

**NOTICE OF CANADIAN CLASS ACTIONS CERTIFICATION/AUTHORIZATION AND  
SETTLEMENT APPROVAL HEARING**

**GM Ignition Switch, Key Rotation, Camaro Knee-Key & Electric Power Steering  
Economic Settlement Information**

**If You Owned or Leased a GM Vehicle that Was Subject to Certain 2014 Recalls, You May Have  
Rights and Choices in a Proposed Settlement.**

*Pour une notice en Français, visitez [www.GMIgnitionSwitchSettlement.ca/fr](http://www.GMIgnitionSwitchSettlement.ca/fr)*

**The purpose of this Notice is to inform you of the certification/authorization of the class actions, the proposed Settlement and your legal rights.** You were sent this Notice because you may be a Settlement Class Member.

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 or former owners or lessees of certain GM vehicles that were recalled in 2014. The Courts will consider the proposed nationwide class settlement in upcoming hearings. 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**”) (collectively, “**GM**”) deny these allegations.

**YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT**

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| <b>Who Is Included?</b>   | The proposed Settlement Class, which has been certified or authorized by the Courts for settlement purposes only, includes (paraphrased) all persons resident in Canada (individuals, businesses and organizations) who, at any time on or before GM’s announcement of certain 2014 Recalls, owned, purchased, and/or leased a vehicle subject to any of the Recalls in any of the provinces/territories in Canada. Daily rental fleet businesses, governmental entities and certain other persons are not included. Go to <a href="http://www.GMIgnitionSwitchSettlement.ca">http://www.GMIgnitionSwitchSettlement.ca</a> or call 1-888-995-0291, to see if your GM vehicle is covered by the Settlement.  |
| <b>What Does the Settlement Provide?</b>                            | If approved, a settlement fund of CA\$12 million will be established. Payment amounts to eligible Settlement Class Members will vary depending on which recalls apply to their vehicles, the amount of administrative expenses, and the number of eligible settlement class members who file claims. Plaintiffs’ counsel fees and expenses will be separately paid by GM and will not be deducted from the settlement fund. 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 <i>class</i> claims have been discontinued from the class actions, but any such <i>individual</i> claims will not be released by the approval of the Settlement. Get advice from your lawyer about legal deadlines for individual lawsuits. |
| <b>Option 1: Participate in the Settlement – Do nothing for now</b> | If you are satisfied with the Settlement, you do not have to do anything for now. You will be able to submit a claim for eligible benefits if/after the Settlement is approved. You may register your email or mailing address on the Settlement Website to ensure you receive notice of court approval and the claims deadline.  |
| <b>Option 2: Opt out of the Settlement</b>                          | You may <b>opt-out</b> of the Settlement, in which case you will <u>not</u> be eligible to receive any benefits. You must take this step if you wish to exclude yourself and preserve your individual right to sue GM for economic loss. Get advice from your lawyer about legal deadlines for individual lawsuits. Your opt-out form (see below) must be sent by <b>July 19, 2024</b> . You may not opt out <i>and</i> object.   |

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|  | <b>IF YOU DO NOT OPT-OUT AND THE SETTLEMENT IS APPROVED, YOU WILL BE BOUND BY THE RELEASE, WAIVER AND COVENANT NOT TO SUE.</b>   |   |
| <b>Option 3: Object to the Settlement</b>                | If you do not opt-out and if you do not like the settlement, you may <b>object</b> to the Settlement before the Courts consider whether to approve it and, if you wish, attend an approval hearing. Your objection form (see below) must be sent by <b>July 19, 2024</b> .   |   |
| <b>Opt-Out Form, Objection Form and their submission</b> | <p>The opt-out form, objection form and further information are available at <a href="http://www.GMIgnitionSwitchSettlement.ca">www.GMIgnitionSwitchSettlement.ca</a>. <u>Non-Québec residents</u> should send their opt-out form or objection form to the Settlement Administrator (see below). <u>If you are a Québec resident</u>, your objection or opt-out form should be sent to the following address:</p> <p style="text-align: center;">Clerk of the Superior Court of Québec<br/>Montréal Court house<br/>Re: <i>Michael Gagnon v. General Motors of Canada et. al.</i><br/>500-06-000687-141   500-06-000729-158<br/>1 Notre-Dame Street East, Room 1.120<br/>Montréal, Québec H2Y 1B5</p>  |   |
| <b>Approval Hearings</b>                                 | <p>The Settlement must be approved by the Courts to become effective. Hearings to consider whether to approve the Settlement, and, potentially, plaintiffs’ counsel fees and expenses will take place before the Ontario Superior Court of Justice on July 30, 2024 at 10:00 a.m. eastern time (virtual only); and the Superior Court of Québec 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 <a href="http://www.GMIgnitionSwitchSettlement.ca">http://www.GMIgnitionSwitchSettlement.ca</a>. You may register your email or mailing address on the Settlement Website to ensure you receive notice of court approval and the claims deadline.</p> <p>You may appear at the Approval Hearings, either yourself or through a lawyer hired by you, but you do not have to do so.</p> |   |
| <b>YOU MAY SEEK ADDITIONAL INFORMATION</b>               |  |   |
| <b>Contact Class Counsel</b>                             | <p>Rochon Genova LLP<br/>Attention: Jon Sloan<br/><a href="mailto:jsloan@rochongenova.com">jsloan@rochongenova.com</a><br/>Tel: 1-800-462-3864 or local (416) 363-1867</p>   | <p>Kim Spencer McPhee Barristers P.C.<br/>Attention: Megan B. McPhee<br/><a href="mailto:mbm@complexlaw.ca">mbm@complexlaw.ca</a><br/>Tel: (416) 596-1414</p> |
| <b>Settlement Website</b>                                | See <a href="http://www.GMIgnitionSwitchSettlement.ca">www.GMIgnitionSwitchSettlement.ca</a> for the Long-Form Notice, <a href="#">important documents</a> and forms, answers to common questions and other detailed information to help you.  |   |
| <b>Settlement Administrator</b>                          | <p>The Settlement Administrator can be reached by email at <a href="mailto:info@GMIgnitionSwitchSettlement.ca">info@GMIgnitionSwitchSettlement.ca</a>, by telephone at 1-888-995-0291, or by mail at:</p> <p>GM Ignition Switch Economic Settlement<br/>c/o JND Legal Administration<br/>PO Box 8111<br/>Vancouver Main<br/>Vancouver, BC V6B 4E2</p>  |   |