

Ontario Superior Court of Justice / Superior Court of Québec

**NOTICE OF CLASS ACTION CERTIFICATION/AUTHORIZATION AND
SETTLEMENT APPROVAL HEARING**

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

This is not a solicitation from a lawyer.

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

Please Read this Notice Carefully

- This Notice is to inform you that the Ontario Superior Court of Justice and the Superior Court of Québec (the “**Courts**”) have certified/authorized for settlement purposes class actions seeking compensation for economic loss claims by current and former owners or lessees of certain GM vehicles that were recalled in 2014 (the “**Settlement**”). The recalls involved the Delta ignition system, key rotation, Camaro knee-key and electric power steering. Settlement Class Representatives claim that consumers overpaid when they bought or leased these vehicles. General Motors LLC (“**New GM**”) and General Motors of Canada Company (formerly General Motors of Canada Limited) (“**GM Canada**”) deny these allegations. Settlement Class Representatives, New GM and GM Canada have agreed to the Settlement to avoid the risk and cost of further litigation.
- The proposed Settlement does not apply to claims for personal injury (and related family/dependent claims), wrongful death or actual physical property damage relating to the 2014 recalls. These *class* claims have been discontinued from the class actions as such claims may be pursued individually (not in a class action) if permitted in your province, and any such *individual* claims will not be waived or released by the approval of the Settlement. As a result of the discontinuance in the class actions, the limitation periods (legal deadlines for commencing a lawsuit) are no longer suspended and began to run again. After the limitation period, your right to sue will be extinguished. Get advice from your own lawyer about legal deadlines for individual lawsuits.
- Subject to court approval, the Settlement will establish a settlement fund of CA\$12 million (the “**Settlement Fund Amount**”) to pay claims to eligible Settlement Class Members who submit a claim online or by mail before the deadline which will be posted on the Settlement Website. Payment

amounts to eligible Settlement Class Members will vary depending on which recalls apply to their vehicles, the amount of administrative expenses, the number and type of eligible vehicles for which claims are filed, and the number of eligible Settlement Class Members who file claims.

- The Settlement Class Representatives, who are among the persons suing New GM and GM Canada, will file motions in the Ontario Superior Court of Justice and the Superior Court of Québec seeking orders approving the Settlement (the “**Approval Orders**”). Settlement Approval Hearings have been scheduled for **July 30, 2024 at 10:00 a.m.** (Eastern Time) before the Ontario Superior Court of Justice (virtual only) and for **July 31, 2024 at 9:30 a.m.** (Eastern Time) before the Superior Court of Québec (virtual or in-person). These hearings are public. When available, the Teams/Zoom links for virtual attendance at the Settlement Approval Hearings will be posted at www.GMIgnitionSwitchSettlement.ca. You may appear at the Settlement Approval Hearings at your own cost, either yourself or through a lawyer hired by you, but you do not have to do so.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
File a Claim	<ul style="list-style-type: none"> • <u>The claims process has not yet begun. You do not need to do anything now if you intend to file a claim if/after the settlement is approved.</u> • At this stage, the Courts only certified/authorized the class actions for settlement purposes and settlement approval is still pending. If the Settlement is approved by the Courts at the Settlement Approval Hearings, a Settlement Class Member will have to complete and submit a valid and timely claim form in order to receive a payment from the Settlement Fund Amount. • Settlement Class Members will be able to complete their claim form for payment online or by mail. • Procedures for the administration of claims and allocation of the Settlement Fund Amount to Settlement Class Members are described in the Settlement Agreement, which can be found on the Settlement Website. • More information about how to file a claim if the Settlement is approved can be found at www.GMIgnitionSwitchSettlement.ca. • You may register your email or mailing address on the Settlement Website to ensure you receive notice of court approval and the claim deadline.
Exclude Yourself or “Opt Out”	<ul style="list-style-type: none"> • Settlement Class Members who exclude themselves - or “opt out” - from the Settlement will not receive any Settlement benefits. • Only Settlement Class Members who opt out of the Settlement will retain the right to sue New GM and GM Canada and certain other released parties for economic loss claims alleged in the Actions at

	<p>their own expense. Get advice from your own lawyer about legal deadlines for individual lawsuits.</p> <ul style="list-style-type: none"> Your request to opt out must be received by July 19, 2024. Non-Québec residents may send their opt out request to the Settlement Administrator. Québec residents should send their opt out request to the following address: <p style="text-align: center;">Clerk of the Superior Court of Québec Montréal Court house Re: <i>Michael Gagnon v. General Motors of Canada et. al.</i> 500-06-000687-141 500-06-000729-158 1 Notre-Dame Street East, Room 1.120 Montréal, Québec H2Y 1B5.</p> More information about how to opt out of the Settlement can be found in paragraph 8 below and at www.GMIgnitionSwitchSettlement.ca. An opt-out form is available on this website.
<p style="text-align: center;">Object</p>	<ul style="list-style-type: none"> Settlement Class Members who do not opt out can object to the Settlement and explain why they do not like the Settlement in writing. Such objections must be received by July 19, 2024. Non-Québec residents should send their objections to the Settlement Administrator. Québec residents should send their objections to the following address: <p style="text-align: center;">Clerk of the Superior Court of Québec Montréal Court house Re: <i>Michael Gagnon v. General Motors of Canada et. al.</i> 500-06-000687-141 500-06-000729-158 1 Notre-Dame Street East, Room 1.120 Montréal, Québec H2Y 1B5.</p> Objections will be delivered to the Courts and considered at the Settlement Approval Hearings. Settlement Class Members will be bound by any Court-approved Settlement even though they objected to it. More information about how to object can be found in paragraph 10 below and at www.GMIgnitionSwitchSettlement.ca. An objection form is available on this website.
<p style="text-align: center;">Go to the Hearing</p>	<ul style="list-style-type: none"> To determine whether to approve the Settlement Agreement, Settlement Approval Hearings will be held on July 30, 2024 at 10:00 a.m. (Eastern Time) before the Ontario Superior Court of Justice (virtual only) and on July 31, 2024 at 9:30 a.m. (Eastern Time) before the Superior Court of Québec (virtual or in-person). When available, the Teams/Zoom links for virtual attendance at the Settlement Approval Hearings will be posted at www.GMIgnitionSwitchSettlement.ca.

	<ul style="list-style-type: none">• The Courts will consider objections to the Settlement and objecting Settlement Class Members may ask to speak at the hearings if they choose to do so (not required).
Do Nothing	<ul style="list-style-type: none">• Settlement Class Members who do nothing, including not filing a claim when the claims process begins, will not receive Settlement benefits, if they become available.• Settlement Class Members who do nothing (and do not-opt out of the Settlement, as described above) will give up their right to sue New GM, GM Canada and certain other released parties about the economic loss claims alleged in the Actions.

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A. BASIC INFORMATION

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

This Notice advises that the Ontario Superior Court of Justice and Superior Court of Québec respectively certified and authorized proposed class actions for settlement purposes. It also provides information about the Settlement, which pertains to all economic loss claims relating to the 2014 recalls of certain GM vehicles alleged in fifteen (15) lawsuits brought on behalf of persons who owned or leased the recalled GM vehicles. These economic loss class claims are made by current and former owners and lessees of GM vehicles subject to recalls relating to Delta ignition switches, key rotation, Camaro knee-key, and/or electric power steering with the Transport Canada recall numbers listed below.

One of the fifteen lawsuits is *Edward Oberski et al. v. General Motors LLC et. al.* filed in the Ontario Superior Court of Justice (“**Ontario Court**”) bearing Court File No. CV-14-50203-CP (“**Ontario Action**”), and two of the lawsuits are filed in the Superior Court of Québec (“**Québec Court**”), and together with the Ontario Court, the “**Courts**”), *Michael Gagnon v. General Motors of Canada et. al.*, Court File No. 500-06-000687-141 and *Michael Gagnon v. General Motors of Canada et. al.*, Court File No. 500-000729-158 (“**Québec Actions**”) (collectively, “**Actions**”).

The other twelve lawsuits being settled (the “**Related Actions**”) are as follows: (i) *George Shewchuck v. General Motors of Canada Limited, et. al.*, Court File No. QBG 1396/14, *Bradie Herbel v. General Motors of Canada Limited et. al.*, Court File No. QBG 480/14, *Dale Hall v. General Motors of Canada Limited et. al.*, Court File No. QBG 1273/15, and *Rene Fradette v. General Motors of Canada Limited et. al.*, Court File No. QBG 1181/15, each in Saskatchewan Court of Queen’s Bench, (ii) *Garth Coen v. General Motors of Canada Limited et. al.*, Court File No. 14-1262, British Columbia Supreme Court, (iii) *Holly Standingready v. General Motors of Canada Limited*, Court File No. 1403-04964, Alberta Court of Queen’s Bench, (iv) *Catherine Seeley v. General Motors of Canada Limited et. al.*, Court File No. C114-88682, Manitoba Court of Queen’s Bench, (v) *Chris Spicer v. General Motors of Canada Ltd. et. al.*, Court File No. MC-176-14, New Brunswick Court of Queen’s Bench, (vi) *Sue Brown et. al. v. General Motors of Canada Limited et. al.*, Court File No. 427140 and *Alex Mulford v. General Motors of Canada Ltd.*, Court File No. 426204, both in the Nova Scotia Supreme Court, (vii) *Meghan Dunphy v. General Motors of Canada Ltd.*, Court File No. 201401G2284CP, Newfoundland Supreme Court, and (viii) *Academie Ste Cecile International School et. al. v. General Motors of Canada Limited*, Court File No. CV-14-20629-CP, Ontario Superior Court.

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

2. What is the Settlement about?

Settlement Class Representatives in the Actions and plaintiffs in the Related Actions filed proposed class action claims against New GM and GM Canada alleging that consumers overpaid when they bought or leased GM vehicles that were subject to certain 2014 recalls. New GM and GM Canada deny these allegations. The Settlement Class Representatives, New GM and GM Canada (together the “**Parties**”) negotiated the Settlement to resolve these economic loss claims, as well as all economic loss claims for these recalls that have been or may be asserted by the

Settlement Class against New GM and GM Canada and certain other released parties. The Settlement avoids the risk and cost of a trial and provides Settlement benefits to Settlement Class Members (defined below). The Settlement Class Representatives in the Actions, the plaintiffs in the Related Actions and their lawyers think that the Settlement is in the best interests of all Settlement Class Members and that it is fair, reasonable, and adequate.

B. WHO IS INCLUDED IN THE SETTLEMENT?

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

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

A **Settlement Class Member** is a member of the Settlement Class. The **Settlement Class**, which has been certified or authorized by the Ontario Superior Court of Justice and the Superior Court of Québec for settlement purposes only, is defined as:

All Persons resident in Canada other than Excluded Persons, who, at any time on or before the **Recall Announcement Date** of the **Recall(s)** applicable to their **Subject Vehicles**, owned, purchased, and/or leased a **Subject Vehicle** in any of the provinces/territories in Canada.

“**Subject Vehicles**” means the GM motor vehicles subject to the **Recalls** as specifically defined by the vehicle identification numbers (**VINs**) provided by GM to the Settlement Administrator.

The “**Recalls**” and the “**Recall Announcement Date**” are as follows:

	Make, Model and Model Year*	GM Recall Number	Transport Canada Recall Number	Recall Announcement Date
Delta Ignition Switch Recall	2005-2010 Chevrolet Cobalt 2006-2011 Chevrolet HHR 2007-2010 Pontiac G5	13454	2014-038	September 30, 2014
	2006 Pontiac G5 Pursuit 2005-2006 Pontiac Pursuit 2006-2010 Pontiac Solstice	14063	2014-060	
	2003-2007 Saturn Ion 2007-2009 Saturn Sky	14092	2014-101	
Key Rotation Recall	2005-2009 Buick Allure 2006-2011 Buick Lucerne 2004 Buick Regal	14172	2014-273	November 30, 2014
	2003-2014 Cadillac CTS 2000-2005 Cadillac Deville 2006-2011 Cadillac DTS 2004-2006 Cadillac SRX	14497		
	2000-2013 Chevrolet Impala 2000-2007 Chevrolet Monte Carlo 1997-2005 Chevrolet Malibu	14299	2014-246	

	1999-2004 Oldsmobile Alero 1998-2002 Oldsmobile Intrigue 1999-2005 Pontiac Grand Am 2004-2008 Pontiac Grand Prix	14350	2014-284	
Camaro Knee-Key Recall	2010-2014 Chevrolet Camaro	14294	2014-243	October 31, 2014
Electric Power Steering Recall	2005-2010 Chevrolet Cobalt 2009-2010 Chevrolet HHR	14115	2014-104	February 28, 2015
	2004-2006 / 2008-2009 Chevrolet Malibu 2004-2006 Chevrolet Malibu Maxx	14116		
	2007-2010 Pontiac G5 2006 Pontiac G5 Pursuit 2005-2006 Pontiac Pursuit	14117		
	2005-2006 / 2008-2009 Pontiac G6 2008-2009 Saturn Aura 2004-2007 Saturn Ion	14118		

*Only those vehicles with a vehicle identification number that is subject to one or more of the above Recalls are included in the Settlement as a Subject Vehicle. Visit www.gmignitionswitchsettlement.ca to see if your vehicle qualifies.

The Recall Announcement Date is a certain date that is the end of the month following the month of GM's last initial notification to owners/lessees of each Recall.

Go to www.GMignitionSwitchSettlement.ca to see if your GM vehicle is covered by the Settlement. Have your vehicle identification number ready.

The Settlement Class is comprised of the four Subclasses below (the "Subclasses"):

- Subclass 1: The Delta Ignition Switch Subclass, comprised of those Settlement Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to Transport Canada Recall Nos. 2014-038, 2014-060 and 2014-101.
- Subclass 2: The Key Rotation Subclass, comprised of those Settlement Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to Transport Canada Recall Nos. 2014-273, 2014-246, 2014-284.
- Subclass 3: The Camaro Knee-Key Subclass, comprised of those Settlement Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to Transport Canada Recall No. 2014-243.
- Subclass 4: The Electric Power Steering Subclass, comprised of those Settlement Class Members who own(ed), purchase(d), and/or lease(d) a Subject Vehicle subject to Transport Canada Recall No. 2014-104.

Settlement Class Members with a Subject Vehicle covered by both the Delta Ignition Switch Recall and the Electric Power Steering Recall shall be members of both the Delta Ignition Switch Subclass and the Electric Power Steering Subclass and shall be eligible to receive settlement payments allocated to both Subclasses. Settlement Class Members with

multiple Subject Vehicles shall be members of the Subclasses applicable to each of their respective Subject Vehicles.

Québec law requires the following information to be provided to Québec Settlement Class members. For the Québec Actions, the main question of fact and law authorized by the Court for settlement purposes is:

Are the Respondents liable to pay compensatory damages to Group Members stemming from the defect?

For the Québec Actions, the principal conclusions sought by the Settlement Class Representative, and authorized by the Court for settlement purposes, are:

CONDEMN Defendants to pay damages to the Group Members equivalent to the amount of loss of (...) value of the Subject Vehicle (...);

CONDEMN Defendants to reimburse to the Group Members any (...) out of pocket expenses in relation to the defect or repair thereof;

CONDEMN Defendants to pay compensatory damages to the Group Members for the loss of use and enjoyment of the Subject Vehicles, trouble, inconvenience, and loss of time;

C. THE TERMS OF THE SETTLEMENT AGREEMENT

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

Under the proposed Settlement, each Settlement Class Member will be deemed to have waived, released, and promised not to sue for any economic loss claims that the Settlement Class Member has or may have in the future, directly or indirectly, against New GM, GM Canada and certain other released parties (the “**Released Parties**”).

The proposed Settlement does not apply to claims for personal injury (and related family/dependent claims), wrongful death or actual physical property damage relating to the 2014 recalls. These *class* claims have been discontinued from the class actions as such claims may be pursued individually (not in a class action) if permitted in your province, and any such *individual* claims will not be waived or released by the approval of the Settlement. As a result of the discontinuance in the class actions, the limitation periods (legal deadlines for commencing a lawsuit) are no longer suspended and began to run again. After the limitation period, your right to sue will be extinguished. Get advice from your own lawyer about legal deadlines for individual lawsuits.

If approved by the Courts, the Settlement will prohibit Settlement Class Members from suing or being part of any other lawsuit or claim against the Released Parties that relates to the subject matter of the Actions, Related Actions and the Recalls, including, but not limited to, those relating to the design, manufacturing, advertising, testing, marketing, functionality, servicing, sale, lease or resale of the Subject Vehicles (the “**Released Claims**”). The specifics of the Released Claims are set out in more detail in the Settlement Agreement, which is posted at www.GMIgnitionSwitchSettlement.ca. The Settlement Agreement describes the Released Claims

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

5. What might I be receiving under the Settlement Agreement?

The Settlement Agreement allows Settlement Class Members to submit a claim to the Settlement Administrator, and, if eligible, receive a payment from the Settlement Fund Amount, as described below.

i. The Settlement Fund Amount

In exchange for Settlement Class Members' release of the Released Claims, there will be a CA\$12 million settlement fund established (the "**Settlement Fund Amount**"). Settlement payments to eligible Settlement Class Members will only occur if both (i) the Approval Orders of the Ontario Court and the Québec Court and (ii) the orders dismissing the Related Actions with prejudice and without costs become Final, among other orders, and after Administrative Expenses (such as for claims administration) are deducted.

ii. How will payments for eligible claims be allocated?

A "Net Settlement Amount" shall be determined by deducting Administrative Expenses, taxes and any honoraria payments from the Settlement Fund Amount. The entire Net Settlement Amount shall be distributed to Settlement Class Members with claims determined to be eligible by the Settlement Administrator. Members of the Delta Ignition Switch Subclass shall receive twice (2x) the amount paid to members of the Camaro Knee-Key and Electric Power Steering Subclasses, and members of the Key Rotation Subclass shall receive one-and-a half times (1.5x) the amount paid to members of the Camaro Knee-Key and Electric Power Steering Subclasses. An eligible Settlement Class Member with a Subject Vehicle subject to both the Delta Ignition Switch Recall and the Electric Power Steering Recall will receive both the Delta Ignition Switch Subclass and the Electric Power Steering Subclass settlement payments. The calculation process for the Net Settlement Amount is set out in the Settlement Agreement.

iii. How do I get a payment from the Net Settlement Amount?

The claims process has not yet begun and will not begin until after the Courts approve the Settlement. If the Settlement is approved by the Courts at the Settlement Approval Hearings, you will be able to file a Claim Form online or by mail postmarked by the deadline posted on the Settlement Website to receive a payment. Claims may be submitted online at www.GMIgnitionSwitchSettlement.ca or by mail to GM Ignition Switch Economic Settlement, c/o JND Legal Administration, PO Box 8111, Vancouver Main, Vancouver, BC V6B 4E2. For certain Settlement Class Members, both a complete Claim Form and additional documentation may be required to establish eligibility. Instructions are on the Claim Form and on the Settlement Website. You may register your email or mailing address on the Settlement Website to ensure you receive notice of court approval and the claim deadline.

If you fail to submit a Claim Form by the required deadline, you will not receive a payment. Sending in a Claim Form late will be the same as doing nothing.

D. LEGAL REPRESENTATION

6. Do I have a lawyer in this Settlement?

Certain lawyers representing Settlement Class Representatives (“**Co-Lead Counsel**”), listed below, negotiated the Settlement Agreement with New GM and GM Canada. Co-Lead Counsel will file the motions in the Ontario Court and the Québec Court seeking the approval of the Settlement. You will not be charged for services performed by Co-Lead Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

If you want to contact Co-Lead Counsel, they can be reached at:

Rochon Genova LLP Attention: Jon Sloan jsloan@rochongenova.com Tel: 1-800-462-3864 or local (416) 363-1867 121 Richmond Street West Suite #900 Toronto, ON M5H 2K1	Kim Spencer McPhee Barristers P.C. Attention: Megan B. McPhee mbm@complexlaw.ca Tel: (416) 596-1414 1203-1200 Bay Street Toronto, ON M5R 2A5
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7. How will the plaintiffs’ lawyers be paid?

Co-Lead Counsel will ask the Ontario Court and the Québec Court, on behalf of all plaintiffs’ counsel who represent any person claiming in the Actions and/or the Related Actions, for approval of up to a total of CA\$4,397,500.00 as the payment by the Defendants for plaintiffs’ counsel fees, expenses, costs, disbursements and associated taxes (the “**Maximum Plaintiffs’ Counsel Fee Amount**”). This application for plaintiffs’ counsel fees will need to be approved by the Courts.

The Courts may award less than the amount requested by Co-Lead Counsel. However, under no circumstances shall the Defendants pay any amount greater than the Maximum Plaintiffs’ Counsel Fee Amount, and, if the Courts award less than the Maximum Plaintiffs’ Counsel Fee Amount, then Defendants shall pay only the lesser amount.

This amount awarded by the Courts for plaintiffs’ counsel fees, expenses, costs, disbursements and associated taxes will not come out of the Settlement Fund Amount described above.

No class member other than the Settlement Class Representatives or an intervenor in Québec (see below) will be required to pay legal costs arising from the class actions.

E. OPTING OUT OF THE SETTLEMENT

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

If you do not want to be a member of the Settlement Class and you do not want to participate in the Settlement, you can exclude yourself from--or opt out of--the Settlement Class by sending an opt out form by mail, courier, or e-mail so that it is received on or before **July 19, 2024**.

The opt out form must include:

- a. Your full name, mailing address, telephone number and email;
- b. Proof that you are a Settlement Class Member, including proof of the dates when you owned or leased the Subject Vehicle(s), and an attestation that you are not an Excluded Person;
- c. The make, model, model year, and VIN of the Subject Vehicle(s); and
- d. Your address(es) at the time you owned or leased the Subject Vehicle(s).

An opt-out form is available on the Settlement Website at www.GMIgnitionSwitchSettlement.ca.

For **non-Québec residents**, the opt out form should be sent to the Settlement Administrator through email to info@GMIgnitionSwitchSettlement.ca, or by mail or courier to GM Ignition Switch Economic Settlement, c/o JND Legal Administration, PO Box 8111, Vancouver Main, Vancouver, BC V6B 4E2.

If you are a Québec resident, your opt out form should be sent to the following address:

Clerk of the Superior Court of Québec
Montréal Court house
Re: *Michael Gagnon v. General Motors of Canada et. al.*
500-06-000687-141 | 500-06-000729-158
1 Notre-Dame Street East, Room 1.120
Montréal, Québec H2Y 1B5

9. What happens if I opt out/exclude myself from the Settlement Class?

If you exclude yourself from the Settlement Class, you will not get any money or benefits from this Settlement. By excluding yourself, however, you will retain your individual right to sue the Released Parties for the economic loss claims alleged in the Actions and Related Actions, at your own expense. Get advice from your own lawyer about legal deadlines for individual lawsuits.

F. OBJECTING TO THE SETTLEMENT

10. How do I tell the Ontario Superior Court of Justice or the Superior Court of Québec I do not like the Settlement?

If you are a Settlement Class Member, and if you do not exclude yourself from the Settlement Class by opting out, you can object to the proposed Settlement if you do not like it. You can give reasons why you think the Courts should not approve any or all terms of the Settlement, and the appropriate Court will consider your objection. The Ontario Court will consider objections of all Settlement Class Members other than those whose Subject Vehicles were released to an authorized GM dealership located in Québec for the first retail sale in Canada. The Québec court will consider objections of Settlement Class Members whose Subject Vehicles were released to an authorized GM dealership located in Québec for the first retail sale in Canada.

To object, **non-Québec residents** must deliver an objection form to the Settlement Administrator by email to info@GMIgnitionSwitchSettlement.ca or by courier or mail to GM Ignition Switch Economic Settlement, c/o JND Legal Administration, PO Box 8111, Vancouver Main, Vancouver, BC V6B 4E2 so that it is received on or before July 19, 2024.

If you are a Québec resident, your objection form should be sent by July 19, 2024 to the following address:

Clerk of the Superior Court of Québec
Montréal Court house
Re: *Michael Gagnon v. General Motors of Canada et. al.*
500-06-000687-141 | 500-06-000729-158
1 Notre-Dame Street East, Room 1.120
Montréal, Québec H2Y 1B5

Objections received after this date will not be considered.

Your signed objection form must include:

- a. Your full name, mailing address, telephone number and email;
- b. Proof that you are a Settlement Class Member, including proof of the dates when you owned or leased the Subject Vehicle(s), and a statement that you are not an Excluded Person;
- c. The make, model, model year, and VIN of the Subject Vehicle(s);
- d. A statement of the nature of and reason for the objection to the Settlement, including all factual and legal grounds for the objection, and
- e. Whether you intend to appear in person/by videoconference, if available, or through legal counsel at the Settlement Approval Hearing, and if appearing by counsel, the name, address, telephone number, and e-mail address of counsel.

An objection form is available on the Settlement Website at www.GMIgnitionSwitchSettlement.ca.

If you do not state your intention to appear in accordance with the applicable deadlines and specifications, or you do not submit an objection in accordance with the applicable deadlines and specifications, you will waive all objections and can be barred from speaking at the Settlement Approval Hearings.

Note that you do not need to obtain intervenor status to object to the Settlement Agreement and present your observations to the Courts during the Approval Hearings.

G. INTERVENOR STATUS

11. Can I intervene as a party in the file?

Note that Québec Settlement Class members may seek permission from the Superior Court of Québec to **intervene** if the intervention is considered helpful to the Class. A Québec Settlement Class member who intervenes may be required to submit to a pre-trial examination at the request of the Defendants. A Settlement Class member who does not intervene may not be subject to a pre-trial examination unless the Court considers that it would be useful for its determination of the issues of law or fact to be dealt with collectively. **It is not necessary to intervene to object to the Settlement Agreement (see above) or to attend the Approval Hearings.** Québec Settlement Class members who choose to intervene and who wish to be represented by a lawyer will have to hire their own lawyer. Québec Settlement Class members are Settlement Class Members whose Subject Vehicles are identified based on reasonably available information from GM as having been first retail sold in Québec.

H. THE APPROVAL HEARINGS IN COURT

12. When and where will the Courts decide whether to approve the Settlement?

The Ontario Superior Court of Justice and the Superior Court of Québec will hold Settlement Approval Hearings to decide whether to approve the proposed Settlement Agreement. The Settlement Approval Hearings will be held as follows:

- The Ontario Superior Court of Justice will hold a Settlement Approval Hearing at 130 Queen Street West, Toronto, ON M5H 2N5 on **July 30, 2024 at 10:00 a.m.** (Eastern Time) (virtual only); and
- The Superior Court of Québec will hold a Settlement Approval hearing at the Montreal Courthouse, 1 Notre-Dame St. East, Montreal, Québec H2Y 1B6 on **July 31, 2024 at 9:30 a.m.** (Eastern Time) (virtual or in-person).

When available, the Teams/Zoom links for virtual attendance at the Settlement Approval Hearings will be posted at www.GMIgnitionSwitchSettlement. Please note that the date or location of either hearing may be changed without notice other than an update on the Settlement Website. Settlement Class Members are encouraged to visit the Settlement Website at www.GMIgnitionSwitchSettlement.ca or call 1-888-995-0291 for the most current information.

At these hearings, the Courts will consider whether the Settlement is fair, reasonable and in the best interests of the Settlement Class. Co-Lead Counsel will answer any questions the Courts may have about the Settlement. If there are objections, the Courts will consider them at the hearings. After the hearings, the Ontario Court will decide whether to approve the Settlement with respect to all Settlement Class Members other than those whose Subject Vehicles were released to an authorized GM dealership located in Québec for the first retail sale in Canada, and the Québec court will consider objections of Settlement Class Members whose Subject Vehicles were released to an authorized GM dealership located in Québec for the first retail sale in Canada. There may be appeals after either Court's decision. There is no set timeline for either the Court's final approval

decision, or for any appeals that may be brought from that decision, so it is impossible to know exactly when and if the Settlement will become Final and when the claims period will start. Please check the Settlement Website www.GMIgnitionSwitchSettlement.ca. You may register your email and mailing address on the Settlement Website to ensure you receive notice of court approval and the claim deadline.

13. Do I have to go to the hearings?

No. Co-Lead Counsel will appear at both Settlement Approval Hearings in support of the Settlement and will answer any questions asked by the Courts. However, you are welcome to attend the hearings at your own expense.

If you object by sending an objection form, you do not have to come to court to talk about it. So long as you sent your objection form on time and complied with the other requirements for a proper objection set forth above, the appropriate Court will consider it. You may attend or you may pay your own lawyer to attend, but it is not required.

14. May I speak at the hearings?

Yes. If you submitted a proper objection form, you or your lawyer may, at your own expense, attend the appropriate Settlement Approval Hearing and speak. If you owned or leased a Subject Vehicle that was identified based on reasonably available information as having been first retail sold in Québec and wish to address the Court in respect of your objection, then you will attend the hearing before the Québec Court, and if you owned or leased a Subject Vehicle that was identified based on reasonably available information as having been first retail sold outside of Québec and wish to address the Court in respect of your objection, then you will attend the hearing before the Ontario Court. You do not need to obtain intervenor status to object to the Settlement Agreement and present your observations to the Courts during the Approval Hearings.

I. IF YOU DO NOTHING

15. What happens if I do nothing at all?

You have the right to do nothing. If you do nothing, including not submitting a claim when the claims process begins, you will not get any Settlement benefits. In addition, you can no longer be part of a class action or any other lawsuits against the Released Parties involving the Released Claims in this Settlement. Specifically, after approval by both Courts is Final, the Settlement will prohibit you from suing or being part of any other lawsuit or claim against the Released Parties that relate to the subject matter of the Actions, Related Actions and the Recalls, including, but not limited to, those relating to the design, manufacturing, advertising, testing, marketing, functionality, servicing, sale, lease or resale of the Subject Vehicles. However, Settlement Class Members will not waive or release any individual claims they may have against the Released Parties for personal injury, wrongful death or actual physical property damage arising from an accident involving a Subject Vehicle. Get advice from your own lawyer about legal deadlines for individual lawsuits.

J. GETTING MORE INFORMATION

16. How do I get more information about the Settlement?

This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement, the Approval Orders, and any additional orders entered by the Courts pertaining to the Settlement, all of which are available (or will be available once entered by the Courts) on the Settlement Website at www.GMIgnitionSwitchSettlement.ca. If there is a conflict between this Notice and the Settlement Agreement, the Settlement Agreement applies.

YOU MAY OBTAIN ADDITIONAL INFORMATION BY:		
VISITING THE SETTLEMENT WEBSITE	Please go to www.GMIgnitionSwitchSettlement.ca , where you will find answers to common questions and other detailed information to help you.	
CALL THE SETTLEMENT PHONE NUMBER	Call 1-888-995-0291.	
CONTACT CLASS COUNSEL	Rochon Genova LLP Attention: Jon Sloan jsloan@rochongenova.com Tel: 1-800-462-3864 or local (416) 363-1867 121 Richmond Street West Suite #900 Toronto, ON M5H 2K1	Kim Spencer McPhee Barristers P.C. Attention: Megan B. McPhee mbm@complexlaw.ca Tel: (416) 596-1414 1203-1200 Bay Street Toronto, ON M5R 2A5