINTON, AND ALLISON 14-01929 (REG)

C. CLINTON, on behalf of
themselves, and all other
similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,
Defendant.

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U.S. Bankruptcy Court
One Boling Green
New York, New York

May 2, 2014
9:46 AM

B E F O R E :

HON ROBERT E. GERBER
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Hearing re: Status Conference

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1 The tentative that you had about the GUC Trust,
2 late-filed claims, excusable neglect, we actually think that
3 this is an issue that should be dealt with. It is not our
4 issue, but to the extent that they've raised or some of them
5 have raised a procedural due process issue relating to the
6 bar order, which was after the sale order had taken place
7 and they're saying that they don't have a remedy -- an
8 effective remedy against Old GM, well there is a GUC Trust,
9 there are a number of -- there's a number of values still
10 left in the GUC Trust. Whether they actually are a
11 creditor, where they actually have excusable neglect I'm not
12 trying to prejudge it, but we were urging that they
13 shouldn't just assume that there was nothing there when
14 there is potentially something there and they should be able
15 to and should be almost in fact required to at least explore
16 that as an alternative to try to get a recovery, if they're
17 entitled to a recovery. I wasn't trying to say that they
18 were or not.

19 As far as the suggestion of mediation, it is
20 always hard to say that you're against mediation. The only
21 thing that I would say, Your Honor, is that New GM has hired
22 Ken Feinberg, who is a very well known person who tries to
23 figure out how to deal with circumstances and to how to
24 adjust situations on a non-legal base, but to try to
25 negotiate a resolution.

1 claims, judicially acknowledged late filed claims, will now,
2 as part of a bankruptcy process, go through a procedure for
3 determining what those claims might be worth individually or
4 on some class basis.

5 And when that process is all over, then we can let
6 the GUC Trust and its beneficiaries know that their expected
7 future dividends may have to be adjusted or wiped out in
8 order to allow these new beneficiaries of the trust to, in
9 effect, catch up on distributions that have already been
10 made, if in fact, that can be done as a matter of
11 practicality.

12 And I anticipate that holders of the units
13 including Mr. Golden's clients and others may very well have
14 an opinion about that.

15 Again, it seems to me that before we ever get near
16 that thorny issue, where lots of people are going to be
17 impacted, and it may not be practical, if we resolve the
18 threshold issue of whether, because of lack of due process
19 the injunction ought not to apply, then we never get into
20 this issue. Unless someone were to argue that
21 notwithstanding the denial of due process the right remedy
22 is not let the injunction dissolve, but the right remedy is
23 somehow to treat these people as if they had late filed
24 claims, and will now just dilute all of the other
25 beneficiaries of the GUC Trust.

1 And to the extent that Mr. Weisfelner conceded
2 that he wasn't a class action lawyer, or a negligence
3 lawyer, he's probably also not a scientist or an engineer
4 who could decide whether the air bag issue is one thing or
5 another thing.

6 I only say that again because the people listening
7 here, that it should be absolutely clear that you can say
8 whatever you want to say, but at the end of the day, it
9 ultimately has to be grounded in fact and a probable claim.

10 Other than that, Your Honor, we appreciate the
11 time you've given us today.

12 THE COURT: All right. Ladies and gentlemen, I
13 want you to take a lengthy bathroom break, but hopefully no
14 more than that. I would like people who are interested in
15 my resulting directions to be back in 15 minutes. That
16 would be 25 to 1 on the clock up there.

17 I can't guarantee you that I'll have it buttoned
18 up all then, but I don't want to impose on you to wait any
19 more than you need to. We're in recess.

20 (Recessed at 12:21 p.m.; reconvened at 1:10 p.m.)

21 THE COURT: Have seats, please. I apologize for
22 keeping you all waiting. Here's what we're going to do. In
23 most respects, it will be similar to my tentatives, but with
24 some refinements.

25 One, I want to leave as much time for thoughtful

1 briefing and thought by the Court as possible. But at the
2 same time, I want this to proceed as expeditiously as I can
3 consistent with fairness. So we're going to consider as
4 threshold issues the two remaining issues shown on Mr.
5 Weisfelner's blackline, the discrimination argument, the
6 possibility that the claims now being asserted may be claims
7 against Old GM or the GUC Trust, and subject to what I say
8 momentarily, even the fraud on the Court contentions.

9 Messrs. Steinberg, Weisfelner, Flaxer, Martorana,
10 and Golden, or their designees, are to confer and to prepare
11 an order then to be settled on three business days' notice
12 or overnight mail, consistent with these determinations that
13 I'm dictating now, but putting meat on the bones, and
14 providing for agreed upon dates.

15 Two, you're to meet and confer to agree upon facts
16 to the maximum extent possible, consistent with your
17 professional duties to your clients. To the extent you need
18 to agree to disagree, you're to identify the matters that
19 you can't agree upon and jointly present those identified
20 matters to me, after which I'll determine the materiality of
21 what's not agreed on and how it should affect further
22 proceedings, either by way of authorizing limited discovery,
23 or by taking issues off the table for now, and determining
24 them later.

25 As a general matter, we're going to get as far as

1 we can without discovery. And notwithstanding what my case
2 management order otherwise provides, there will be no
3 discovery in either the adversary proceeding or the
4 contested matter until and unless I order otherwise.

5 Three, I consider it preferable to consider the
6 fraud on the Court claims as early as possible, and at this
7 juncture, I'm including it as an issue to bring before me as
8 one of the threshold issues.

9 But I recognize or at least assume that the fraud
10 on the Court claim is likely to require at least some
11 discovery. You're to confer and see if you can agree on
12 limited discovery that will meet your respective needs on
13 this. I hope, but I'm not sure that you'll be successful.

14 If after good faith discussion, agreeing on
15 limited discovery is impossible, either side will be
16 permitted to take the fraud on the Court issues off the
17 table as threshold matters, and to defer them for
18 consideration until a later time, assuming that you first
19 identified the problem to me and gotten my green light to do
20 so.

21 Four, I agree with Mr. Martorana and Mr. Golden
22 that the matters involved in compliance with Pioneer are
23 fact intensive, and are not appropriately threshold issues.
24 But any party will be free to assert that claims now being
25 asserted against New GM are prepetition and not post-

1 petition claims.

2 Before any decision is made on the extent to which
3 the GUC Trust might have to satisfy any of those claims,
4 each of Wilmington Trust and any holders of GUC Trust units
5 will have full opportunity to be heard on any and all
6 issues.

7 Each of Wilmington Trust and any holders of GUC
8 Trust units, though in the latter case, with the same kinds
9 of coordination that I expect from the plaintiffs' side,
10 will have unlimited standing to be heard on not just GUC
11 Trust related issues, but on any of the issues that we're
12 considering as part of this exercise; either in the
13 adversary proceeding or the contested matter.

14 Likewise, in the Wilmington Trust and any holders
15 of GUC Trust units, again subject to the coordination
16 requirement, will be free to participate in any discovery I
17 authorize in connection with the remainder of the issues,
18 even though I'm not authorizing any such discovery now.

19 But related to that, to the extent Wilmington
20 Trust told me in our discussion that it had a desire for
21 discovery, its request for that is denied at this time,
22 without prejudice to renewal at a time when it's more
23 appropriate.

24 Five, I will not interfere with the MDL panel's
25 hearing now scheduled for May 29 and will permit the

1 judicial panel and multi-district litigation to rule on
2 where pretrial proceedings with respect to any of the
3 underlying actions might proceed.

4 But this ruling is without prejudice to the rights
5 of any party to ask me to stay further proceedings before
6 the transferee judge based on rulings in this Chapter 11
7 case, or based on any perceived delay in my issuing rulings
8 in this Chapter 11 case.

9 Six, anyone who is unwilling to agree to the
10 temporary stand still that the majority seems to agree upon
11 must come forward before me within a time certain, either on
12 the date proposed in the Steinberg and Weisfelner letters,
13 or an alternative date they might agree upon, in
14 consultation with the other parties that I've allowed to
15 participate in the formation of the order, with a motion
16 asking me to rule on whether I should force such a
17 standstill on the dissenter by TRO or preliminary
18 injunction.

19 Nothing in the scheduling order will, however,
20 change the usual burdens associated with getting a TRO or
21 preliminary injunction relief.

22 Seven, parties are to identify any and all issues
23 they want me to decide by a date certain to be proposed by
24 that team who I've designated for that purpose, the same one
25 that's preparing the proposed form of order, and to state

1 whether or not their issues to be addressed as threshold
2 issues or not.

3 They are then to confer with the others as to when
4 any such issues are best decided, whether as threshold
5 issues or as later issues. If any such additional issues
6 are to be presented as threshold issues, briefing on them
7 should be rolled into the briefing, otherwise authorized.
8 But if they're not perceived to be threshold issues, they
9 can be deferred with a full reservation of rights.

10 Eight, matters in the adversary proceeding and in
11 the contested matter will be jointly administered. For the
12 avoidance of doubt, this will include joint briefing and
13 joint discovery, if and when any discovery is authorized.

14 Parties should agree upon a preferred place for a
15 single docket to file all of the documents in connection
16 with this controversy, and to provide for that in the
17 proposed order. As far as I'm concerned, either the
18 adversary or the contested matter will be equally
19 satisfactory.

20 Nine, other than as I stated, I don't think that I
21 intended to disapprove anything that had been agreed upon
22 between Mr. Steinberg and the class action plaintiff
23 steering committee. But for the avoidance of doubt, if you
24 think I left something out, or was inconsistent in my
25 rulings, I would ask that you tell me that now.

1 Ten, the matter of mediation is deferred without
2 prejudice to anyone's right to raise the issue at a later
3 time.

4 So, folks, you can take the weekend off, but after
5 that, please get together as soon as practical to get me an
6 agreed upon form of order, at least agreed upon between the
7 people I mentioned, then to be settled. That order should
8 take care of details, such as proposed dates, which I've
9 intentionally left out of the rulings I just announced. I
10 think you can and should meet your needs and concerns on
11 that.

12 Now, not by way of reargument, I suspect that
13 there may be some details I failed to address or some loose
14 ends, and I'll allow people to be heard on that.

15 Mr. Steinberg?

16 MR. STEINBERG: Your Honor, I think I can deal
17 with everything you said. The only thing is, do we talk to
18 your chambers about the next status conference date, or do
19 you want to give us the date and we'll try to back into to
20 the sum of the requirements before then?

21 THE COURT: My preference, I think, Mr. Steinberg,
22 is that we do it as an iterative process. You guys, after
23 you've figured out the time you need, tell me what you would
24 recommend as far as a date within a zone. Thereupon my
25 courtroom deputy, Ms. Calderone will see how it fits into

1 the schedule. She'll advise you what we're in a position to
2 do, and then you can either massage your dates, or plug the
3 date we give you into the order that you settle.

4 MR. STEINBERG: That's acceptable, thank you.

5 THE COURT: Okay. Anything else? Mr. Esserman,
6 were you rising to be heard in any way?

7 MR. ESSERMAN: No, thank you, Your Honor.

8 THE COURT: Oh, okay. All right. Does anybody
9 have anything else?

10 (No response)

11 THE COURT: No. Okay. Thank you very much.

12 We're adjourned.

13 (Proceedings concluded at 1:22 PM)

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EXHIBIT CC

1 UNITED STATES BANKRUPTCY COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 Case No. 09-50026 (REG)

4 (Jointly Administered)

5 - - - - - x

6 In the Matter of:

7 MOTORS LIQUIDATION COMPANY, ET AL.,

8 f/k/a General Motors Corp., et al.,

9 Debtors.

10 - - - - - x

11 ADV. PROC. NO.: 14-01929 (REG)

12 STEVEN GROMAN, ROBIN DELUCO,

13 ELIZABETH Y. GRUMET, ABC FLOORING, INC.,

14 MARCUS SULLIVAN, KATELYN SAXSON, AMY C.

15 CLINTON, AND ALLISON C. CLINTON, on behalf

16 of themselves, and all others similarly situated,

17 Plaintiffs,

18 v

19 GENERAL MOTORS, LLC,

20 Defendant.

21 - - - - - x

22 U.S. Bankruptcy Court

23 One Bowling Green

24 New York, New York

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July 2, 2014

9:46 AM

B E F O R E :

HON ROBERT E. GERBER

U.S. BANKRUPTCY JUDGE

1 "No Stay Pleadings" filed in connection with Scheduling
2 Order Regarding (I) Motion of General Motors, LLC Pursuant
3 to 11 U.S.C. Section 105 and 363 to Enforce the Court's July
4 5, 2009 Sale Order and Injunction, and (II) Objection Filed
5 by Certain Plaintiffs in Respect Thereto, and (III)
6 Adversary Proceeding No. 14-01929 (ECF 12697)

7

8 Motion of General Motors, LLC to Establish Stay Procedures
9 for Newly-Filed Ignition Switch Actions, filed by General
10 Motors, LLC (ECF 12725)

11

12 In re Motors Liquidation Company, et al., Case No. 09-50026
13 (REG): Motion of General Motors, LLC Pursuant to 11 U.S.C.
14 Section 105 and 363 to Enforce Sale Order and Injunction
15 ("Motion to Enforce"), filed by General Motors, LLC (ECF
16 12620, 12621)

17

18 Motion for Leave to Pursue Claims Against General Motors,
19 LLC and, Alternatively, to File a Post-Bar-Date Proof of
20 Claim in the Motors Liquidation Company Bankruptcy, filed by
21 Roger Dean Gillispie ("Gillispie Motion") (ECF 12727)

22

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25 Transcribed by: Sherri L. Breach

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1 factual stipulations, and we'll have 12 or 15 days to try to
2 figure it out. I'm not exactly sure why they think they
3 need to impose other requirements on their affirmative
4 defense.

5 THE COURT: Is your position, in substance, likely
6 to be that, whether or not you win on a 1(a) issue, you
7 still don't have to pay?

8 MR. STEINBERG: That's correct, because the
9 obligation is Old GM who committed the procedural due
10 process violation, and we're the good faith purchaser for
11 value and that we're entitled to the protections that the
12 courts have affirmed. That would be our position. I think
13 I've said it to them.

14 THE COURT: Without ruling on the merits of the
15 position, I can't say that what you just told me came as a
16 surprise to me.

17 MR. STEINBERG: Right, and it doesn't come as a
18 surprise to them. I've said it every chance I have.

19 THE COURT: Mr. Inselbuch, I don't see the need to
20 be as significant as you do. If any further clarification
21 of what Mr. Steinberg just told me is practical, give it to
22 Mr. Steinberg. To the extent that you've pretty much said
23 it all, then work with that, Mr. Inselbuch.

24 MR. INSELBUCH: Yes, I think we have their
25 statement. We don't need a ruling from Your Honor. Thank

EXHIBIT DD

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of:

Chapter 11

MOTORS LIQUIDATION COMPANY, Case No.: 09-50026 (REG)
et al, f/k/a General Motors (Jointly Administered)
Corp., et al.,

Debtors.

----- x

U.S. Bankruptcy Court
One Boling Green
New York, New York

August 18, 2014
9:46 AM

B E F O R E :
HON ROBERT E. GERBER
U.S. BANKRUPTCY JUDGE

1 Hearing re: Threshold Issues Letters, filed pursuant to the
2 Supplemental Scheduling Order, Dated July 11, 2014.

3

4 Hearing re: Motion of General Motors LLC Pursuant to 11
5 U.S.C. § 105 And 363 To Enforce the Sale Order And
6 Injunction ("Motion to Enforce"), filed by General Motors
7 LLC (ECF 12620, 12621).

8

9 Hearing re: Motion of General Motors LLC Pursuant to 11
10 U.S.C. §§ 105 and 363 to Enforce This Court's July 5, 2009
11 Sale Order And Injunction Against Plaintiffs In Pre-Closing
12 Accident Lawsuits ("Pre-Closing Accident Lawsuits Motion to
13 Enforce"), filed by General Motors LLC (ECF 12807).

14

15 Hearing re: Motion of General Motors LLC Pursuant to 11
16 U.S.C. §§ 105 and 363 To Enforce This Court's July 5, 2009
17 Sale Order And Injunction (Monetary Relief Actions, Other
18 than Ignition Switch Actions) ("Monetary Relief Actions
19 Motion to Enforce"), filed by General Motors LLC (ECF
20 12808).

21

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25 Transcribed by: Dawn South

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1 Peller's arguments comes to mind, although in a different
2 procedural context. And what's a yellow light? I concede
3 that reading the complaint helps that threshold issue, which
4 is why we agreed to defer it, but there's nothing about the
5 complaint that's going to impact equitable mootness, that's
6 a legal argument.

7 And now I'll be perfectly frank in terms of what
8 our motivations are. I want to be able -- we want to
9 collectively be able to write a brief to you that says, Your
10 Honor, due process was violated in this context and the only
11 proper remedy for a violation of due process is that the
12 sale order, or more particularly the sale order injunction,
13 can't be imposed against the people whose due process rights
14 were violated. Period, end of a very long story, everything
15 else is in front of Judge Furman.

16 What I don't want to have to brief simultaneously
17 is if I'm wrong and due process -- due process wasn't
18 violated or the appropriate remedy for a violation of due
19 process is not that the sale order injunction doesn't get
20 applied to me but now somehow the only recourse I have is
21 against Old GM.

22 THE COURT: Pause, please, Mr. Weisfelner.

23 You've been around the block a couple of times.
24 Don't lawyers write briefs with an if I'm wrong second and
25 third and fourth argument following the first?

EXHIBIT EE

Bloomberg

GM Could Face \$2 Billion Tab If Bankruptcy Shield Falls

By Margaret Cronin Fisk, Jeff Green and Linda Sandler - Nov 5, 2014

Jesse Salazar III says an ignition-switch flaw in his 2008 Chevrolet HHR has depressed its value, and he wants manufacturer [General Motors Co. \(GM\)](#) to make it up to him. GM will argue in court filings later today that it shouldn't owe money to Salazar and hundreds of thousands of people like him.

Salazar has several thousand dollars at stake in U.S. bankruptcy Judge Robert Gerber's ruling. Hanging in the balance for GM is more than \$2 billion, according to a [Bloomberg News](#) calculation.

It's increasingly likely that Gerber may say customers such as Salazar should be given a shot at collecting, said Chip Bowles, a bankruptcy lawyer at Bingham Greenebaum Doll LLP. "He could easily rule that," said Bowles, who isn't involved in the case.

At issue is whether the biggest U.S. automaker bears liability related to vehicles it built and sold before its July 2009 bankruptcy. The matter came to a head after [GM](#) recalled 2.2 million U.S. vehicles with an ignition-switch flaw that has been linked to at least 30 deaths.

GM has said it's setting aside as much as \$600 million to compensate people who were injured or lost loved ones in those vehicles, including pre-bankruptcy models, that inadvertently lost power. GM says it isn't obligated, however, to pay economic damages to people who claim those same pre-bankruptcy cars are worth less because of the flaw.

"We believe our position is consistent with federal law and previous decisions of the [bankruptcy court](#), which have been upheld on appeal and are cited in GM's motion papers," the company said in a statement yesterday.

Class Action

That's because the bankruptcy plan shielded the new GM from many of its predecessor's obligations, the company says. GM is expected today to ask Gerber -- who oversaw GM's Chapter 11 proceedings -- to uphold that bankruptcy shield. Today's filings will also amount to GM's first formal bid to knock out a massive car-price class action filed against it last month.

The challenge to GM comes five years after the Obama administration spent almost \$50 billion to save the company, which was costing taxpayers \$2 billion a month, according to “Overdrive” by [Steven Rattner](#), the government’s adviser on the GM bailout. In a 40-day reorganization, GM terminated four of its U.S. brands and shed worker costs. That helped put it back on the path to North American operating profits, which in the third quarter amounted to \$2.45 billion.

Gerber has said he’ll hold a hearing after Jan. 26 and then take more than a month to decide the “difficult” issue of GM’s duties to car owners.

‘Self-Destruct’

GM has said that some engineers and in-house lawyers knew about the potentially defective switches more than a decade ago. But top executives didn’t, it has said, so they couldn’t have declared potential claims related to the flaw as a liability at the time of the bankruptcy.

Gerber has said that if he determines he was misled about the company’s knowledge of the defects, or decides the company knew enough to warn customers, the [bankruptcy protection](#) could “self-destruct.”

“In bankruptcy, you have to disclose your assets and liabilities. Those are basic requirements -- and GM didn’t do it,” said Bowles. “It would be very easy for Gerber to say, ‘Guess what? If you know someone is a creditor you have to give them notice. If you fail to do so, they aren’t constitutionally bound by my orders.’ ”

Gerber declined to comment on matters pending in his court.

Losing Power

Early this year, GM recalled 2.6 million vehicles -- 2.2 million in the in the U.S. -- including Chevrolet Cobalts, Saturn Ions and Pontiac G5 small cars, warning of inadvertent ignition-switch shutoffs that cut power to steering, brakes and air bags. It hired lawyer [Kenneth Feinberg](#) to settle with victims of accidents related to that pool of vehicles, most built before the bankruptcy.

Many people who still own such cars say that whether they’ve had accidents or not, they should be compensated for their vehicles’ lost value related to the recalls. GM has denied that the recalls set off such devaluations.

Salazar, a 28-year-old videographer in [San Antonio](#), paid \$8,000 in 2010 to buy his used HHR, which he said was good for hauling his film gear. As he was driving to Austin in January, the vehicle lost power, he said. Salazar said he had to muscle it to the side of the road. Mechanics couldn’t figure out what was wrong.

\$500 Trade-In

In March, he said, he received a recall notice from GM. His dealer told him it didn't have a replacement ignition switch. Later, Salazar said, he received a flier saying the car was worth \$500 on a trade-in.

Salazar is among the car owners who have joined with others to file more than 100 lawsuits seeking to recover lost value connected to the recalls.

"We wanted to get a new car, but we can't do anything with this one," Salazar said, adding that he doesn't understand why GM wouldn't be responsible. "It's not like someone else made the vehicle."

The 100-plus suits, filed on Oct. 14 as two proposed class actions on behalf of all owners of recalled cars, are combined before U.S. District Judge Jesse Furman in federal court in Manhattan.

Two Suits

One of the actions is on behalf of drivers of vehicles purchased after the bankruptcy that were recalled for various defects. It seeks more than \$10 billion in compensation and damages for fallen car prices. More than 20 million customers could join that suit, said plaintiffs' lawyer [Steve Berman](#), of Hagens Berman Sobol Shapiro LLP. The claim of Salazar, who bought his used car in 2010, would be covered by this class.

The other action filed last month is for recalled vehicles that were purchased before GM emerged from bankruptcy.

GM claims bankruptcy-shield protection for vehicles in both actions. Both are awaiting Gerber's decision.

When Gerber freed GM from most obligations for its predecessor's cars in 2009, he said that was the [U.S. Treasury's](#) price for buying the revamped automaker's stock. In a shaky economy, Treasury officials wanted GM to take on minimal liabilities so it could prosper, leaving the big burdens with its bankrupt predecessor, he said.

Since then, the company has built a new lineup of critically acclaimed cars, helping it return to profitability and maintain the buffer of cash it gained in the bankruptcy. GM's available liquidity was \$36.6 billion at the end of September, down from \$37.3 billion a year earlier, in part because of lingering costs to cover recall expenses.

Saturn Challenge

As recently as 2012, Gerber decided his rulings were still valid, rejecting Saturn owners' requests for payments related to transmission repairs.

Then came the ignition-switch recall. In June, an investigator paid by GM reported the company's decade-long knowledge of the faulty switch.

If then-Chief Executive Officer [Fritz Henderson](#) "knew about the switch problem and intended to keep it from me, that might constitute fraud on the court," Gerber said at a July court conference in Manhattan. Henderson has said he didn't know about the issue.

To understand GM's potential liabilities, Bloomberg News examined price data and locations for the pool of 2.2 million cars subject to the initial recalls. The analysis used recoveries available under each state's deceptive trade practices or [consumer protection laws](#).

Kansas Damages

In 21 states, owners can claim a fixed amount, regardless of actual lost value -- from \$25 per model in [Massachusetts](#) to \$10,000 in [Kansas](#). In [Texas](#) and 15 other states, owners can automatically triple their lost value. Other states allow the judge to decide to triple the value on a case-by-case basis.

Bloomberg News determined the state-by-state location of 1.96 million vehicles using Polk data provided by Edmunds.com, a vehicle pricing and sales website. The rest weren't in the Edmunds.com data, possibly because they aren't still on the road. Estimated values for the models in January and August -- before and after the recall, respectively -- were provided by Kelley [Blue Book](#), which tracks car and truck prices.

Relatively few of the vehicles subject to the initial recall were made after GM's bankruptcy. For those, GM would be liable for more than \$472 million in economic-loss payments.

Total Tab

If Gerber rules that vehicle owners can try to collect economic damages on pre-bankruptcy cars, it would add about \$2 billion to the potential payout -- making GM's liability for statutory damages roughly \$2.5 billion in all, according to this analysis.

GM declined to comment on any potential costs associated with losing its bankruptcy shield.

For an automaker, \$2 billion is a "princely sum" that could be used to create an entire new vehicle platform and engine, said Larry Dominique, a former vice president of product planning for Nissan Motor Co. Or, it could cover the cost of retrofitting an existing factory for a new product or developing two new models off an existing platform, said Dominique, who is now president of ALG, which

estimates vehicle resale values.

Most states also allow for punitive damages as well as recovery for attorney fees, which could push the potential liability higher.

If Gerber cracks open the shield, that may be only the beginning. Beyond the 2.2 million vehicles, GM has recalled more than 9.6 million cars and trucks for other ignition issues. More than 90 percent of those were built before the company emerged from bankruptcy.

GM, anticipating suits over all old GM car defects, has asked Gerber to knock them out along with the ignition-switch actions.

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EXHIBIT FF

Date	Last Price	Volume	Mkt Value[1]
TOTAL		100,000,996.00	2,088,781,236.30
10/21/14	21.85	35,923.00	784,917.55
10/20/14	21.1	135,000.00	2,848,500.00
10/17/14	20.5	20,508.00	420,414.00
10/16/14	22	6,031.00	132,682.00
10/15/14	21.86	4,683.00	102,370.38
10/14/14	22.6	26,369.00	595,939.40
10/13/14	23	3,911.00	89,953.00
10/10/14	23.4	99,060.00	2,318,004.00
10/09/14	23.75	348,000.00	8,265,000.00
10/08/14	24.35	72,068.00	1,754,855.80
10/07/14	24.4	115,000.00	2,806,000.00
10/06/14	25.05	10,251.00	256,787.55
10/03/14	25.1	4,237.00	106,348.70
10/02/14	25	46,002.00	1,150,050.00
10/01/14	24.25	24,362.00	590,778.50
09/30/14	24.45	40,419.00	988,244.55
09/29/14	25.25	8,351.00	210,862.75
09/26/14	25.25	6,982.00	176,295.50
09/25/14	25.25	56,728.00	1,432,382.00
09/24/14	25.4	5,651.00	143,535.40
09/23/14	25.3	9,729.00	246,143.70
09/22/14	25.3	30,005.00	759,126.50
09/19/14	25.65	5,450.00	139,792.50
09/18/14	25.6	5,988.00	153,292.80
09/17/14	25.524	11,150.00	284,592.60
09/16/14	25.45	8,398.00	213,729.10
09/15/14	25.25	8,742.00	220,735.50
09/12/14	25.25	8,403.00	212,175.75
09/11/14	25.25	11,879.00	299,944.75
09/10/14	25.4	5,569.00	141,452.60
09/09/14	25.41	73,320.00	1,863,061.20
09/08/14	25.6	281,000.00	7,193,600.00
09/05/14	26.1	11,013.00	287,439.30
09/04/14	26.1	331,000.00	8,639,100.00
09/03/14	26.05	223,000.00	5,809,150.00
09/02/14	25.9	97,412.00	2,522,970.80
08/29/14	25.52	2,814.00	71,813.28
08/28/14	25.35	189,000.00	4,791,150.00
08/27/14	25.4	5,760.00	146,304.00
08/26/14	25.35	5,630.00	142,720.50

Date	Last Price	Volume	Mkt Value[1]
08/25/14	25.12	3,164.00	79,479.68
08/22/14	25.5	21,051.00	536,800.50
08/21/14	25.35	5,055.00	128,144.25
08/20/14	25.25	4,243.00	107,135.75
08/19/14	25.35	83,880.00	2,126,358.00
08/18/14	25	6,036.00	150,900.00
08/15/14	24.58	125,000.00	3,072,500.00
08/14/14	24.4	9,215.00	224,846.00
08/13/14	24.35	76,016.00	1,850,989.60
08/12/14	24	3,492.00	83,808.00
08/11/14	23.9	8,829.00	211,013.10
08/08/14	23.65	2,852.00	67,449.80
08/07/14	23.75	10,503.00	249,446.25
08/06/14	23.7	9,748.00	231,027.60
08/05/14	23.73	8,610.00	204,315.30
08/04/14	23.76	4,073.00	96,774.48
08/01/14	24.1	126,000.00	3,036,600.00
07/31/14	24.1	185,000.00	4,458,500.00
07/30/14	24	139,000.00	3,336,000.00
07/29/14	24	7,680.00	184,320.00
07/28/14	24.1	6,822.00	164,410.20
07/25/14	24.23	12,877.00	312,009.71
07/24/14	25.01	170,000.00	4,251,700.00
07/23/14	25.76	73,520.00	1,893,875.20
07/22/14	25.6	52,129.00	1,334,502.40
07/21/14	25.23	156,000.00	3,935,880.00
07/18/14	25.1	3,071.00	77,082.10
07/17/14	25.01	58,292.00	1,457,882.92
07/16/14	25.25	92,737.00	2,341,609.25
07/15/14	25.1	10,160.00	255,016.00
07/14/14	25.20000076	11,017.00	277,628.41
07/11/14	25.4	8,101.00	205,765.40
07/10/14	25.2	52,388.00	1,320,177.60
07/09/14	25.1	13,200.00	331,320.00
07/08/14	25.35	361,481.00	9,163,543.35
07/07/14	25.2	8,354.00	210,520.80
07/04/14			-
07/03/14	25.4	53,451.00	1,357,655.40
07/02/14	26	6,317.00	164,242.00
07/01/14	26.35	62,366.00	1,643,344.10
06/30/14	25.6	105,361.00	2,697,241.60
06/27/14	25.9	12,696.00	328,826.40

Date	Last Price	Volume	Mkt Value[1]
06/26/14	26.18	226,513.00	5,930,110.34
06/25/14	26.45	34,902.00	923,157.90
06/24/14	25.65	43,895.00	1,125,906.75
06/23/14	25.68	65,781.00	1,689,256.08
06/20/14	25.01	146,926.00	3,674,619.26
06/19/14	25.42	196,299.00	4,989,920.58
06/18/14	25.7	164,132.00	4,218,192.40
06/17/14	26.08	933,718.00	24,351,365.44
06/16/14	26.1	207,217.00	5,408,363.70
06/13/14	25.7	5,444.00	139,910.80
06/12/14	25.6	8,620.00	220,672.00
06/11/14	25.75	8,710.00	224,282.50
06/10/14	26.1	35,446.00	925,140.60
06/09/14	26.05	40,118.00	1,045,073.90
06/06/14	26.04	90,254.00	2,350,214.16
06/05/14	25.73	385,879.00	9,928,666.67
06/04/14	25.6	751,212.00	19,231,027.20
06/03/14	25	186,207.00	4,655,175.00
06/02/14	25	181,527.00	4,538,175.00
05/30/14	24.98	272,730.00	6,812,795.40
05/29/14	25.15	236,410.00	5,945,711.50
05/28/14	25.15	107,307.00	2,698,771.05
05/27/14	25.15	268,295.00	6,747,619.25
05/26/14			-
05/23/14	25.06	22,820.00	571,869.20
05/22/14	25.15	470,049.00	11,821,732.35
05/21/14	25.35	31,319.00	793,936.65
05/20/14	25.26	85,129.00	2,150,358.54
05/19/14	25.93	267,868.00	6,945,817.24
05/16/14	26.05	192,588.00	5,016,917.40
05/15/14	26.1	377,524.00	9,853,376.40
05/14/14	26.74	337,188.00	9,016,407.12
05/13/14	26.8	387,932.00	10,396,577.60
05/12/14	26.83	271,583.00	7,286,571.89
05/09/14	26.8	159,731.00	4,280,790.80
05/08/14	27.25	250,006.00	6,812,663.50
05/07/14	27.62	11,163.00	308,322.06
05/06/14	27.8	306,545.00	8,521,951.00
05/05/14	27.75	209,027.00	5,800,499.25
05/02/14	27.8	720,744.00	20,036,683.20
05/01/14	27.85	8,065.00	224,610.25
04/30/14	27.55	8,003.00	220,482.65

Date	Last Price	Volume	Mkt Value[1]
04/29/14	27.2	27,616.00	751,155.20
04/28/14	27.15	84,767.00	2,301,424.05
04/25/14	26.8	179,608.00	4,813,494.40
04/24/14	26.9	752,364.00	20,238,591.60
04/23/14	27.05	91,377.00	2,471,747.85
04/22/14	26.55	270,305.00	7,176,597.75
04/21/14	26	1,089,474.00	28,326,324.00
04/18/14			-
04/17/14	25.95	511,642.00	13,277,109.90
04/16/14	25.5	1,567,953.00	39,982,801.50
04/15/14	26.3	129,796.00	3,413,634.80
04/14/14	25.6	128,230.00	3,282,688.00
04/11/14	25.4	311,881.00	7,921,777.40
04/10/14	26.56	145,784.00	3,872,023.04
04/09/14	25.67	43,180.00	1,108,430.60
04/08/14	27.45	11,159.00	306,314.55
04/07/14	27.5	74,561.00	2,050,427.50
04/04/14	27.86	61,511.00	1,713,696.46
04/03/14	28.46	295,241.00	8,402,558.86
04/02/14	28.15	563,647.00	15,866,663.05
04/01/14	28.35	127,359.00	3,610,627.65
03/31/14	28.85	16,028.00	462,407.80
03/28/14	29.3	105,313.00	3,085,670.90
03/27/14	29.2	5,114.00	149,328.80
03/26/14	29.21	202,456.00	5,913,739.76
03/25/14	29.35	59,119.00	1,735,142.65
03/24/14	29.7	275,202.00	8,173,499.40
03/21/14	29.51	681,445.00	20,109,441.95
03/20/14	29.9	330,619.00	9,885,508.10
03/19/14	29.77	102,393.00	3,048,239.61
03/18/14	29.76	164,912.00	4,907,781.12
03/17/14	29.45	55,878.00	1,645,607.10
03/14/14	29.4	931,591.00	27,388,775.40
03/13/14	29.3	123,830.00	3,628,219.00
03/12/14	30.11	178,487.00	5,374,243.57
03/11/14	31	77,396.00	2,399,276.00
03/10/14	32.2	33,321.00	1,072,936.20
03/07/14	32.61	7,361.00	240,042.21
03/06/14	32.9	224,439.00	7,384,043.10
03/05/14	32.75	334,569.00	10,957,134.75
03/04/14	32	13,375.00	428,000.00
03/03/14	31.3	10,590.00	331,467.00

Date	Last Price	Volume	Mkt Value[1]
02/28/14	31.35	15,287.00	479,247.45
02/27/14	31.65	4,041.00	127,897.65
02/26/14	31.7	55,232.00	1,750,854.40
02/25/14	31.25	10,871.00	339,718.75
02/24/14	31.35	24,180.00	758,043.00
02/21/14	31.6	693,511.00	21,914,947.60
02/20/14	31.42	355,837.00	11,180,398.54
02/19/14	31.3	999,185.00	31,274,490.50
02/18/14	31.05	51,954.00	1,613,171.70
02/17/14			-
02/14/14	30.9	874,361.00	27,017,754.90
02/13/14	30.25	586,837.00	17,751,819.25
02/12/14	30.4	518,162.00	15,752,124.80
02/11/14	30.36	375,659.00	11,405,007.24
02/10/14	29.9	340,616.00	10,184,418.40
02/07/14	31.02	551,517.00	17,108,057.34
02/06/14	30.15	237,147.00	7,149,982.05
02/05/14	30.15	247,373.00	7,458,295.95
02/04/14	30.15	37,254.00	1,123,208.10
02/03/14	29.5	89,968.00	2,654,056.00
01/31/14	30.85	217,252.00	6,702,224.20
01/30/14	31.7	308,933.00	9,793,176.10
01/29/14	31.35	238,259.00	7,469,419.65
01/28/14	31.75	185,773.00	5,898,292.75
01/27/14	31.6	130,128.00	4,112,044.80
01/24/14	31.7	1,449,144.00	45,937,864.80
01/23/14	32.35	217,479.00	7,035,445.65
01/22/14	31.95	106,798.00	3,412,196.10
01/21/14	31.78	149,395.00	4,747,773.10
01/20/14			-
01/17/14	31.86	13,773.00	438,807.78
01/16/14	31.91	14,228.00	454,015.48
01/15/14	32.05	221,751.00	7,107,119.55
01/14/14	32.35	108,527.00	3,510,848.45
01/13/14	32.15	284,802.00	9,156,384.30
01/10/14	31.92	12,970.00	414,002.40
01/09/14	32	884,791.00	28,313,312.00
01/08/14	32.15	106,509.00	3,424,264.35
01/07/14	31.75	17,006.00	539,940.50
01/06/14	31.85	15,427.00	491,349.95
01/03/14	31.28	113,553.00	3,551,937.84
01/02/14	32.1	18,546.00	595,326.60

Date	Last Price	Volume	Mkt Value[1]
01/01/14			-
12/31/13	32.15	81,254.00	2,612,316.10
12/30/13	32.05	10,370.00	332,358.50
12/27/13	32.45	45,044.00	1,461,677.80
12/26/13	32.75	6,627.00	217,034.25
12/25/13			-
12/24/13	32.56	1,442.00	46,951.52
12/23/13	32.53	18,069.00	587,784.57
12/20/13	31.854294	509,172.00	16,219,314.58
12/19/13	31.14850278	110,217.00	3,433,094.53
12/18/13	31.7918346	467,055.00	14,848,535.31
12/17/13	31.854294	763,519.00	24,321,358.70
12/16/13	31.70439144	94,609.00	2,999,520.77
12/13/13	31.1984703	126,568.00	3,948,727.99
12/12/13	30.96737052	171,567.00	5,312,978.86
12/11/13	30.9798624	475,386.00	14,727,392.87
12/10/13	31.0735515	323,914.00	10,065,158.36
12/09/13	31.5107673	65,970.00	2,078,765.32
12/06/13	30.8549436	59,413.00	1,833,184.76
12/05/13	30.0742011	200,869.00	6,040,974.70
12/04/13	29.5745259	729,138.00	21,563,910.67
12/03/13	29.0748507	198,080.00	5,759,146.43
12/02/13	29.53080432	120,855.00	3,568,945.36
11/29/13	29.2934586	6,821.00	199,810.68
11/28/13			-
11/27/13	29.355918	495,386.00	14,542,510.79
11/26/13	28.6064052	538,986.00	15,418,451.91
11/25/13	28.6376349	132,082.00	3,782,516.09
11/22/13	28.87498062	101,638.00	2,934,795.28
11/21/13	29.1060804	327,410.00	9,529,621.78
11/20/13	28.64388084	71,133.00	2,037,525.18
11/19/13	28.55643768	55,965.00	1,598,161.03
11/18/13	28.6376349	120,222.00	3,442,873.74
11/15/13	28.5751755	332,708.00	9,507,189.49
11/14/13	28.3565676	179,315.00	5,084,757.92
11/13/13	28.5751755	697,878.00	19,941,986.33
11/12/13	27.9505815	211,380.00	5,908,193.92
11/11/13	28.0130409	162,008.00	4,538,336.73
11/08/13	26.545245	3,683,129.00	97,769,561.67
11/07/13	22.173087	352,719.00	7,820,869.07
11/06/13	22.4541543	367,401.00	8,249,678.74
11/05/13	22.6415325	118,228.00	2,676,863.10

Date	Last Price	Volume	Mkt Value[1]
11/04/13	22.6727622	11,430.00	259,149.67
11/01/13	22.66651626	516,707.00	11,711,947.62
10/31/13	22.6727622	356,034.00	8,072,274.22
10/30/13	22.6103028	744,404.00	16,831,199.85
10/29/13	22.07315196	372,784.00	8,228,517.88
10/28/13	21.86079	376,229.00	8,224,663.16
10/25/13	21.6421821	16,319.00	353,178.77
10/24/13	21.6734118	255,072.00	5,528,280.49
10/23/13	21.41108232	161,699.00	3,462,150.60
10/22/13	21.6734118	361,007.00	7,824,253.37
10/21/13	21.4548039	130,592.00	2,801,825.75
10/18/13	21.6421821	380,890.00	8,243,290.74
10/17/13	21.6421821	266,051.00	5,757,924.19
10/16/13	21.3611148	85,146.00	1,818,813.48
10/15/13	21.236196	32,050.00	680,620.08
10/14/13	21.4860336	85,242.00	1,831,512.48
10/11/13	21.4235742	233,483.00	5,002,040.37
10/10/13	21.2049663	19,226.00	407,686.68
10/09/13	21.0175881	128,155.00	2,693,509.00
10/08/13	21.0488178	73,371.00	1,544,372.81
10/07/13	21.4235742	8,895.00	190,562.69
10/04/13	21.6421821	196,538.00	4,253,511.19
10/03/13	21.5824553	55,855.00	1,205,488.04
10/02/13	21.89826564	284,009.00	6,219,304.53
10/01/13	21.86079	661,663.00	14,464,475.89
09/30/13	22.1418573	75,972.00	1,682,161.18
09/27/13	22.4229246	2,088,605.00	46,832,632.43
09/26/13	20.7989802	153,689.00	3,196,574.47
09/25/13	20.8302099	87,672.00	1,826,226.16
09/24/13	20.93014494	39,796.00	832,936.05
09/23/13	20.66781546	45,024.00	930,547.72
09/20/13	20.4866832	98,059.00	2,008,903.67
09/19/13	20.5803723	12,118.00	249,392.95
09/18/13	20.7677505	35,091.00	728,761.13
09/17/13	20.4242238	27,820.00	568,201.91
09/16/13	20.1743862	25,143.00	507,244.59
09/13/13	20.1431565	84,977.00	1,711,705.01
09/12/13	20.14940244	2,753.00	55,471.30
09/11/13	20.16814026	390,580.00	7,877,272.22
09/10/13	20.2680753	33,090.00	670,670.61
09/09/13	20.0806971	435,404.00	8,743,215.84
09/06/13	19.78713792	59,326.00	1,173,891.74

Date	Last Price	Volume	Mkt Value[1]
09/05/13	19.72467852	41,038.00	809,461.36
09/04/13	19.4873328	25,513.00	497,180.32
09/03/13	18.6753606	233,254.00	4,356,102.56
09/02/13			-
08/30/13	18.8002794	42,907.00	806,663.59
08/29/13	18.9251982	32,972.00	624,001.64
08/28/13	18.7690497	27,949.00	524,576.17
08/27/13	18.84400098	28,411.00	535,376.91
08/26/13	19.2999546	30,710.00	592,701.61
08/23/13	19.19377362	237,786.00	4,564,010.65
08/22/13	19.53730032	144,728.00	2,827,594.40
08/21/13	19.46234904	5,189.00	100,990.13
08/20/13	19.7371704	257,408.00	5,080,505.56
08/19/13	19.71218664	27,013.00	532,485.30
08/16/13	19.674711	18,338.00	360,794.85
08/15/13	19.6122516	10,658.00	209,027.38
08/14/13	20.06195928	3,921.00	78,662.94
08/13/13	20.1119268	18,100.00	364,025.88
08/12/13	20.1743862	282,936.00	5,708,060.13
08/09/13	20.18687808	368,708.00	7,443,063.44
08/08/13	20.21186184	73,819.00	1,492,019.43
08/07/13	20.2056159	40,609.00	820,529.86
08/06/13	20.2368456	10,807.00	218,699.59
08/05/13	20.611602	9,951.00	205,106.05
08/02/13	20.65532358	25,148.00	519,440.08
08/01/13	20.4866832	35,672.00	730,800.96
07/31/13	20.3929941	18,322.00	373,640.44
07/30/13	20.43671568	14,373.00	293,736.91
07/29/13	20.34302658	94,369.00	1,919,751.08
07/26/13	20.5491426	35,044.00	720,124.15
07/25/13	20.85519366	61,373.00	1,279,945.80
07/24/13	20.81147208	33,474.00	696,643.22
07/23/13	20.5803723	20,919.00	430,520.81
07/22/13	20.55538854	6,976.00	143,394.39
07/19/13	20.3617644	8,814.00	179,468.59
07/18/13	20.59286418	266,095.00	5,479,658.19
07/17/13	20.5491426	70,657.00	1,451,940.77
07/16/13	20.38674816	7,805.00	159,118.57
07/15/13	20.7365208	5,188.00	107,581.07
07/12/13	20.7365208	16,066.00	333,152.94
07/11/13	20.49917508	52,907.00	1,084,549.86
07/10/13	20.03697552	45,486.00	911,401.87

Date	Last Price	Volume	Mkt Value[1]
07/09/13	19.987008	10,826.00	216,379.35
07/08/13	19.7684001	136,464.00	2,697,674.95
07/05/13	19.7371704	8,477.00	167,311.99
07/04/13			-
07/03/13	19.48108686	29,296.00	570,717.92
07/02/13	19.62474348	13,233.00	259,694.23
07/01/13	19.362414	89,627.00	1,735,395.08
06/28/13	19.1750358	43,112.00	826,674.14
06/27/13	19.0188873	12,463.00	237,032.39
06/26/13	18.8002794	54,354.00	1,021,870.39
06/25/13	18.61914714	17,652.00	328,665.19
06/24/13	18.6753606	175,593.00	3,279,262.59
06/21/13	18.87523068	151,487.00	2,859,352.07
06/20/13	19.0188873	8,175.00	155,479.40
06/19/13	19.4561031	12,101.00	235,438.30
06/18/13	19.5185625	107,706.00	2,102,266.29
06/17/13	19.362414	63,949.00	1,238,207.01
06/14/13	19.1438061	87,854.00	1,681,859.94
06/13/13	19.50607062	154,105.00	3,005,983.01
06/12/13	19.4248734	177,565.00	3,449,177.65
06/11/13	19.69344882	113,679.00	2,238,731.57
06/10/13	19.9557783	56,645.00	1,130,395.06
06/07/13	20.0494674	110,707.00	2,219,616.39
06/06/13	19.78713792	96,727.00	1,913,950.49
06/05/13	19.5810219	88,348.00	1,729,944.12
06/04/13	19.77464604	179,207.00	3,543,754.99
06/03/13	19.7371704	23,016.00	454,270.71
05/31/13	19.674711	44,400.00	873,557.17
05/30/13	19.84335138	143,140.00	2,840,377.32
05/29/13	19.362414	90,588.00	1,754,002.36
05/28/13	19.7684001	171,941.00	3,398,998.48
05/27/13			-
05/24/13	19.4873328	17,339.00	337,890.86
05/23/13	19.050117	17,471.00	332,824.59
05/22/13	19.362414	183,536.00	3,553,700.02
05/21/13	19.44361122	360,238.00	7,004,327.62
05/20/13	19.61849754	16,048.00	314,837.65
05/17/13	19.674711	253,087.00	4,979,413.58
05/16/13	19.4248734	96,420.00	1,872,946.29
05/15/13	19.362414	78,274.00	1,515,573.59
05/14/13	19.1438061	379,194.00	7,259,216.41
05/13/13	18.80652534	18,503.00	347,977.14

Date	Last Price	Volume	Mkt Value[1]
05/10/13	18.9876576	237,661.00	4,512,625.69
05/09/13	19.24998708	80,085.00	1,541,635.22
05/08/13	19.61849754	10,642.00	208,780.05
05/07/13	19.33743024	402,611.00	7,785,462.13
05/06/13	19.4873328	34,124.00	664,985.74
05/03/13	19.5810219	325,786.00	6,379,222.80
05/02/13	19.05636294	97,577.00	1,859,462.73
05/01/13	18.73782	16,867.00	316,050.81
04/30/13	19.0813467	37,712.00	719,595.75
04/29/13	18.9251982	10,017.00	189,573.71
04/26/13	18.73782	12,925.00	242,186.32
04/25/13	18.73782	17,900.00	335,406.98
04/24/13	18.4879824	34,181.00	631,937.73
04/23/13	18.0819963	33,522.00	606,144.68
04/22/13	17.8633884	9,919.00	177,186.95
04/19/13	17.8633884	5,574.00	99,570.53
04/18/13	17.7384696	7,059.00	125,215.86
04/17/13	17.8633884	221,289.00	3,952,971.36
04/16/13	17.86963434	255,601.00	4,567,496.41
04/15/13	17.6447805	978,103.00	17,258,412.74
04/12/13	18.113226	268,571.00	4,864,687.22
04/11/13	18.113226	48,498.00	878,455.23
04/10/13	17.4574023	99,896.00	1,743,924.66
04/09/13	16.93274334	32,343.00	547,655.72
04/08/13	16.864038	3,759.00	63,391.92
04/05/13	16.8328083	26,398.00	444,352.47
04/04/13	16.8952677	9,850.00	166,418.39
04/03/13	16.864038	19,684.00	331,951.72
04/02/13	17.1138756	13,348.00	228,436.01
04/01/13	16.7391192	4,343.00	72,697.99
03/29/13			-
03/28/13	16.864038	10,210.00	172,181.83
03/27/13	16.8952677	44,835.00	757,499.33
03/26/13	16.864038	5,801.00	97,828.28
03/25/13	16.864038	14,710.00	248,070.00
03/22/13	16.551741	17,570.00	290,814.09
03/21/13	17.0514162	63,088.00	1,075,739.75
03/20/13	17.3324835	32,028.00	555,124.78
03/19/13	16.6766598	5,227.00	87,168.90
03/18/13	16.71413544	133,976.00	2,239,293.01
03/15/13	16.864038	763,332.00	12,872,859.85
03/14/13	16.9264974	179,468.00	3,037,764.64

Date	Last Price	Volume	Mkt Value[1]
03/13/13	16.6454301	293,558.00	4,886,399.17
03/12/13	16.8015786	556,453.00	9,349,288.82
03/11/13	16.9577271	456,502.00	7,741,236.34
03/08/13	16.9264974	201,985.00	3,418,898.58
03/07/13	16.3955925	37,403.00	613,244.35
03/06/13	16.25193588	300,202.00	4,878,863.66
03/05/13	16.24568994	369,448.00	6,001,937.66
03/04/13	15.927147	1,576,825.00	25,114,323.57
03/01/13	14.82161562	64,637.00	958,024.77
02/28/13	14.4281214	15,967.00	230,373.81
02/27/13	14.5842699	49,009.00	714,760.48
02/26/13	14.23449726	94,756.00	1,348,804.02
02/25/13	14.3032026	106,501.00	1,523,305.38
02/22/13	14.365662	66,500.00	955,316.52
02/21/13	14.10957846	134,830.00	1,902,394.46
02/20/13	14.5530402	17,270.00	251,331.00
02/19/13	14.5530402	19,065.00	277,453.71
02/18/13			-
02/15/13	14.7404184	93,630.00	1,380,145.37
02/14/13	15.1151748	89,558.00	1,353,684.82
02/13/13	15.2400936	107,872.00	1,643,979.38
02/12/13	14.990256	76,934.00	1,153,260.36
02/11/13	14.8028778	35,511.00	525,664.99
02/08/13	14.8028778	13,422.00	198,684.23
02/07/13	14.65922118	3,766.00	55,206.63
02/06/13	14.73417246	24,263.00	357,495.23
02/05/13	14.64048336	60,366.00	883,787.42
02/04/13	14.39064576	31,004.00	446,167.58
02/01/13	14.5842699	14,529.00	211,894.86
01/31/13	14.5842699	253,937.00	3,703,485.75
01/30/13	14.5842699	15,908.00	232,006.57
01/29/13	14.64048336	83,029.00	1,215,584.69
01/28/13	14.5530402	7,591.00	110,472.13
01/25/13	14.5530402	225,964.00	3,288,463.18
01/24/13	14.31569448	47,350.00	677,848.13
01/23/13	14.25948102	277,422.00	3,955,893.74
01/22/13	14.1470541	26,706.00	377,811.23
01/21/13			-
01/18/13	14.365662	6,488.00	93,204.42
01/17/13	14.4281214	26,231.00	378,464.05
01/16/13	14.365662	160,050.00	2,299,224.20
01/15/13	14.82161562	45,939.00	680,890.20

Date	Last Price	Volume	Mkt Value[1]
01/14/13	14.5842699	49,955.00	728,557.20
01/11/13	14.5530402	17,604.00	256,191.72
01/10/13	14.5218105	63,677.00	924,705.33
01/09/13	14.2407432	56,574.00	805,655.81
01/08/13	14.053365	34,426.00	483,801.14
01/07/13	13.9284462	16,817.00	234,234.68
01/04/13	13.9909056	17,594.00	246,155.99
01/03/13	13.8347571	133,507.00	1,847,036.92
01/02/13	13.4600007	272,625.00	3,669,532.69
01/01/13			-
12/31/12	13.2413928	32,306.00	427,776.44
12/28/12	13.0227849	27,291.00	355,404.82
12/27/12	13.20391716	200,901.00	2,652,680.16
12/26/12	13.0227849	7,171.00	93,386.39
12/25/12			-
12/24/12	13.116474	4,545.00	59,614.37
12/21/12	13.11022806	15,997.00	209,724.32
12/20/12	13.25388468	25,438.00	337,152.32
12/19/12	13.428771	470,031.00	6,311,938.66
12/18/12	12.1171236	139,109.00	1,685,600.95
12/17/12	11.8985157	7,577.00	90,155.05
12/14/12	12.07340202	12,902.00	155,771.03
12/13/12	12.2420424	173,652.00	2,125,855.15
12/12/12	12.3045018	27,129.00	333,808.83
12/11/12	12.179583	45,773.00	557,496.05
12/10/12	12.0546642	145,238.00	1,750,795.32
12/07/12	11.9297454	34,813.00	415,310.23
12/06/12	11.867286	6,891.00	81,777.47
12/05/12	11.90476164	167,170.00	1,990,119.00
12/04/12	11.98283589	62,512.00	749,071.04
12/03/12	12.06091014	89,642.00	1,081,164.11
11/30/12	12.179583	8,934.00	108,812.39
11/29/12	12.26078022	190,373.00	2,334,121.51
11/28/12	12.0234345	180,905.00	2,175,099.42
11/27/12	11.94223728	220,729.00	2,635,998.09
11/26/12	11.9609751	132,677.00	1,586,946.29
11/23/12	11.8985157	27,829.00	331,123.79
11/22/12			-
11/21/12	11.98595886	37,362.00	447,819.39
11/20/12	12.02968044	227,421.00	2,735,801.96
11/19/12	12.0858939	114,225.00	1,380,511.23
11/16/12	11.867286	58,598.00	695,399.23

Date	Last Price	Volume	Mkt Value[1]
11/15/12	12.03592638	184,191.00	2,216,909.32
11/14/12	12.04217232	63,314.00	762,438.10
11/13/12	12.0858939	19,847.00	239,868.74
11/12/12	12.0234345	5,860.00	70,457.33
11/09/12	12.179583	55,902.00	680,863.05
11/08/12	12.2732721	20,972.00	257,395.06
11/07/12	12.3357315	40,966.00	505,345.58
11/06/12	12.5543394	325,424.00	4,085,483.34
11/05/12	12.31699368	187,477.00	2,309,153.02
11/02/12	12.34197744	47,869.00	590,798.12
11/01/12	12.5231097	390,791.00	4,893,918.56
10/31/12	12.4606503	193,717.00	2,413,839.79
10/30/12			-
10/29/12			-
10/26/12	11.72362938	258,435.00	3,029,796.16
10/25/12	11.70489156	17,036.00	199,404.53
10/24/12	11.66741592	104,668.00	1,221,205.09
10/23/12	11.5862187	42,292.00	490,004.36
10/22/12	11.87353194	15,616.00	185,417.07
10/19/12	11.9609751	7,909.00	94,599.35
10/18/12	12.1171236	252,748.00	3,062,578.76
10/17/12	12.0234345	108,111.00	1,299,865.53
10/16/12	11.99845074	81,103.00	973,110.35
10/15/12	11.87977788	111,684.00	1,326,781.11
10/12/12	11.7735969	69,101.00	813,567.32
10/11/12	11.7111375	371,231.00	4,347,537.29
10/10/12	11.554989	102,144.00	1,180,272.80
10/09/12	11.53625118	301,848.00	3,482,194.35
10/08/12	11.44256208	24,397.00	279,164.19
10/05/12	11.6799078	48,355.00	564,781.94
10/04/12	11.28016764	38,077.00	429,514.94
10/03/12	11.32388922	55,148.00	624,489.84
10/02/12	11.0553138	409,648.00	4,528,787.19
10/01/12	10.6493277	242,842.00	2,586,104.04
09/28/12	10.4931792	166,884.00	1,751,143.72
09/27/12	10.2745713	45,152.00	463,917.44
09/26/12	10.25583348	21,305.00	218,500.53
09/25/12	10.3682604	156,915.00	1,626,935.58
09/24/12	10.5244089	65,162.00	685,791.53
09/21/12	10.44321168	179,761.00	1,877,282.17
09/20/12	10.28081724	56,448.00	580,331.57
09/19/12	10.305801	295,673.00	3,047,147.10

Date	Last Price	Volume	Mkt Value[1]
09/18/12	10.13091468	133,344.00	1,350,896.69
09/17/12	10.01848776	71,018.00	711,492.96
09/14/12	9.993504	36,554.00	365,302.55
09/13/12	9.9310446	124,147.00	1,232,909.39
09/12/12	9.8061258	29,693.00	291,173.29
09/11/12	9.84360144	132,745.00	1,306,688.87
09/10/12	9.6187476	51,416.00	494,557.53
09/07/12	9.6187476	138,980.00	1,336,813.54
09/06/12	9.36266406	806,904.00	7,554,771.08
09/05/12	9.11282646	134,493.00	1,225,611.37
09/04/12	9.06285894	46,677.00	423,027.07
09/03/12			-
08/31/12	8.94418608	6,577.00	58,825.91
08/30/12	8.9629239	15,897.00	142,483.60
08/29/12	8.90671044	169,297.00	1,507,879.36
08/28/12	8.9004645	51,816.00	461,186.47
08/27/12	8.82551322	171,866.00	1,516,805.66
08/24/12	8.8380051	101,377.00	895,970.44
08/23/12	9.0878427	41,523.00	377,354.49
08/22/12	9.3064506	22,325.00	207,766.51
08/21/12	9.36891	40,733.00	381,623.81
08/20/12	9.4001397	106,813.00	1,004,057.12
08/17/12	9.8061258	202,760.00	1,988,290.07
08/16/12	9.36266406	73,140.00	684,785.25
08/15/12	8.9004645	91,026.00	810,173.68
08/14/12	8.9316942	8,671.00	77,446.72
08/13/12	8.86298886	28,010.00	248,252.32
08/10/12	8.9316942	119,522.00	1,067,533.95
08/09/12	8.94418608	257,179.00	2,300,256.83
08/08/12	8.8380051	217,473.00	1,922,027.48
08/07/12	8.70684036	226,367.00	1,970,941.33
08/06/12	8.66311878	328,648.00	2,847,116.66
08/03/12	8.9004645	64,142.00	570,893.59
08/02/12	8.4944784	102,459.00	870,335.76
08/01/12	8.6818566	186,654.00	1,620,503.26
07/31/12	8.83175916	578,403.00	5,108,315.99
07/30/12	8.8692348	118,291.00	1,049,150.65
07/27/12	8.50072434	282,630.00	2,402,559.72
07/26/12	8.53195404	79,694.00	679,945.55
07/25/12	8.3695596	261,998.00	2,192,807.88
07/24/12	7.8386547	129,813.00	1,017,559.28
07/23/12	7.91360598	347,363.00	2,748,893.91

Date	Last Price	Volume	Mkt Value[1]
07/20/12	7.80117906	116,866.00	911,692.59
07/19/12	7.81367094	213,889.00	1,671,258.26
07/18/12	7.8386547	515,218.00	4,038,616.00
07/17/12	7.75121154	72,449.00	561,567.52
07/16/12	7.7137359	132,933.00	1,025,410.05
07/13/12	7.6512765	78,845.00	603,264.90
07/12/12	7.60130898	298,563.00	2,269,469.61
07/11/12	7.58257116	42,480.00	322,107.62
07/10/12	7.65752244	42,645.00	326,555.04
07/09/12	7.6512765	32,173.00	246,164.52
07/06/12	7.5888171	60,637.00	460,163.10
07/05/12	7.67001432	199,444.00	1,529,738.34
07/04/12			-
07/03/12	7.7761953	136,254.00	1,059,537.71
07/02/12	7.7449656	96,620.00	748,318.58
06/29/12	7.6512765	141,984.00	1,086,358.84
06/28/12	7.64503056	185,345.00	1,416,968.19
06/27/12	7.6512765	254,688.00	1,948,688.31
06/26/12	7.53260364	182,413.00	1,374,044.83
06/25/12	7.6200468	426,035.00	3,246,406.64
06/22/12	7.73871966	164,342.00	1,271,796.67
06/21/12	7.8386547	2,138,184.00	16,760,486.06
06/20/12	7.6825062	2,217,616.00	17,036,848.67
06/19/12	7.6825062	1,650,640.00	12,681,052.03
06/18/12	6.7143855	1,255,946.00	8,432,905.61
06/15/12	6.558237	298,605.00	1,958,322.36
06/14/12	7.8698844	159,513.00	1,255,348.87

Source: Bloomberg Finance L.P.

[1] Based on closing prices of GUC Trust Units on relevant day.