

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

THIS NOTICE IS BEING SENT TO YOU BECAUSE YOU MAY OWN OR LEASE A MODEL YEAR 2003–2005 CHEVROLET — AVALANCHE, SILVERADO, SUBURBAN, TAHOE; GMC — SIERRA, YUKON, YUKON XL; OR CADILLAC — ESCALADE, ESCALADE ESV, ESCALADE EXT, MANUFACTURED ON OR BEFORE DECEMBER 31, 2004.

THIS NOTICE MAY AFFECT YOUR RIGHTS SO PLEASE READ IT CAREFULLY. THIS NOTICE RELATES TO A PROPOSED SETTLEMENT OF A CLASS ACTION AND, IF YOU ARE A CLASS MEMBER, CONTAINS IMPORTANT INFORMATION AS TO YOUR RIGHTS CONCERNING THE PROPOSED SETTLEMENT.

1. WHO IS IN THE CLASS

The proposed Class consists of all current owners and lessees of model year 2003–2005 GMT800 Platform vehicles manufactured on or before December 31, 2004, who are residents of the United States. The makes and models included are Chevrolet — Avalanche, Silverado, Suburban and Tahoe; GMC — Sierra, Yukon and Yukon XL; or Cadillac — Escalade, Escalade ESV and Escalade EXT. (These vehicles are sometimes referred to as "the Vehicles"). Owners or lessors of model year 2005 GMT800 Platform vehicles manufactured after December 31, 2004, are not in the class. Excluded is any person, firm, corporation, trust or other entity related to or affiliated with Defendant General Motors and Defendant's legal representatives, assigns and successors. Also excluded is any person who has or had an action for personal injury or death against General Motors as a result of an allegedly defective instrument cluster, speedometer or stepper motor in any of the Vehicles, the judge to whom this case is assigned and any member of the judge's immediate family.

2. CHOICES OF CLASS MEMBERS

If you are a Class Member, you have the following choices: (a) you may remain in the Class and be eligible to receive relief under the proposed settlement if it is approved by the court; (b) if you do not wish to remain in the Class, you may exclude yourself by sending a formal, written request for exclusion; or (c) you may remain in the Class and file with the Court a written objection to the proposed settlement. If you choose to remain in the class, and if the court approves the settlement, you may be able to obtain a replacement of your vehicle's instrument panel cluster if you have a verified problem with your vehicle's speedometer within certain mileage limitations. You may also be entitled to reimbursement for sums you have paid for a prior instrument panel cluster replacement, under certain conditions, and if you complete and return the enclosed claim form.

3. DESCRIPTION OF THE LAWSUIT

In Multi District Litigation No. 1896 In Re: General Motors Corp. Speedometer Products Liability Litigation (the Action), Plaintiffs have filed a Second Amended Complaint seeking certification of a class of current owners and lessees of Model Year 2003–2005 GMT800 Platform vehicles manufactured on or before December 31, 2004, who are residents of the fifty United States. Plaintiffs allege that the Vehicles have instrument panel clusters which contain speedometers that do not last for the life of the Vehicles. As a result, Plaintiffs contend, among other issues, the speedometers in the Vehicles may not register the accurate speed of the Vehicles, or may cease to function entirely. GM denies the Vehicles are defective or that it is responsible to provide instrument clusters, stepper motors, and/or speedometers that last the life of the Vehicles.

Plaintiffs, Class Counsel and GM have agreed to settle the Action pursuant to the provisions of a Settlement Agreement, and subject to court approval. GM expressly denies any wrongdoing alleged in the pleadings and neither admits nor concedes any actual or potential fault, wrongdoing or liability in connection with any facts or claims that have been or could have been alleged against it in the Action, or that Plaintiffs or any Settlement Class members have suffered damage or were harmed by the conduct alleged.

4. RELIEF AVAILABLE TO CLASS MEMBERS

Under the terms of the proposed settlement, Settlement Class Members will be entitled to various benefits, including:

4.A. SPECIAL COVERAGE CAMPAIGN: Beginning on September 28, 2007, GM began a Special Coverage Campaign to provide repairs and/or reimbursement to instrument panel clusters for current owners in the United States of certain model year 2003–2004 General Motors vehicles including Chevrolet — Avalanche, Silverado, Suburban, Tahoe; GMC — Sierra, Yukon, Yukon XL; or Cadillac — Escalade, Escalade ESV, Escalade EXT. Pursuant to the Special Coverage Campaign, GM has agreed to extend the warranty for the above-referenced owners' instrument panel clusters to 7 years/70,000 miles, whichever comes first, and to reimburse those current owners who previously paid for instrument panel cluster repairs on the Vehicles, subject to certain limitations as described in paragraph 4.D. below.

If you own a model year 2003–2004 General Motors vehicle including Chevrolet — Avalanche, Silverado, Suburban, Tahoe; GMC — Sierra, Yukon, Yukon XL; or Cadillac — Escalade, Escalade ESV, Escalade EXT, you may have already received a letter and a Reimbursement Claim Form from General Motors explaining your rights under the Special Coverage Campaign. If you own a model year 2003–2004 Chevrolet — Avalanche, Silverado, Suburban, Tahoe; GMC — Sierra, Yukon, Yukon XL; or Cadillac — Escalade, Escalade ESV, Escalade EXT, and you receive a letter and Reimbursement Claim Form from GM, you may proceed to obtain relief and/or reimbursement under the Special Coverage Campaign if you qualify for such relief and/or reimbursement without waiting until final approval of the settlement as described in paragraph 6 below. If you have already submitted a Reimbursement Claim Form under the Special Coverage Campaign, GM will process that claim form pursuant to the terms of

GM'S COUNSEL:

Jacqueline M. Jauregui
Armand K. Mines
Sedgwick, Detert, Moran & Arnold
801 S. Figueroa Street, 19th Floor
Los Angeles, CA 90017-5556

You must include in your request for exclusion (i) your name, address and telephone number; (ii) a statement that you want to be excluded from the Class; (iii) the name of the Action appearing in this Notice; and (iv) your signature. If you exclude yourself from the Class, you will not be eligible for any settlement relief or be permitted to participate in the proposed settlement. Your written request for exclusion must be postmarked no later than October 17, 2008, (twenty (20) days before the date of the fairness hearing at which the court will consider final approval of the settlement) or you will lose your right to request exclusion and you will be bound by the settlement and by all orders and judgments in this Action even if you have pending or subsequently initiate litigation against GM relating to any of the claims released in the Action.

8. FAIRNESS HEARING, DATE AND LOCATION

The Court will hold a Fairness Hearing to consider whether to approve the proposed Settlement Agreement and to determine the amount of attorneys' fees to award to Class counsel. The fairness hearing will take place on November 6, 2008, at 9:00 a.m., or as soon thereafter as may be heard on the 16th floor of the United States District Court, Western District of Washington, 700 Stewart Street, Seattle, Washington, before the Honorable John C. Coughenour.

9. YOUR RIGHT TO OBJECT AND APPEAR

If you do not exclude yourself from the settlement, you may file a written objection to the proposed settlement. Your written objection must be verified by sworn affidavit and include: (i) the objector's name, address and telephone number; (ii) the name of the Action and the case number; (iii) a statement of each objection; and (iv) a written statement detailing the specific reasons, if any, for each objection, including any legal and factual support the objector wishes to bring to the Court's attention and any evidence the objector wishes to introduce in support of the objection(s). If the objection is presented through an attorney, the written objection must also include: (i) the identity and number of Class Members represented by objector's counsel; (ii) the number of such represented Class Members who have opted out of the settlement; (iii) the number of such represented Class Members who have remained in the settlement and have not objected; (iv) the date the objector's counsel assumed representation for the objector; and (v) a list of the names of all cases where the objector's counsel has objected to a class action settlement in the last three years. Objecting Class Members who intend to testify in support of their objection either in person or by affidavit must also make themselves available for deposition by Plaintiffs' counsel or Defendants' counsel in their county of residence, between the time the objection is filed and at least ten (10) days before the date of the Fairness Hearing, and the objection must include the date when the objecting Class Member will so present for deposition. You must file your written objection with the Clerk of the Court and send copies to Class Counsel and Defendants' counsel postmarked no later than October 17, 2008, (twenty (20) days before the date of the Fairness Hearing) at the following addresses:

U.S. District Court
Seattle Clerk's Office
U.S. Courthouse
700 Stewart Street, Lobby Level
Seattle, WA 98101

COUNSEL FOR PLAINTIFFS

Michael F. Ram
Karl Olson
Levy, Ram & Olson
639 Front Street, Fourth Floor
San Francisco, CA 94111

Kim D. Stephens
Tousley Brain Stephens PLLC
1700 Seventh Avenue, Suite 2200
Seattle, WA 98101-4416

COUNSEL FOR DEFENDANT

Jacqueline M. Jauregui
Amand K. Mines
Sedgwick, Detert, Moran & Arnold
801 S. Figueroa Street, 19th Floor
Los Angeles, CA 90017-555

As a Class Member, if you file and serve a written objection as described above, you may appear at the Fairness Hearing, either in person or through an attorney paid by you, to object to the proposed settlement. If you or your attorney intend to appear, you must file a Notice of Intention to Appear with the Clerk of the Court that includes: (i) how much time you or your lawyer anticipates will be required to present the objection; (ii) the name, address and telephone number of all witnesses who will testify and a detailed summary of such testimony; and (iii) identification of all exhibits to be offered in support of your objection and attach complete copies of all such exhibits. Notices of Intention to Appear must be filed with the Court and delivered to Class Counsel and Defendants' Counsel no later than twenty (20) days before the date of the Fairness Hearing in order to be allowed to appear at the Fairness Hearing.

10. ATTORNEYS' FEES

At the Fairness Hearing, Class Counsel will apply to the Court for an award of attorneys' fees not to exceed \$2,300,000, and costs, not to exceed \$72,000. The amount of attorneys' fees awarded will be paid by GM and will not effect the relief available to Class Members.

11. ADDITIONAL INFORMATION

This Notice is only a summary of the proposed settlement. The full proposed Settlement Agreement, along with the pleadings and other papers, are on file with the Clerk of the Court, and you may inspect it at the U.S. District Court, Seattle Clerk's Office, U.S. Courthouse, 700 Stewart Street, Lobby Level, Seattle, Washington 98101, during normal business hours, or obtain a copy from Class Counsel at the above address, or by writing to additional Class Counsel:

Kevin L. Oufnac
Kahn Gauthier Swick
650 Poydras Street, Suite 2150
New Orleans, LA 70130

Gary Mason
The Mason Law Firm
1225 19th Street, N.W., Suite 500
Washington, D.C. 20036

PLEASE DO NOT CONTACT THE COURT REGARDING THIS NOTICE.

LA/749770v1

Dear General Motors Customer:

As the owner of a 2003 or 2004 model year Cadillac Escalade, Escalade ESV or Escalade EXT; Chevrolet Avalanche, Silverado, Suburban or Tahoe; or GMC Sierra, Yukon or Yukon XL vehicle, your satisfaction with our product is very important to us.

This letter is intended to make you aware that your vehicle could develop a condition where one or more of the instrument panel gauge needles may stick, flutter or become inoperative. This may cause inaccurate readings, including the speedometer and the fuel gauge.

Do not take your vehicle to your GM Dealer as a result of this letter unless you believe that your vehicle has this condition.

What We Have Done: General Motors is providing owners with a special coverage that extends the warranty on the instrument panel cluster for the condition described above. If this condition occurs on your 2003 or 2004 model year Cadillac Escalade, Escalade ESV or Escalade EXT; Chevrolet Avalanche, Silverado, Suburban or Tahoe; or GMC Sierra, Yukon or Yukon XL vehicle within seven (7) years of the date your vehicle was originally placed in service or 70,000 miles, whichever occurs first, the condition will be repaired for you at no charge.

What You Should Do: Repairs and adjustments qualifying under this special coverage must be performed by a General Motors Dealer. If you believe your vehicle has this condition, contact your GM Dealer to schedule an appointment at a time that is convenient for you. Your dealer will inspect the vehicle and if the condition is found, your dealer will replace the instrument panel cluster. When calling your dealer, please have your 17-character vehicle identification number (VIN) handy so your dealer can ensure the cluster will be available on your appointment date, if needed. Keep this letter with your other important glove box literature for future reference.

Reimbursement: The enclosed form explains what reimbursement is available and how to request reimbursement if you have paid for repairs for the special coverage condition.

We are sorry for any inconvenience you may experience; however we have taken this action in the interest of your continued satisfaction with our products.

General Motors Corporation

CUSTOMER REIMBURSEMENT PROCEDURE

If you have paid to have this condition corrected prior to this notification, you may be eligible to receive reimbursement.

If your vehicle had 70,000 miles or less at the time you paid to have this condition corrected, your request for reimbursement may include parts, labor, fees and taxes. If your vehicle had greater than 70,000 miles, but less than 80,000 miles at the time you paid to have this condition corrected, your request for reimbursement may include parts only. If your vehicle had 80,000 miles or more at the time you paid to have this condition corrected, you are not entitled to reimbursement.

Your claim will be acted upon within 60 days of receipt.

If your claim is:

- Approved, you will receive a check,
- Denied, you will receive a letter with the reason(s) for the denial, or
- Incomplete, you will receive a letter identifying the documentation that is needed to complete the claim and offered the opportunity to resubmit the claim when the missing documentation is available

Please follow the instructions on the Claim Form provided below to file a claim for reimbursement.

CUSTOMER REIMBURSEMENT CLAIM FORM

Please do NOT mail this claim form until the settlement has been approved OR if you have already submitted this form as part of the Special Coverage. To confirm settlement approval, go to www.speedometersettlement.com or call 1-866-514-0405.

This section to be completed by Claimant

Date Claim Submitted: _____

17-Digit Vehicle Identification Number (VIN): _____

Mileage at Time of Repair: _____ Date of Repair: _____

Claimant Name (Please Print): _____

Street Address or P.O. Box Number: _____

City: _____ State: _____ ZIP Code: _____

Daytime Telephone Number (Include Area Code): _____

Evening Telephone Number (Include Area Code): _____

Amount of Reimbursement Requested: \$ _____

The following documentation must accompany this form.

Original or clear copy of all receipts, invoices and/or repair orders that show:

- The name and address of the person who paid for the repair
- The Vehicle Identification Number (VIN) of the vehicle that was repaired
- What problem occurred, what repair was done, when it was done and who did it
- The total cost of the repair expense that is being claimed
- Payment for the repair in question and the date of payment
(copy of front and back of cancelled check, or copy of credit card receipt)

My signature to this document attests that all attached documents are genuine and I request reimbursement for the expense I incurred for the repair covered by this letter.

Claimant's Signature _____

Please mail this Claim Form and the required documents to:

Reimbursement Department — Settlement
P.O. Box 33170
Detroit, MI 48232-5170

Reimbursement questions should be directed to the following number: 1-800-204-0261

the Special Coverage Campaign. The proposed settlement, if approved, may provide you with relief in addition to the Special Coverage Campaign, as outlined below. A sample of the Owner Letter describing the Special Coverage Campaign is attached as Exhibit One to this Notice.

4.B. EXTENSION OF SPECIAL COVERAGE CAMPAIGN: Upon final approval of the settlement, GM will extend the Special Coverage Campaign to all model year 2005 GMT800 Platform automobiles manufactured on or before December 31, 2004. The makes and models included are Chevrolet — Avalanche, Silverado, Suburban and Tahoe; GMC — Sierra, Yukon and Yukon XL; or Cadillac — Escalade, Escalade ESV and Escalade EXT. If you are the current owner of one of the above-referenced model year 2005 vehicles manufactured before December 31, 2004, you will only be entitled to relief upon final approval of the proposed settlement.

4.C. REPLACEMENT INSTRUMENT CLUSTER PART TO BE PROVIDED FOR VEHICLES BETWEEN 70,000 AND 80,000 MILES AT NO COST: Upon the final approval of the settlement, GM will provide a replacement instrument panel cluster for the Vehicles at no cost in the event any current owner or lessee has a Vehicle that experiences a verified speedometer failure between 70,000 and 80,000 miles. Under this term, GM will provide the instrument cluster part only and will not pay for any additional costs in connection with such cluster replacement, including diagnosis or labor.

4.D. REIMBURSEMENT: As part of the Special Coverage Campaign, GM has agreed to reimburse current owners and lessees of the Vehicles who paid for an instrument panel cluster to be replaced in his/her Vehicle when the mileage on the Vehicle was between 36,000-70,000 miles. That benefit currently only applies to current owners of model year 2003 and 2004 Vehicles. Upon final approval of the proposed settlement, GM will also reimburse current owners and lessees of the Vehicles for instrument panel cluster cost only, if those owners and lessees paid for an instrument cluster to be replaced in his/her Vehicle when the mileage on the Vehicle was between 70,000-80,000 miles and if they submit a completed Reimbursement Claim Form. Such reimbursement shall be processed according to the procedures, terms and conditions outlined in the attached Customer Reimbursement Procedure and Customer Reimbursement Claim Form attached as Exhibit Two to this Notice.

In order to be entitled to relief under the proposed settlement, you must remain a member of the Class and the court must approve the settlement. If the court approves the settlement and you are entitled to reimbursement for an instrument panel cluster repair under the terms of the Agreement, you must seek an instrument panel cluster replacement according to the terms of the Special Coverage Campaign and/or complete and return the enclosed Reimbursement Claim Form and remain a member of the Class to obtain such benefits.

5. DISMISSAL AND RELEASE OF CLAIMS

If the proposed Settlement Agreement is approved by the Court, all claims asserted in this Action will be dismissed with prejudice. None of those claims may thereafter be asserted by anyone who remains in the Class. If the Court does not approve the proposed settlement, the Settlement Agreement will terminate and shall be null and void, and this Action will remain before the Court.

6. HOW WILL I KNOW IF THE SETTLEMENT HAS BEEN APPROVED?

The Court will schedule a hearing date to consider final approval of the settlement. On or after the hearing date, the Court will issue an order either granting or denying final approval of the settlement. If the Court grants final approval, and if no appeal or post-judgment motion is filed within thirty-five (35) days after entry of judgment on that order, the settlement will become final and the further benefits described in this notice, which are in addition to the Special Coverage Program, will become available. In the event the Court denies final approval, the further benefits will not become available. In the event the Court grants final approval, but an appeal is filed, the additional benefits will be postponed, and may ultimately not become available, depending upon how the appeal is decided.

If you remain in the Class and wish to know the status of final approval and the availability of benefits (in addition to the special coverage described in paragraph 4.A.), you may visit www.speedometersettlement.com to see information about the status of final approval or download another copy of the claim form attached to this notice, or you may call 1-866-514-0405 to listen to a recorded message about the status of final approval.

7. EXCLUSION FROM THE CLASS

To request exclusion, you must send a written request for exclusion to Class Counsel and GM's Counsel:

CLASS COUNSEL:

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