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	IINITED STATES	DISTRICT COURT	
19	UNITED STATES DISTRICT COURT		
20	CENTRAL DISTRICT OF CAL	IFORNIA, EASTERN DIVISION	
21	SCOTT PECKERAR and SAMANTHA	Case No.: 5:18-cv-02153	
22	PECKERAR, on behalf of themselves		
	and all others similarly situated,	<u>CLASS ACTION</u>	
23	Plaintiffs,	CLASS ACTION COMPLAINT	
24	riammis,	FOR:	
25	V.	1011	
		(1) VIOLATIONS OF THE	
26	GENERAL MOTORS LLC,	CALIFORNIA CONSUMERS	
27	Defendant.	LEGAL REMEDIES ACT ("CLRA" (CAL. CIV. CODE §§ 1750, et seq.)	
28	Defendant.	(CAL. CIV. CODE 88 1/30, et seq.)	

1		(A) XXX A T X A X A X A X A X A X A X A X A
2		(2) VIOLATION OF THE CALIFORNIA UNFAIR
3		COMPETITION LAW (CAL. BUS.
4		& PROF. CODE §§ 17200, et seq.)
5		(3) VIOLATION OF THE SONG- BEVERLY CONSUMER
6		WARRANTY ACT
7		BREACH OF IMPLIED WARRANTY
8		(CAL. CIV. CODE §§ 1791, et seq.)
9		DEMAND FOR JURY TRIAL
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CLASS ACTION COMPLAINT

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

I. NATURE OF THE ACTION

- 1. Plaintiffs bring claims under the consumer protection laws of California against Defendant GENERAL MOTORS LLC ("GM").
- 2. This action arises from the sale or lease of thousands of vehicles throughout California manufactured by Defendant GM that are equipped with defective braking systems. These defective braking systems were installed in all model year 2015 to present Cadillac Escalades, 2014 to present Chevrolet Silverados, 2015 to present Chevrolet Suburbans, 2015 to present Chevrolet Tahoes, 2014 to present GMC Sierras, and 2015 to present GMC Yukon/Yukon XLs (the "Class Vehicles") and sold or leased to consumers in California, including Plaintiffs.
- 3. The irreparable and defective braking system supplied in all of the Class Vehicles features a defective design that is prone to sudden and unexpected loss of vacuum in the brake booster, requiring replacement of the brake booster and/or the system's vacuum pump. When Class Vehicles suddenly and unexpectedly lose vacuum, the resulting brake booster failure makes Class Vehicles difficult to stop: the brake pedal becomes hard, much more force is required from the driver to slow the vehicle, and stopping distance is severely and suddenly compromised. The defective braking system common to all Class Vehicles is a clear safety hazard that was never disclosed to any member of the class prior to purchase.
- 4. Reasonable efforts undertaken by the Class to remedy this defect with or through GM have been unsuccessful.

- 5. GM sold, leased, and continues to sell and lease the Class Vehicles despite its awareness of the defect and the danger it poses to consumers and other drivers. GM chose and continues to choose financial gain at the expense of consumer safety by concealing and omitting a disclosure of this critical safety defect to consumers who purchase or lease Class Vehicles.
- 6. GM has been aware of the safety hazard posed by its defective braking system since at least 2014. GM should not have sold, leased, or marketed the Class Vehicles without a full and complete disclosure of the Class Vehicles' safety defect, and should have voluntarily recalled the Class Vehicles long ago.
- 7. Plaintiffs bring this action on behalf of themselves and all those similarly situated ("Class," "Class Members," "Consumers," "Owners") for GM's deceptive trade practices in violation of the consumer protection laws of California, and for equitable relief. Plaintiffs seek damages, injunctive and declaratory relief, restitution, disgorgement of profits, attorney's fees and costs, punitive damages, and the repair of, replacement of, or refund of money paid to own or lease all Class Vehicles in California, except that no monetary relief is presently sought for violations of the Consumers Legal Remedies Act.

II. JURISDICTION AND VENUE

- 8. Pursuant to 28 U.S.C. § 1332, this Court has original jurisdiction over the Plaintiffs' and the Class Members' claims in that diversity of citizenship exists and Plaintiffs seek to represent a Class of persons in a matter in controversy that exceeds the sum or value of \$5,000,000, exclusive of interest and costs.
- 9. This Court has general and specific jurisdiction over the Defendant because Defendant GM has sufficient minimum contacts with California and within the Central District of California to establish Defendant's presence in California, and certain material acts upon which this suit is based occurred within the Central District of California, to include but not be limited to the sale of the Defendant's defective product to the Plaintiffs.

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

III. PARTIES

- 11. Plaintiffs Scott Peckerar and Samantha Peckerar are adult citizens and reside in this judicial district and division.
- 12. Defendant GENERAL MOTORS LLC is a Delaware limited liability company whose principal place of business is in the State of Michigan. On information and belief, none of General Motors LLC's members have citizenship in the state of California. Defendant GM manufactured, distributed, sold, serviced and/or warranted the Class Vehicles made the subject of this litigation. GM distributed, sold, serviced and/or warranted, directly or indirectly, thousands of Class Vehicles to Plaintiffs and the Class Members with the understanding and expectation that those vehicles would be sold in, operate in, and be fit for their intended purpose in California.

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IV. FACTUAL BACKGROUND

A. Plaintiffs Purchased a Defective Class Vehicle.

- 13. On or about January 18, 2017, Plaintiffs purchased a new 2017 model year Chevrolet Suburban at a franchised General Motors dealership, Paradise Chevrolet, located in Riverside County, California. Plaintiffs executed all sales documents in Riverside County, California.
- 14. On April 11, 2017, Paradise Chevrolet was performing maintenance on Plaintiffs' Suburban at 7,113 miles and found a leak of engine oil. Paradise Chevrolet diagnosed the vehicle with a failed vacuum pump. The Repair Order stated: "VERIFIED ENGINE OIL LEAK PRESENT AT ENGINE VACUUM PUMP. LEAK CAUSED BY FAILING SHAFT SEAL ON VACUUM PUMP. NECESSARY TO REPLACE VACUUM PUMP ASSEMBLY TO REPAIR. REPLACED VACUUM PUMP ASSEMBLY AND ASSOCIATED GASKETS AND HARDWARE."
- 15. On April 11, 2017, Plaintiffs' Suburban was still covered by GM's express bumper-to-bumper limited warranty, and Plaintiffs had owned the vehicle for less than one year. The original repair for the Suburban's vacuum pump was replaced under warranty, but the fix failed to remedy the defect in the vehicle's braking system.
- 16. On April 5, 2018, Plaintiff Samantha Peckerar was driving the Suburban and experienced a startling issue with her brakes. She pressed her brake pedal but the pedal became hard and prevented her from stopping her vehicle, resulting in a collision with the vehicle in front of her.
- 17. Concerned for the safety of their family, Plaintiffs informed GM about the braking problem with their Suburban.
- 18. General Motors sent an investigator to visit the Plaintiffs home and inspect the Plaintiffs' Suburban. GM's representatives told Plaintiffs that no electronic data retrieved from the vehicle evidenced a defect. GM's representatives

also told Plaintiff Samantha Peckerar that she should consult her manual to understand the operation of her Suburban's brakes. Despite Plaintiffs' insistence, GM refused to do any kind of field testing of the vehicle or otherwise evaluate it for safety under driving conditions. Instead, GM attempted to induce Plaintiffs into signing a release for any claims of liability against GM or its franchised dealerships, including a promise of confidentiality, in exchange for the cost of repair to the Suburban's front bumper.

- 19. Plaintiffs were unsatisfied by GM's refusal to diagnose the brake failure that caused the collision and brought the vehicle to Paradise Chevrolet for further inspection. Unlike GM's corporate representatives, the GM dealership drove the vehicle to confirm what Plaintiffs already knew—there was a problem with the Suburban's brakes.
- 20. Paradise Chevrolet test drove the Suburban and discovered that the Suburban failed to maintain vacuum boost. The Repair Order stated: "BODY SHOP ADVISED THAT AFTER APPLYING AND RELEASING THE BRAKE PEDAL AND THEN RE-APPLYING IMMEDIATELY AFTER FOR PANIC STOP THAT BRAKE PEDAL FELT HARD AND VEHICLE DID NOT STOP AS DESIGNED. ... DROVE VEHICLE VERIFIED AFTER SECOND OR THIRD BRAKE APPLICATION THAT THE PEDAL GETS HARD AND THE BRAKE ASSIST FAILS TO PROVIDE ASSIST."
- 21. The cause of the collision was confirmed to be a *second failure* of the vacuum pump, demonstrating that GM's supposed fix for the Class Defect is ineffective and dangerous. The Repair Order states: "SLOW TO BUILD VACUUM BACK UP, REC VACUUM PUMP REPLACEMENT AND RETEST. ... ALSO SCAN TEST FOUND Code C025E brake booster sensor circuit/not plausible stored in the EBCM. ... Verified with GM technical assistance code C025E 5A is related to low vacuum. ... REPLACED VACUUM PUMP ASSEMBLY. CLEARED CODE."

B. Defendant GM Knowingly Sold Dangerously Defective Vehicles to Consumers.

- 22. In fact, Plaintiffs' dealership had been familiar with the Class Defect for at least three years when it repaired and replaced the vacuum pump in Plaintiffs' Suburban for the second time. In February of 2015, Defendant GM had issued a service bulletin #PIT5361B to all of its franchised dealerships. This bulletin affected the Class Vehicles produced to date at the time: 2015 Cadillac Escalade; 2014-2015 Chevrolet Silverado 1500; 2015 Chevrolet Suburban; 2015 Chevrolet Tahoe; 2014-2015 GMC Sierra 1500; and 2015 Yukon. (Exhibit A.)
- 23. In the bulletin, GM expressly acknowledged that "a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal" (hereinafter the "Class Defect"). As evidence of the Class Defect, Defendant GM notified its dealers, "While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line." The service bulletin was "intended for use by professional technicians ... written to inform these technicians of conditions that may occur on some vehicles." The service bulletin was not, however, written or intended for the consuming public, including Plaintiffs and any Class Members.
- 24. Since the release of the Class Vehicles (the earliest of which was Spring 2013), Defendant GM has received numerous warranty returns, customer complaints, and National Highway Traffic Safety Administration "Vehicle Owner Questionnaires" ("NHTSA VOQs") relating to the defect.
- 25. As a result, GM investigated the defect, developed a countermeasure (attempted fix), and then cascaded the countermeasure into the field through their dealerships in the form of a service bulletin effective February 2015. The service bulletin requires extensive repair to include the replacement of the Vacuum Pump, Vacuum Line Between the booster and the pump, Brake Booster, and Master Cylinder. The service campaign process does not happen overnight, especially for a

repair as extensive as the February 2015 service campaign; it takes many months to identify the problem, attempt to fix it, and implement the fix in the field. GM knew their Class Vehicles suffered from the Class Defect well before Plaintiffs purchased their 2017 Chevrolet Suburban, but GM concealed the defect from unwitting consumers who unknowingly purchased Class Vehicles with a hidden defect.

- 26. Ultimately, Defendant GM would issue a series of service bulletins only to its dealers regarding the brake defect, including bulletins for the following Class Vehicles and year models: 2015-2016 Cadillac Escalade; 2014-2016 Chevrolet Silverado 1500; 2015-2016 Chevrolet Suburban; 2015-2016 Chevrolet Tahoe; 2014-2016 GMC Sierra 1500; and 2015-2016 Yukon. (See Exhibit A.) As part of GM's overall strategy to engage in material omission and deception upon Plaintiffs and the Class Members, these bulletins contain false, misleading, or deceptive information about the potential for curing the defects because the purported repairs do not fix the defect and the statements are designed to mislead dealers and technicians who repair Class Vehicles.
- 27. Defendant GM had knowledge of the Class Defect prior to the sale of the Class Vehicle to Plaintiffs. Further, Defendant GM took no action to alert Plaintiffs or the Class Members of the defect in the Class Vehicles prior to their purchase or after their purchase.
- 28. As of February 10, 2016, GM had verified at least some 19 affected vehicle models where the "CUSTOMER WILL NEED INCREASED EFFORT TO DEPRESS THE BRAKE PEDAL. TECHNICIAN MAY FIND FLUID IN THE BRAKE BOOSTER AND/OR THE BOOSTER LINE. TECHNICIAN WILL NEED TO REPLACE VACUUM PUMP, BRAKE BOOSTER, MASTER CYLINDER, VACUUM PUMP BELT AND VACUUM LINE BETWEEN THE BOOSTER AND THE PUMP." (See Exhibit B.) The 19 affected vehicle models are the Class Vehicles which GM continued to sell without disclosure to the Class Members even after this admission.

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- 29. Disturbingly, the number of customer complaints echoed what GM already knew about its defective brake system: the need for increased effort to depress brake pedal, high occurrences in stop and go traffic, high occurrences of failure at lower speeds, brake booster issue, replacement of brake booster, replacement of master cylinder, safety issue, etc. (See Exhibit C.)
- 30. Further, Defendant GM knowingly sold thousands of Class Vehicles to unsuspecting Class Members to whom GM said nothing about the braking defect after its knowledge of the Class Defect.

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

- The National Highway Traffic Safety Administration ("NHTSA") 31. provides a system for motor vehicle owners to report complaints relating to safety defects that pose a risk of accidents in vehicles manufactured or imported in the United States, including safety defects relating to brake malfunctions. The safety defect complaints are entered into the NHTSA consumer complaint automated database, which is accessible to manufacturers and are routinely reviewed by GM soon after the submission of each complaint. NHTSA also provides these consumer complaints to the vehicle manufacturers directly, including GM. Given the vast majority of owners of Class Vehicles are not aware of NHTSA and/or its reporting system, complaints received by NHTSA form an extremely small minority of the overall number of complaints which have been made to GM directly and/or through their authorized dealerships, including through the form of warranty repairs.
- 32. Since at least 2014, GM has received complaints of braking defects and safety concerns related to the loss of vacuum boost in the Class Vehicles through NHTSA, the Better Business Bureau, internet forums, GM's franchised dealerships, and directly by owners of Class Vehicles.
- Despite Defendant GM's wealth of knowledge relating to the Class Defect in the Class Vehicle's defective braking system and its clear safety implications, GM has and continues to suppress and conceal this knowledge and has

failed to disclose that its Class Vehicles' braking systems are defective and dangerous. Consumers continue to operate Class Vehicles and continue to experience dangerous failures of the defective braking system, and are at increased risk for crashes.

- 34. Consumers have submitted individual NHTSA complaints regarding Class Vehicles consistent with a loss of brake boost as described in GM's TSBs. These consumer complaints filed with the NHTSA, and delivered to GM, often highlight the safety risk caused by the defect, including *reports of collisions and near-misses*, as well as expressions of concern for drivers' families—without concern and resolution by GM. GM received and were aware of these consumer complaints. Many of these complaints are reprinted in the paragraphs below.
- 35. A consumer complaint dated 10/9/2014 and submitted to NHTSA states the following regarding a Class Vehicle: THE ABS ENGAGES AT SLOW SPEEDS INCLUDING DRY CONDITIONS, LEADING TO TOTAL LOSS OF BRAKING AND INCREASED STOPPING DISTANCES. *TR.
- 36. A consumer complaint dated 1/15/2015 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. WHILE DRIVING AT 45 MPH, THE SERVICE BRAKE ASSIST WAS DISPLAYED ACROSS THE MESSAGE BOARD. IN ADDITION, THE CONTACT STATED THAT THE BRAKE PEDAL WAS DEPRESSED AND IT TOOK A GREATER AMOUNT OF TIME FOR THE VEHICLE TO COME TO A COMPLETE STOP. THE FAILURE RECURRED ON NUMEROUS OCCASIONS. THE VEHICLE WAS TAKEN TO A DEALER BUT WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 16,562. UPDATED 6/18/15*CN UPDATED 10/12/2017*CN.
- 37. A consumer complaint dated 11/13/2015 and submitted to NHTSA states the following regarding a Class Vehicle: THE VEHICLE HAD VIRTUALLY

- NO BRAKES TO STOP IT AND 11,215 MILES. GENERAL MOTORS ALREADY HAD SERVICE WARNINGS OUT TO DEALERS DATED 7/17/2015, GM DOCUMENT ID #4242788. THEY SAY THEY REPLACED PADS AND ROTORS. AT 23,589 MILES THE VEHICLE NEEDED BRAKES AGAIN. SERVICE MANAGER TELLS US THAT THIS IS A KNOWN PROBLEM AT GENERAL MOTORS. THEY HAVE EVEN ISSUED A NEW WARNING FOR 2016 MODELS. I CONSIDER THE VEHICLE TO BE UNSAFE TO DRIVE IN THAT THE BRAKES CAN GO OUT WITHOUT ANY WARNING.
- 38. A consumer complaint dated 1/4/2016 and submitted to NHTSA states the following regarding a Class Vehicle: THE VEHICLE HAD VIRTUALLY NO BRAKES TO STOP IT AND 11,215 MILES. GENERAL MOTORS ALREADY HAD SERVICE WARNINGS OUT TO DEALERS DATED 7/17/2015, GM DOCUMENT ID #4242788. THEY SAY THEY REPLACED PADS AND ROTORS. AT 23,589 MILES THE VEHICLE NEEDED BRAKES AGAIN. SERVICE MANAGER TELLS US THAT THIS IS A KNOWN PROBLEM AT GENERAL MOTORS. THEY HAVE EVEN ISSUED A NEW WARNING FOR 2016 MODELS. I CONSIDER THE VEHICLE TO BE UNSAFE TO DRIVE IN THAT THE BRAKES CAN GO OUT WITHOUT ANY WARNING.
- 39. A consumer complaint dated 2/10/2016 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 GMC YUKON. WHILE DRIVING VARIOUS SPEEDS, THE BRAKE PEDAL WAS APPLIED AND THE VEHICLE FAILED TO STOP. THE BRAKE PEDAL HAD TO BE PUMPED SEVERAL TIMES TO STOP THE VEHICLE. THE VEHICLE WAS TAKEN TO THE DEALER WERE IT WAS DIAGNOSED THAT THE BRAKE BOOSTER NEEDED TO BE ADJUSTED. THE VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED. THE VEHICLE WAS TAKEN BACK TO THE DEALER WHERE THE BRAKE FAILURE WAS

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DUPLICATED AND DIAGNOSED THAT THE BRAKE BOOSTERS NEEDED TO BE REPLACED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS 35,000.

- A consumer complaint dated 7/4/2016 and submitted to NHTSA states 40. following regarding a Class Vehicle: **TRAILER BRAKE ASSIST** MALFUNCTION DURING **TRAILER** TRIP WHILE **DRIVING WITH** CONNECTED ON HIGHWAY NO PROBLEM AFTER ENDING TRIP AND DISCONNECTING TRAILER BRAKE ASSIST WARNING LIGHT APPEARED AND 1ST GLANCE BRAKES SEEMED FINE BUT FINAL PEDAL PRESSURE IS VERY STIFF ALMOST CAN'T STOP SUV
- 41. A consumer complaint dated 8/2/2016 and submitted to NHTSA states the following regarding a Class Vehicle: BRAKES COMPLETELY FAILED. I PULLED INTO TRAIN PARKING SPOT AND THE CARS WOULD NOT STOP. I HAD TO KEEP PUMPING THE BRAKES AND EVENTUALLY IT JUST STOPPED. I TRIED IT GAIN AND THE BRAKES WERE HARD AND COULDN'T PUSH THEM DOWN. I AM SO LUCKY THAT I WAS NOT ON A HIGHWAY GOING FAST WITH MY KIDS IN THE CAR. CADILLAC SAID I NEEDED THE HYDRO BOOST REPLACED.
- 42. A consumer complaint dated 9/7/2016 and submitted to NHTSA states the following regarding a Class Vehicle: I AM WRITING ABOUT MY 2015 CHEVY SUBURBAN. I OWN A LIMOUSINE SERVICE AND USE THE SUBURBAN IN MY FLEET. YESTERDAY A DRIVER, WITH PASSENGERS, HAD A TOTAL FAILURE OF THE POWER BRAKING SYSTEM. IT IS AT A LOCAL REPAIR SHOP NOW, AND I AM BEING TOLD THE AIR PUMP HAD BROKEN APART, INSIDE, SNAPPED THE FAN BELT RESULTING IN NO VACUUM GETTING TO THE POWER BRAKE SYSTEM. MY DRIVER WAS BARELY ABLE TO STOP THE VEHICLE BEFORE REAR ENDING ANOTHER CAR ON THE HIGHWAY. THE VEHICLE HAS 54,000 MILES

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AND I AM BEING TOLD IS OUT OF THE BUMPER TO BUMPER WARRANTY. THERE ARE ALSO NO OPEN RECALLS. I AM REPORTING THIS ISSUE TO THE NHTSA AND THE MASSACHUSETTS ATTORNEY GENERAL'S OFFICE, AS I BELIEVE THIS IS AN IMMEDIATE DANGER TO THE GENERAL MOTORING PUBLIC. I JUST CONTACTED CHEVROLET BY PHONE AND EMAIL. THE REPRESENTATIVE ON THE PHONE SAID ALL SHE COULD TELL ME IS THAT IT'S OUT OF WARRANTY, THERE WERE NO RECALLS, AND I AM BASICALLY ON MY OWN TO REPAIR. I HOPE YOU ARE ABLE TO INVESTIGATE THIS SITUATION, IDENTIFY THE CAUSE OF THIS FAILURE, AND COME UP WITH A REMEDY FOR THE SAFETY OF EVERYONE.

A consumer complaint dated 10/14/2016 and submitted to NHTSA states the following regarding a Class Vehicle: BRAKES STOPPED WORKING. FIRST TIME IT HAPPENED I THOUGHT IT WAS MY IMAGINATION AS I WAS IN A PARKING LOT GOING EXTREMELY SLOW. NEXT DAY IT HAPPENED WHEN BACKING OUT OF MY DRIVEWAY. HAD TO PRESS BRAKES EXTREMELY HARD AND IT ROLLED TO A STOP AS IT HIT CURB ON OTHER SIDE OF ROAD. TOOK IT TO DEALER AND THEY REPLACE THE VACUUM BOOSTER WHICH HAD FAILED AT APROX. 50,000 MILES. NOT COVERED UNDER WARRANTY. EVERY OTHER PART OF BRAKES BESIDES NORMAL WEAR AND TEAR IS COVERED. I WAS LUCKY IT HAPPENED IN MY DRIVEWAY AND NOT WHILE DRIVING AT HIGHER SPEEDS IN TRAFFIC. I HAVE ADDITIONAL COMPLAINTS ABOUT THIS VEHICHLE. THE CLIPS HOLDING DRIVERS SEAT HAD TO BE REPLACED AT 40,000 MILES BECAUSE SEAT WAS SLIDING FROM SIDE TO SIDE. THEY ARE ALL READY LOOSE AGAIN AT 60,000 MILES ALTHOUGH NOT AS BAD AS FIRST TIME. MY AC CONDENSER WENT OUT AT 62,000 MILES. IT HAS BEEN ON NATIONAL BACKORDER FOR 7

- WEEKS AND I AM STILL WAITING. THE CAR SHAKES ON THE 1 INTERSTATE AT APROX 70 -75 MILES PER HOUR. THE DEALERSHIP HAS 2 3 BALANCED THE TIRES AND THIS HAS NOT FIXED PROBLEM. AFTER DRIVING ON INTERSTATE AT HIGH SPEEDS FOR EXTENDED PERIOD OF 4 TIME, WHEN STOPPING THE CAR IDLES VERY ROUGH AND HAS EVEN 5 CUT OFF. THE DEALERSHIP RAN A FUEL INDUCTION SERVICE. WILL SEE IF IT WORKS WHEN I GET IT BACK AFTER THEY REPLACE AC 7 8 CONDENSER. THE CAR SHIFTS HORRIBLY, ESPECIALLY WHEN GOING SLOW. WAS TOLD THAT IS A PROBLEM WITH THE FUEL EFFICIENT 10 SHIFTING AND THERE IS NO REPAIR...JUST TO MANUALLY SHIFT. ALSO, THE HOOD OF THE CAR HAS TINY RUST SPOTS COMING 11 12 THROUGH THE PAINT ALL OVER IT.
 - 44. A consumer complaint dated 11/28/16 and submitted to NHTSA states the following regarding a Class Vehicle: I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACED.....THIS IS VERY DANGEROUS.

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- 45. A consumer complaint dated 12/1/2016 and submitted to NHTSA states the following regarding a Class Vehicle: THE BRAKES POWER ASSIST FAILS AFTER APPLICATION OF BRAKES IN TRAFFIC OR WHEN REVERSING. WHEN IN HEAVY TRAFFIC SITUATION AND WHEN APPLYING LIGHT PRESSURE NUMEROUS TIMES, THE BRAKES POWER ASSIST FAILS AND YOU HAVE TO APPLY VERY HEAVY PRESSURE TO THE PEDAL TO STOP. REVERSING, THE BRAKES POWER ASSIST FAILS ALMOST IMMEDIATELY AFTER INITIAL BRAKE APPLICATION.
- 46. A consumer complaint dated 1/15/17 and submitted to NHTSA states the following regarding a Class Vehicle: SOME TIME WHEN I BRAKE, THE CAR DO NOT STOP IMMEDIATELY IS SLIGHTING BEFORE STOPPING BY

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- A consumer complaint dated 2/28/2017 and submitted to NHTSA 47. states the following regarding a Class Vehicle: WHILE DRIVING HER VEHICLE TODAY MY WIFE DEPRESSED HER BRAKE TO STOP AND SHE SAID THE BRAKE FELT LIKE PUSHING ON A RUBBER TIRE. THE CAR WOULD NOT STOP CAUSING HER TO RUN A STOP SIGN AND HIT ANOTHER VEHICLE. WE HAD THE SAME PROBLEM LAST MONTH AND THE VEHICLE WAS **TAKEN** TO THE **CHEVROLET** DEALERSHIP **AND** "REPAIRED" ACCORDING TO THE CURRENT SAFETY BULLETIN ISSUED BY CHEVROLET. THIS COLLISION CAUSED THE OTHER PERSON TO GO TO THE HOSPITAL VIA EMS AND MY WIFE WAS TAKEN BY POV TO ER FOR EVALUATION. OBVIOUSLY WHATEVER "FIX" WAS DONE BY THE DEALERSHIP WAS NOT THE CAUSE OF THE PROBLEM. I WAS TOLD THE VACUUM ASSIST PUMP AND HOSES WERE REPLACED, BUT THE VEHICLE STILL HAD THE SAME ISSUE.
- 48. A consumer complaint dated 4/8/2017 and submitted to NHTSA states the following regarding a Class Vehicle: I WAS ON SLOPE HILL. MY BRAKES ARE NOT RESPONDING. I PUT IN NEW BRAKES 2 MONTHS AGO AND BRAKES NOT RESPONDING? MY CAR ALMOST WENT DOWN THE HILL. I CALLED ROADSIDE ASSISTANCE AND HAD THEM TOWED MY CAR TO DEALERSHIP. THEY FOUND THE ISSUE VACUUM PUMP BROKE. ALSO MY TRANSMISSION HAVING ISSUE SINCE 2 MONTHS. THEY STILL

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- HAVEN'T FOUND ISSUES. I CAN'T CONTROL MY SPEED AND ENGINE GIVES A KICK WHEN ENTERING HIGHWAY. THEY WON'T REPAIR THIS ISSUE BECAUSE THEIR "MECHANICS" CANNOT FIND THE ISSUE. THIS IS THIS WORST VEHICLE TO DRIVE ANDUNSAFE FOR DRIVERS AND PASSENGERS.
- 49. A consumer complaint dated 6/17/2017 and submitted to NHTSA states the following regarding a Class Vehicle: BRAKE BOOSTER WENT OUT WHILE DRIVING WITH MY CHILDREN IN THE CAR!
- 50. A consumer complaint dated 6/28/2017 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2016 CHEVROLET SILVERADO 1500. WHEN THE BRAKE PEDAL WAS DEPRESSED, THE VEHICLE LOST BRAKE FUNCTIONALITY. THE FAILURE OCCURRED WITHOUT WARNING. THE VEHICLE WAS TAKEN TO HILLTOP CHEVROLET WHERE IT WAS DIAGNOSED THAT THE VACUUM PUMP WAS FAULTY. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 23,367.
- 51. A consumer complaint dated 6/29/2017 and submitted to NHTSA states the following regarding a Class Vehicle: WHILE DRIVING ON 190 IN STOP AND GO TRAFFIC, THE CAR IN FRONT OF ME STOPPED. I APPLIED MY BRAKES AND THE PEDAL WAS HARD AND WOULD NOT DEPRESS. AS A RESULT MY CAR WOULD NOT STOP AND I HIT THE CAR IN FRONT OF ME IN THE REAR END. MY AIR BAGS WENT OFF. I RECEIVED AN AIR BAG BURN. THE CAR IN FRONT OF ME STRUCK THE CAR IN FRONT OF HIM. BOTH OTHER DRIVERS CLAIM THEY WERE INJURED. MY CAR COST \$15,300 TO REPAIR. CHEVROLET IS AWARE OF THIS PROBLEM, **ISSUING PRELIMINARY SERVICE BULLETIN** PIT5361 IN 2015, ADDENDUM B IN 2016 AND ADDENDUM B IN 2017. THE PROBLEM IS A

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FAULTY VACUUM PUMP, MASTER CYLINDER, BRAKE BOOSTER, VACUUM LINE, AND VACUUM PUMP BELT. I WAS NEVER INFORMED OF THIS PROBLEM. I HAVE BEEN DRIVING 50 YEARS AND THIS IS MY FIRST CHARGEABLE ACCIDENT.

A consumer complaint dated 7/16/2017 and submitted to NHTSA

- states the following regarding a Class Vehicle: WHILE EXITING THE OHIO 7 TURNPIKE, MY BRAKE PEDAL BEGAN TO STOP 8 COMPLETELY- TO THE POINT WHERE I COULDN'T PUSH DOWN AT ALL. IT FELT LIKE AN OVER-PUMPED KEG. AS I CONTINUED MY EXIT 10 TOWARD THE TOLL BOOTH, IT SEEMED THAT THE ABS WERE ENGAGING, BUT I WASN'T IN AN EMERGENCY BRAKING SITUATION. 11 THE REST OF MY JOURNEY HOME WAS UNEVENTFUL, UNTIL I 12 13 ARRIVED HOME. I PULLED INTO MY GARAGE, AND ATTEMPTED TO BACK OUT SO I CHECK UNDER THE VEHICLE TO MAKE SURE THERE WASN'T ANYTHING LEAKING. AS I BACKED OUT, MY BRAKES WOULD NOT ENGAGE PROPERLY AGAIN AND MY CAR ROLLED BACK DOWN MY DRIVE WAY. THE CAR STOPPED AND I PARKED IT WHERE IT WAS. LATER IN THE DAY, I WAS ABLE TO PULL THE CAR INTO MY GARAGE 18 WITHOUT INCIDENT. I TOOK THE CAR TO CHESROWN GMC (THE 20 DEALERSHIP WHERE I PURCHASED THE VEHICLE). THEY ADVISED 21 THEY HAD NEVER HEARD OF SUCH A SITUATION AND HAD ME BEING 22 VEHICLE TO THEM. I COULDN'T REPLICATE THE ISSUE WITH THEM, 23 BUT LEFT THE CAR WITH THEM SO THEY COULD CHECK IT OUT FOR 24 ISSUES. THEY REPLACED THE THE BRAKE VACUUM PUMP. TODAY 25 (7/31/17), THE BRAKES STARTED TO BEHAVE IN THE SAME MANNER AS WHEN THEY FAILED ON 7/16/17. 26
 - 53. A consumer complaint dated 8/11/2017 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A

- 2016 CHEVROLET SILVERADO 1500. WHILE OPERATING ON AN INCLINE, THE BRAKE PEDAL WAS DEPRESSED BUT FAILED TO RESPOND. THE FAILURE OCCURRED WITHOUT WARNING. KENNY ROSS CHEVROLET BUICK GMC (LOCATED AT 11250 US-30, NORTH HUNTINGTON, PA) WAS CONTACTED AND UPDATED THE SOFTWARE AND TRANSMISSION. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 18,025.
- 54. A consumer complaint dated 8/13/2017 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING AT 5 MPH, THE BRAKE PEDAL WAS APPLIED BUT FAILED TO RESPOND WITHOUT WARNING. THE VEHICLE WAS TOWED TO A LOCAL DEALER: COUGHLIN FORD OF CIRCLEVILLE LOCATED AT 24001 US HIGHWAY 23 S CIRCLEVILLE OH 49113 WHERE IT WAS DIAGNOSED THAT THE BRAKE SENSOR NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE VEHICLE WAS THEN TOWED TO HARE CHEVROLET LOCATED AT 2001 STONY CREED RD NOBLESVILLE IN 46060 WHERE IT WAS DIAGNOSED THAT THE VACUUM PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND OPENED CASE # 8-31775454 BUT DID NOT OFFER ANY FURTHER ASSISTANCE. THE FAILURE MILEAGE WAS 31,000.
- 55. A consumer complaint dated 8/18/2017 and submitted to NHTSA states the following regarding a Class Vehicle: THE BRAKES ON MY 2015 CHEVY SUBURBAN ARE LOCKING WHEN DRIVING A LOW SPEED. THE PROBLEM STARTED ALL OF THE SUDDEN WHILE DRIVING UNDER DRY ROAD CONDITIONS ON A CITY STREET. IF YOU PRESS ON THE BRAKE PEDAL, IT DOES NOT MOVE AND THE CAR DOES NOT STOPPED. I

- ALMOST HIT A FAMILY OF 4 THAT WAS CROSSING IN FRONT OF ME.
 THE CAR HAS BEEN AT DICK BEARD CHEVROLET IN HYANNIS, MA
 AND THEY ARE SAYING THAT THERE IS NO ISSUE WITH THE BRAKES
 AND AVOIDING SOLVING THE PROBLEM. I'VE CALLED CHEVROLET 4
 TIMES AND THEY ARE NOT CALLING ME BACK. THE CAR IS NOT SAFE
 TO DRIVE AT ALL.
 - 56. A consumer complaint dated 9/4/2017 and submitted to NHTSA states the following regarding a Class Vehicle: WHILE DRIVING ON THE ROAD IN TRAFFIC I WENT TO PRESS ON THE BRAKES AND NOTICED THEY HAD BECOME STIFF AND HAD TO PRESS THEM AS HARD AS POSSIBLE TO SLOWLY STOP WHILE TRYING TO AVOID HITTING ANOTHER VEHICLE IN TRAFFIC. NO WARNING LIGHTS WERE ON IN THE DASH UNTIL I PULLED OVER AND RESTARTED VEHICLE A COUPLE OF TIMES. THEN I GOT THE ACTIVE BRAKE ASSIST SERVICE LIGHT ON. I HAD THE VEHICLE TOWED TO THE NEAREST CHEVROLET SERVICE CENTER DUE TO THE VEHICLE NOT SAFE TO DRIVE.
 - 57. A consumer complaint dated 9/10/2017 and submitted to NHTSA states the following regarding a Class Vehicle: WHEN APPLYING THE BRAKES MY CAR DOESN'T STOP 100% OF THE TIME. 1 TIME DURING HIGHWAY SLOW MOVING TRAFFIC, 3 TIMES BACKING OUT OF MY DRIVEWAY (FLAT SURFACE), 4 TIMES WHEN ON INCLINE/DECLINE OF ROAD. WHEN APPLYING BRAKES, HORRIBLE CHATTERING VIBRATION COMES FROM LEFT FRONT TIRE AREA, CHATTER VIBRATION IS FELT IN BRAKE PEDAL. NO MATTER HOW HARD I APPLY THE BRAKE THE CAR KEEPS GOING IT WILL FINALLY STOP, BUT I ALMOST HIT THE CAR IN FRONT OF ME AT THE ONE HIGHWAY OCCURRENCE, 2 TIMES CAR FINALLY STOPPED JUST BEFORE GOING OVER EDGE OF PROPERTY WHEN PULLING FORWARD & BACKWARD TO TURN

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- AROUND IN TIGHT AREA. IN EACH INSTANCE I AM MOVING AT A VERY SLOW SPEED. I CONTACTED DEALERSHIP, THEY TOLD ME I WASN'T THE ONLY ONE CALLING ABOUT THIS HAPPENING BUT SINCE I'M OVER 36,000 WARRANTY THEY WILL CHARGE ME TO CK IT OUT,
- A consumer complaint dated 9/22/2017 and submitted to NHTSA states the following regarding a Class Vehicle: AS I WAS SITTING IN THE VEHICLE IN PARK, I PLACED MY FOOT ON THE BRAKE AND NOTICED THAT THE BRAKE ASSIST HAD ACTIVATED WHILE IN PARK. I WAS UNABLE TO PUSH THE PETAL DOWN. I WAS ABLE TO MOVE THE SHIFTER INTO DRIVE WITH MY FOOT ON THE BRAKE, BUT THE VEHICLE IMMEDIATELY PLUNGED FORWARD. AS I CONTINUED TO TRY AND DEPRESS THE BRAKE PETAL, THE VEHICLE FINALLY SLOWED TO A STOP. BEFORE I COULD GET OFF THE ROAD AND OUT OF TRAFFIC, THE BRAKE ASSIST CONTINUED TO BE LOCKED UP AND THERE WAS NO BRAKES IF I SHIFTED INTO REVERSE. I WAS EXTREMELY CONCERNED FOR MINE AND MY CHILDREN'S SAFETY AS THIS COULD HAVE CAUSED A VERY SERIOUS ACCIDENT. THE BRAKES DID NOT STOP THE VEHICLE AND WERE DEFECTIVE DUE TO THE VACUUM PUMP "GOING OUT". THE VEHICLE IS ONLY 2 YEARS OLD AND HAS 49K MILES.
- 59. A consumer complaint dated 9/26/2017 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE EXITING THE PARKING LOT AT 5 MPH, THE BRAKES FAILED TO WORK WITHOUT WARNING. THE CONTACT HAD TO CHANGE THE GEAR TO PARK IN ORDER TO STOP THE VEHICLE. THE VEHICLE WAS TOWED TO THE DEALER (BOB PRICE CHEVROLET BUICK GMC, 1225 S STATE HWY 16, FREDERICKSBURG, TX 78624) WHERE IT WAS DIAGNOSED THAT THE BRAKE BOOSTER AND

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THE BRAKE PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 51,800.

- 60. A consumer complaint dated 10/4/2017 and submitted to NHTSA states the following regarding a Class Vehicle: HARD BRAKE PEDAL, INCREASED EFFORT IS NEEDED TO DEPRESS BRAKE PEDAL. MOST COMMONLY AT SPEEDS <35 MPH. OFTEN VEHICLE DOES NOT WANT TO STOP. VEHICLE WAS IN MODERATE MORNING RUSH HOUR TRAFFIC. VEHICLE IN FRONT STOPPED QUICKLY FROM 40 MPH. TRIED PRESSING BRAKE PEDAL ON 2015 TAHOE TO STOP, PEDAL WAS EXTREMELY HARD AND VEHICLE WOULD NOT STOP.
- A consumer complaint dated 10/9/2017 and submitted to NHTSA 61. states the following regarding a Class Vehicle: MY 2015 SUBURBAN WITH APPROX 80K MILES, STARTED HAVING BRAKE PROBLEMS WHEN I WOULD DRIVE IN REVERSE. THE BRAKES HAD A GRINDING NOISE AND WAS GETTING HARD TO PRESS. THE BRAKE PADS WERE REPLACED AROUND 46K MILES AS I BOUGHT THE VEHICLE USED FROM ENTERPRISE SALES. THE BRAKES EVENTUALLY GOT WORSE AND HAD THE BRAKE ASSIST MESSAGE ON DASH COME UP. IF I HAD TO USE THE BRAKES TOO MANY TIMES AT INE TIME LIKE IF I HAD TO GO OVER SPEED BUMPS IN MY NEIGHBORHOOD, THEN THE BRAKES WOULD BE EXTREMELY HARD AND WOULD LOSE ALL POWER BRAKES. IF I KEPT THE VACUUM UP WITH A LITTLE RPM'S- ONE FOOT ON THE BRAKE AND ONE ON THE GAS, THEN I COULD GET THE POWER BRAKES TO WORK. NOW IT'S JUST TOTALLY GONE. NO POWER BRAKES AT ALL NOW AND ORDERED THE VACUUM BOOSTER AND WILL REPLACE IT MYSELF. I CALLED THE MAIN CHEVROLET HOTLINE AND THEY WERE TOTALLY WORTHLESS. I TOLD THEM ABOUT ALL THE NUMEROUS

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- COMPLAINTS POPPING UP ON THE INTERNET AND WITH SUBURBANS WITH MUCH LESS MILES THAN MINE AND TRIED TO SEE IF THEY HAD ANY RECALLS REGARDING THE BRAKES. THEY SAID NO. I SAID THEY SHOULD BE CONCERNED BEFORE IT ENDS UP KILLING SOMEONE.
- A consumer complaint dated 10/26/2017 and submitted to NHTSA 62. states the following regarding a Class Vehicle: WHILE DRIVING, THE DASH MESSAGE ALERTED ME THAT I NEEDED TO "SERVICE BRAKE ASSIST." I WAS NOT USING THE BRAKES, SO I STARTED TO SLOW DOWN AND THE BRAKES WORKED, BUT WHEN I CAME TO THE LIGHT, IT WAS LIKE PRESSING A ROCK AND THE PEDAL WOULD NOT PUSH DOWN. I HAD BRAKE FAILURE, BUT THANKFULLY HAD SLOWED COMPLETE ENOUGH BEFORE COMING TO THE LIGHT, THAT I COULD THROW THE CAR INTO PARK. I PULLED INTO A PARKING LOT AND TAPPED THE BRAKES SEVERAL TIMES, TURNED MY CAR OFF, TURNED IT BACK ON, PUT THE PARKING BRAKE ON AND OFF. THE BRAKES WORKED SO I BEGAN DRIVING VERY CAUTIOUSLY AND STUCK TO BACK ROADS AND STAYED UNDER 35 MPH. THE BRAKES FAILED TWICE MORE AT A STOP SIGN AND A RED LIGHT, WHILE I WAS DRIVING AT LOW SPEEDS. I DROVE THE CAR ONE MORE TIME A FEW HOURS LATER AND HAD COMPLETE BRAKE FAILURE EVERY TIME I TRIED TO STOP. I HAD TO EITHER THROW THE CAR INTO PARK, OR DRIVE INTO A PARKING LOT TO SLOW DOWN. I HAD IT TOWED TO A SERVICE CENTER AT THE CHEVY DEALERSHIP. THE VEHICLE IS UNDER 3 YEARS OLD, HAS ABOUT 60,000 MILES ON IT, HAS BEEN KEPT IN GREAT CONDITION, HAS ON TIME OIL CHANGES, NEVER BEEN IN AN ACCIDENT, AND HAS NEW TIRES. THE CAR HAD NO SQUEALING OR GRINDING TO SHOW WEAR AND TEAR, OR ANY OTHER INDICATOR THE BRAKES WOULD FAIL. THE DEALERSHIP MAINTAINS THAT THIS IS NOT COVERED BECAUSE WE

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- ARE OUT OF WARRANTY, HOWEVER, WE HAVE AN EXTENDED WARRANTY THAT WE ARE USING TO FIX THIS ISSUE. IT IS UNKOWN THE EXACT CAUSE, BECAUSE IT IS AT THE SHOP AWAITING DIAGNOSTICS.
- 63. A consumer complaint dated 10/31/2017 and submitted to NHTSA states the following regarding a Class Vehicle: WHILE REVERSING IN SLOW SPEEDS INTERMITTENTLY IN FORWARD MOTION, THE BRAKE PEDAL BECOMES VERY HARD AND WILL NOT STOP THE VEHICLE. THE BRAKE PEDAL HAS TO BE DEPRESSED VERY HARD AND THERE IS A VIBRATING MOTION. THE MASTER CYLINDER HAS ALREADY BEEN REPLACED BY THE DEALERSHIP AT AN EXPENSE OF NEARLY \$600, BUT THE ISSUE PERSISTS.
- A consumer complaint dated 11/2/2017 and submitted to NHTSA states the following regarding a Class Vehicle: I WAS DRIVING IN TRAFFIC GOING ABOUT 5MPH AND WHEN I APPLIED MY BRAKES THEY WERE NOT WORKING 100% I HAD TO PUSH THE PEDAL TO THE FLOOR AND THE TRUCK KEPT ROLLING. I HAD TO HAD TO FIGURE OUT A WAY TO SAFELY MOVE TO THE SHOULDER OF THE FREEWAY TO AVOID ACCIDENTS. I WAITED ON THE SHOULDER OF THE FREEWAY FOR ABOUT A HOUR FOR TRAFFIC TO STOP. I WAS FINALLY ABLE TO GET OFF THE FREEWAY SO I COULD CHECK THE BRAKE FLUID IT WAS FULL. I KNEW THERE WASN'T A PROBLEM WITH THE BRAKES BECAUSE THEY HAD JUST BEEN REPLACED THE PRIOR MONTH. I KNEW THE VEHILCE WAS NOT SAFE TO DRIVE HOME SO I LEFT THE TRUCK AT DAVIS CHEVROLET AT THEIR NIGHT DROP. I TALKED TO A SERVICE TECHNICIAN AND HE INFORMED ME THAT HE HAS SEEN THIS ISSUE A LOT WITH 2015 TAHOE'S, AND INFACT 3 2015 TAHOE'S WERE BROUGHT IN THE SAME DAY NOVEMBER 3,2017. BEFORE LOOKING AT

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MY VEHICLE THE TECHNICIAN TOLD ME IT WAS THE VACUME PUMP BUT HE WOULD CALL ME BACK TO LET ME KNOW FOR CERTAIN. ONCE THEY LOOKED AT MY TRUCK HE SAID IT WAS THE VACUUM PUMP THAT NEEDED TO BE REPLACED AND IT WAS NOT UNDER WARRANTY. I DON'T UNDERSTAND HOW GM KNOWS ABOUT THIS ISSUE AND STILL DOES NOT RECALL IT, THIS CAN CAUSE MAJOR ACCIDENTS AND POTENTIALLY CAUSE A LIFE. IT'S OBVIOUS THERE IS A ISSUE WITH TJE VACUUME PUMPS IN TJE 2015 TAHOE'S AND GM NEEDS TO TAKE RESPONSIBILITY AND DO A RECALL BEFORE SOMEONE DIES BECAUSE THEIR BRAKES FAIL DUE TO A VACUUM PUMP NOT WORKING

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

HANDLING OF THIS IMPORTANT SAFETY (NOT COSMETIC) ISSUE.

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- 66. A consumer complaint dated 11/11/2017 and submitted to NHTSA states the following regarding a Class Vehicle: WHILE DRIVING AT SLOW SPEED IN SCHOOL PARKING LOT BRAKE PEDAL FAILED TO STOP VEHICLE WHEN USING NORMAL BRAKE PRESSURE. PEDESTRIAN IN FRONT OF VEHICLE JUMPED OUT OF THE WAY TO AVOID BEING STRUCK.
- 67. A consumer complaint dated 11/16/2017 and submitted to NHTSA states the following regarding a Class Vehicle: PROBLEM STARTED AS BRAKES EXTREMELY DIFFICULT TO ACTIVATE WHEN TRAVELING IN REVERSE AT LOW SPEED (I AM APPROX 200 LBS AND HAD TO STAND ON BRAKES WITH EFFORT TO GET VEHICLE TO STOP). PROBLEM ALSO APPEARED IN LOW SPEED STOP AND GO OPERATION AS WELL AS WHEN BACKING AT A MODERATE SPEED OF APPROXIMATELY 10 MILES PER HOUR. WE HAVE HAD AT LEAST ONE OTHER VEHICLE IN OUR FLEET EXPERIENCE THIS ISSUE. IT WAS DETERMINED TO BE A FAILED VACUUM PUMP ON THAT VEHICLE. THIS VEHICLE WAS TAKEN TO DEALER AND THEY WERE UNABLE TO REPLICATE ISSUE. I UNDERSTAND THERE IS A GM TECHNICAL BULLETIN INVOLVING THIS ISSUE BUT NO OIL WAS FOUND IN VACUUM LINES. THE VEHICLE IS OUTSIDE OF WARRANTY SO THERE IS CHARGES EACH TIME WE BRING VEHICLE BACK. I WAS TOLD TO BRING VEHICLE BACK IF PROBLEM BECOMES WORSE. I FEEL A FAILURE OF BRAKES IS AN EXTEREME SAFETY CONCERN IN NORMAL OPERATION AND ESPECIALLY IN HIGH SPEED EMERGENCY OPERATION OF THE VEHICLE. A SEARCH OF THE NHTSA SITE AS WELL AS INTERNET HAS REVELED NUMEROUS COMPLAINTS REGARDING THIS EXACT ISSUE. IT APPEARS THE COMMON REPLACEMENT IS THE BRAKE ASSIST AND VACUUM PUMP.

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A consumer complaint dated 11/19/2017 and submitted to NHTSA 68. states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. WHILE DRIVING APPROXIMATELY 25 MPH, THE STEERING WHEEL INADVERTENTLY PULLED TO THE RIGHT. WHILE ATTEMPTING TO DEPRESS THE BRAKE PEDAL, THE BRAKES FAILED TO STOP THE VEHICLE. AS A RESULT, THE CONTACT LOST CONTROL OF THE VEHICLE AND CRASHED INTO A PARKED VEHICLE. WHILE THE GEAR SHIFTER WAS IN REVERSE OR DRIVE, THE VEHICLE FAILED TO OPERATE. THE AIR BAGS DID NOT DEPLOY. THE TIRE PRESSURE AND EPS ASSIST WARNING INDICATORS ILLUMINATED. THE CONTACT SUSTAINED AN INJURY TO THE LOWER BACK, BUT NO MEDICAL ATTENTION WAS REQUIRED. A POLICE REPORT WAS NOT FILED. THE VEHICLE WAS TOWED TO NISSANI BROS. CHEVROLET (6101 W SLAUSON AVE, CULVER CITY, CA 90230 (424) 216-7400), BUT IT HAD NOT BEEN DIAGNOSED. THE VEHICLE WAS NOT REPAIRED. THE CONTACT REFERENCED NHTSA CAMPAIGN NUMBER: (SUSPENSION). THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND THE CONTACT WAS PROVIDED CASE NUMBER: 8-3571350184. THE CONTACT WAS ADVISED TO CALL NHTSA. THE APPROXIMATE FAILURE MILEAGE WAS 25,400.

A consumer complaint dated 12/8/2017 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 GMC YUKON. WHILE AT A DRIVE THRU WITH THE BRAKE PEDAL DEPRESSED TO THE FLOORBOARD, THE BRAKES FAILED. THE CONTACT HAD TO APPLY EXCESSIVE FORCE IN ORDER FOR THE VEHICLE NO WARNING TO STOP. THERE WERE **INDICATORS** ILLUMINATED. THE VEHICLE WAS TAKEN TO STARLING CHEVROLET BUICK GMC (1001 E IRLO BRONSON MEMORIAL HWY, ST CLOUD, FL

- 34769, PHONE: (407) 892-5144), BUT THE CAUSE OF THE FAILURE COULD NOT BE DETERMINED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOTIFIED AND STATED THAT THE FAILURE HAD TO BE DUPLICATED. THE APPROXIMATE FAILURE MILEAGE WAS 42,000. THE VIN WAS NOT AVAILABLE.
- 70. A consumer complaint dated 12/12/2017 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE DRIVING APPROXIMATELY 40 MPH, THE CONTACT ATTEMPTED TO APPLY THE BRAKES AND THE BRAKE PEDAL WOULD NOT DEPRESS. THE CONTACT HAD TO APPLY THE EMERGENCY BRAKE TO GET THE VEHICLE TO STOP. THE VEHICLE WAS NOT TAKEN TO THE DEALER. THE VEHICLE WAS DRIVEN TO AN INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE MASTER BRAKE CYLINDER AND BRAKE BOOSTER FAILED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE. THE VIN WAS UNKNOWN. THE FAILURE MILEAGE WAS 100,000.
- 71. A consumer complaint dated 12/16/2017 and submitted to NHTSA states the following regarding a Class Vehicle: BRAKES BECAME EXTREMELY STIFF, AND POWER ASSIST WAS LOST. VEHICLE IS VERY HARD TO STOP, NEARLY CAUSING AN ACCIDENT SEVERAL TIMES. TOOK VEHICLE TO A SERVICE SHOP, AND FOUND OUT THAT THE VACUUM PUMP WAS DEFECTIVE AND CAUSED OIL TO ENTER MY BRAKE VACUUM AND BRAKE LINES. HAD TO ALL BE REPLACED.
- 72. A consumer complaint dated 12/23/2017 and submitted to NHTSA states the following regarding a Class Vehicle: WHILE TRAVELING STRAIGHT AT 70 MPH ON THE HIGHWAY IN MY 2015 CHEVY SUBURBAN (62K MILES) THE VEHICLE EXPERIENCED A SUDDEN AND UNDETECTED COMPLETE BRAKE SYSTEM FAILURE. AS I APPROACHED SLOWING

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TRAFFIC WITH THE CRUISE CONTROL ON, I TAPPED THE BRAKES TO DISENGAGE THE CRUISE CONTROL, ONLY TO FIND THAT THE BRAKE PEDAL WAS RIGID AND COULD NOT BE DEPRESSED. TO AVOID A COLLISION AT A HIGH RATE OF SPEED I SWERVED ONTO THE RIGHT SHOULDER WHILE USING TWO LEGS TO AGGRESSIVELY PUSH THE BRAKE PEDAL DOWN - ALL THE WHILE FEELING VERY LITTLE BRAKING ACTION. THE CAR CAME TO A STOP AFTER ABOUT 75 METERS. AT NO TIME BEFORE OR DURING THE EVENT DID THE CAR SIGNAL A BRAKING SYSTEM PROBLEM. IN FACT IT STILL SHOWED NO SYSTEM INDICATOR OF A BRAKE PROBLEM 3 DAYS LATER WHEN IT WAS DELIVERED TO THE DEALER FOR DIAGNOSIS. THE CAR HAS BEEN WELL MAINTAINED, HAVING JUST UNDERGONE A 60K MILE SERVICE AT THE DEALERSHIP. THE LACK OF THE VEHICLE'S RECOGNITION THAT A CRITICAL FAILURE IN THE BRAKING SYSTEM HAD OCCURRED POSED A SERIOUS AND IMMEDIATE THREAT TO PASSENGERS AND SURROUNDING TRAFFIC. AS A PHYSICIAN I CAN ATTEST THAT A COLLISION AT THAT SPEED WOULD HAVE SEVERELY INJURED OR EVEN KILLED THOSE INVOLVED. THIS PROBLEM WITH THE 2015 CHEVY SUB HAS REPORTED TO NHTSA BEFORE - THIS IS NOT AN ISOLATED EVENT. THE SERVICE CENTER REPORTED TO ME THAT A VACUUM PUMP FAILURE WAS TO BLAME - I BELIEVE THIS IS A MORE COMPLEX ENGINEERING PROBLEM IN THAT THE VEHICLE DID NOT DETECT A PROBLEM DESPITE THE FAILURE CREATING A LIFE THREATENING SCENARIO. ALTHOUGH I PLAN TO IMMEDIATELY DISPOSE OF THIS CAR, FAILURE TO ADDRESS THIS PROBLEM BY THE MANUFACTURER WILL PUT OTHERS AT RISK IN THE FUTURE. GM APPEARS TO HAVE ISSUED A SERVICE BULLETIN THAT REFERS TO THIS PROBLEM (ATTACHED). I SINCERELY BELIEVE THIS DEFECT WILL

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- RESULT IN LIVES LOST IF LEFT UNADDRESSED. INFORMATION REDACTED PURSUANT TO THE FREEDOM OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6).
- 73. A consumer complaint dated 12/28/2017 and submitted to NHTSA states the following regarding a Class Vehicle: I'M HAVING BRAKE BOOSTER FAILURE AT SLOW SPEEDS, THE BRAKE PETAL IS SUPER HARD TO PUSH DOWN AND IT ALMOST ISN'T ENOUGH TO MAKE THE TRUCK STOP ROLLING AT SLOW SPEEDS. TRUCK HAS RIGHT AT 43,XXX MILES ON IT AND IS NOT UNDER WARRANTY.
- 74. A consumer complaint dated 1/5/2018 and submitted to NHTSA states the following regarding a Class Vehicle: AS WE WERE DRIVING FROM ATLANTA TO MIAMI, WHEN WE WERE GETTING OFF THE HIGHWAY THE BRAKES ON OUR 2015 CHEVROLET SUBURBAN FAILED TO STOP AT 60 MILES PER HOUR, WE ALMOST REARED-ENDED AN EIGHTEEN-WHEELER; WITH OUR FAMILY OF FIVE AND OUR TWO DOGS ON BOARD! ALL FLUIDS HAD BEEN CHECKED ON THE CAR AND THE BRAKE PADS WERE RECENTLY CHANGED. WE JUST CALLED AND NOTIFIED CHEVROLET ABOUT THIS SAFETY ISSUE. WE ASKED IF THERE WERE ANY ISSUES AND/OR RECALLS ON OUR VEHICLE AND THE AGENT SAID THAT THERE WERE NO ISSUES OR RECALLS REGARDING THIS TYPE OF VEHICLE. WE MADE AN APPOINTMENT TO HAVE OUR CAR DIAGNOSED AS SOON AS POSSIBLE. RESEARCHING ONLINE WE FOUND NUMEROUS POSTS ON SEVERAL SITES FROM OTHER SUBURBAN OWNERS REPORTING THE SAME ISSUE WITH THEIR BRAKING SYSTEM NOT RESPONDING. WHAT WILL IT TAKE FOR CHEVROLET TO ACKNOWLEDGE THIS BRAKE FAILURE SYSTEM ISSUE?!?! SOMEONE TO GET KILLED?!?! PLEASE LOOK INTO THIS BRAKE FAILURE ISSUE AND ADDRESS IT PROMPTLY!!!

- 75. A consumer complaint dated 1/12/2018 and submitted to NHTSA states the following regarding a Class Vehicle: TL* THE CONTACT OWNS A 2015 GMC YUKON. WHILE DRIVING APPROXIMATELY 5 MPH, THE BRAKE PEDAL STIFFENED AND THE VEHICLE DID NOT STOP WHEN THE PEDAL WAS DEPRESSED. THERE WERE NO WARNING INDICATORS ILLUMINATED. THE CONTACT USED THE EMERGENCY BRAKE TO STOP THE VEHICLE. THE VEHICLE WAS TAKEN TO KEYES WOODLAND HILLS BUICK GMC (6133 TOPANGA CANYON BLVD, WOODLAND HILLS, CA 91367) WHERE IT WAS DIAGNOSED THAT THE VACUUM PUMP FAILED AND DAMAGED THE ENTIRE BRAKING SYSTEM. THE TECHNICIAN REPLACED THE VACUUM PUMP AND THE ENTIRE BRAKING SYSTEM. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND STATED THAT THERE WAS NO RECALL. THE FAILURE MILEAGE WAS 40,500.
- 76. A consumer complaint dated 2/2/2018 and submitted to NHTSA states the following regarding a Class Vehicle: ISSUE REGARDING BRAKING SYSTEM AND INTERNAL FAILURE. COST TO REPAIR IS \$1500 ON A 3 YEAR OLD CAR. GM HAS BEEN AWARE OF THIS ISSUE SINCE 2015. THEY ARE ALSO DEFENDANTS IN A CLASS ACTION LAWSUIT REGARDING THE BRAKES AND THE CATASTROPHIC FAILURE THAT WILL EVENTUALLY RESULT IN DEATH.
- 77. A consumer complaint dated 2/6/2018 and submitted to NHTSA states the following regarding a Class Vehicle: MY 2015 CHEVROLET TAHOE LT WOULD NOT STOP APPROACHING A MAJOR INTERSECTION. BRAKE PEDAL BECAME HARD AND WOULD NOT COME TO A COMPLETE STOP AT A MAJOR CITY INTERSECTION, NEARLY CAUSING AN ACCIDENT. I WAS TOLD BY THE DEALERSHIP THAT THE VACUUM PUMP WILL NEED TO BE REPLACED AT MY EXPENSE AND IT IS A COMMON OCCURRENCE

- ON THIS YEAR AND MODEL . NOT ONLY IS THIS A SAFETY ISSUE, ITS A
 COMMON PROBLEM AND A TECHNICAL BULLETIN HAS BEEN
 RELEASED FOR THE REPAIR. THIS VEHICLE IS OUT OF THE BUMPER TO
 BUMPER WARRANTY BUT IS STILL HOWEVER UNDER THE 1000,000
 DRIVE TRAIN WARRANTY. GM NEEDS TO ADDRESS THIS PROBLEM
 BEFORE SOMEONE GETS INJURED.
 - 78. A consumer complaint dated 3/5/2018 and submitted to NHTSA states the following regarding a Class Vehicle: PLACING CAR IN REVERSE OR DRIVE AT SLOW SPEEDS AND PRESSING BRAKES ALL THE WAY TO THE FLOOR WITH THE VEHICLE NOT STOPPING. BRAKE SYSTEM WARNING LIGHT WOULD COME ON. ISSUE COMES AND GOES WHEN IT PLEASES. TAKING THE SUBURBAN TO DEALERSHIP TODAY. STARTED HAPPENING AROUND 59000 MILES
 - 79. A consumer complaint dated 3/10/2018 and submitted to NHTSA states the following regarding a Class Vehicle: BRAKES GOT HARD WHEN DRIVING ONTO EXPRESSWAY TAHOE HAS ONLY 42000 MILES AND HEARD THERES BEEN ALOT OF ISSUES WITH THE VACUUM PUMP WHAT I HAVE READ.THERE NEEDS TO BE A RECALL
 - 80. A consumer complaint dated 3/13/2018 and submitted to NHTSA states the following regarding a Class Vehicle: I BEEN HAVING MY TRUCK FOR 2 YEARS AND BRAKES KEEP GOING OUT AND THE AIR CONDITION KEEPS GOING OUT. I HAVE TWO FRIENDS THE SAME VEHICLE WITH THE SAME PROBLEMS. THIS IS RIDICULOUS I SEE NO RECALLS ON THAT. AND I'VE SEEN ON THE REVIEWS OF THIS VEHICLE AND ITS NOT JUST ME THERE'S PEOPLE OUT THERE WITH THE SAME PROBLEM THAT I AM HAVING. THIS COULD CAUSE A REALLY BAD ACCIDENT THE BRAKES KEEP GOING OUT I AM NOT THE ONLY ONE WITH THIS PROBLEM. PLEASE TAKE IN CONSIDERATION THAT EVERYONE HAS

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- FAMILIES. AND ACCIDENTS COULD CAUSE US TO LOSE OUR FAMILY JUST FOR A SIMPLE BRAKES THAT HAVE NOT BEEN RECALLED. AND ALSO, WE JUST CANNOT KEEP AFFORDING TO FIX THE AIR CONDITIONING THIS TRUCK IS NOT EVEN OLD ENOUGH TO BE GIVING US THESE PROBLEM. THANK YOU
- A consumer complaint dated 3/23/2018 and submitted to NHTSA states the following regarding a Class Vehicle: IN OCTOBER 2017 WE EXPERIENCED BRIEF PERIODS WHERE BRAKE PEDAL BECAME RIGID AND IMPOSSIBLE TO DEPRESS. THE VEHICLE WAS TAKEN TO OUR LOCAL CHEVROLET DEALER. WE DESCRIBED IN DETAIL THE RIGID BRAKE PEDAL. THE DEALER WANTED TO DO PUT NEW BRAKE PADS AND TURN THE ROTORS. I THOUGHT IT WAS STRANGE THAT A VEHICLE WITH JUST OVER 40 THOUSAND MILES WOULD NEED NEW BRAKES, BUT WE HAD THE WORK DONE. THE DEALER ALSO WANTED TO REPLACE THE VACUUM HOSE WHICH POWERS THE BRAKE SYSTEM. THIS WORK WAS ALSO DONE. NEXT, ON FRIDAY MARCH 23, 2018 WE WERE TRAVELING ON AN INTERSTATE AT A HIGH SPEED WHEN THE BRAKE PEDAL BECAME IMPOSSIBLE TO DEPRESS. WE WERE VERY FORTUNATE NOT TO CAUSE A SERIOUS ACCIDENT. I HAD TO HAVE IT TOWED TO A DEALER AND RENT A CAR. THE FOLLOWING WEEK WE WERE CONTACTED BY THE DEALER DOING THE REPAIRS. OUR SUBURBAN HAD A VACUUM PUMP FAILURE. THIS CAUSED TOTAL BRAKE FAILURE. AFTER SOME RESEARCH I DISCOVERED THAT THIS VEHICLE'S ENGINE DOES NOT PRODUCE ENOUGH VACUUM TO POWER THE BRAKES (UNLIKE EVERY OTHER VEHICLE ON THE ROAD). IN ANY OTHER CAR THE ONLY WAY YOU LOSE SUCTION FOR YOUR BRAKES IS IF THE ENGINE STOPS. IN OUR SUBURBAN THE ENGINE CAN BE RUNNING FINE AND YOU MAY OR MAY NOT HAVE BRAKES. THE

WARNING SYSTEM IS TOTALLY USELESS AS IT ISN'T TRIGGERED 1 2 UNTIL YOU EXPERIENCE TOTAL BRAKE FAILURE WITHOUT ANY 3 WARNING. WHILE THE VEHICLE WAS IN THE SERVICE DEPARTMENT HAVING VACUUM PUMP REPLACED THE DEALER ALSO EXPLAINED 4 THAT ALL FOUR MAGNETIC RIDE SHOCKS/STRUTS WERE LOCKED IN 5 PLACE AND NOT FUNCTIONING AT ALL. THIS IS ANOTHER SERIOUS SAFETY ISSUE. I HAVE NEVER HEARD OF SHOCKS "LOCKING UP". 7 8 AFTER SOME MORE RESEARCH, I FOUND THIS IS A HUGE PROBLEM FOR GM VEHICLES. A PROBLEM THAT GM HAS FAILED TO ADDRESS. I 10 HAVE ALSO HAD 3 MAJOR REPAIRS ON AC. INCLUDING NE AC LINES 11 AND NEW COMPRESSOR.

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

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

CAN'T REPLICATE THE ISSUE THERE FORE CAN NOT FIX.

V. CLASS ALLEGATIONS

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

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

- 85. This action has been brought and may be properly maintained and certified as a Class Action because:
 - (a) The questions and issues of law or fact are of a common or general interest, affecting the Class of individuals and the public at large;
 - (b) The Class consists of a sufficiently large group of individuals, believed to exceed thousands of members, and is so large that it is impractical to join all members of the Class before the Court as individual plaintiffs. The identity of Class members is readily ascertainable from various sources including GM's ownership records, GM's repair records, government ownership records, and/or via simple notice by publication;
 - (c) The questions of law or fact common to the Class are substantially similar and predominate over those questions affecting only specific members of the Class;
 - (d) The Class is united by a community of interests in obtaining appropriate equitable relief including injunctive relief, recall of Class Vehicles, restitution, damages, and other available relief designed to redress the wrongful conduct of Defendant GM;
 - (e) Plaintiffs are members of the Class and their claims are typical of the Class;
 - (f) Plaintiffs will fairly and adequately represent the claims of the Class, and protect the interests of each member of the Class without exercising personal interest or otherwise acting in a manner inconsistent with the best interests of the Class generally;

- (g) Plaintiffs retained attorneys experienced in the litigation of class and representative claims and in the area of consumer protection litigation who have agreed to and will responsibly and vigorously advocate on behalf of the Class as a whole;
- (h) Without class certification, the prosecution of separate consumer actions by individual members of the Class would be impracticable and financially difficult, and create a risk of repetitive, inconsistent and varying adjudications. This would have the effect of establishing incompatible standards of conduct for GM, discouraging the prosecution of meritorious but small claims, and/or result in adjudications which would be dispositive of the interests of other Class Members not parties to the adjudication, or otherwise substantially impair the ability of Class Members to protect their rights and interests;
- (i) Defendant GM acted or refused to act on grounds generally applicable to the Class, thereby making the award of equitable relief and/or restitution appropriate to the Class as a whole;
- (j) The class action procedure is superior to other methods of adjudication, and specifically designed to result in the fair, uniform and efficient adjudication of the claims presented by this complaint. This class action will facilitate judicial economy and preclude the undue financial, administrative and procedural burdens which would necessarily result from a multiplicity of individual actions.
- 86. Because the damages suffered by each Class Member is relatively small compared to the expense and burden of prosecuting this compelling case against a well-financed, multibillion dollar corporation, this class action is the only way each Class Member can redress the harm that Defendant GM caused.
- 87. Should individual Class Members be required to bring separate actions, California's courts would face a multitude of lawsuits that would burden the court system and create a risk of inconsistent rulings and contradictory judgments. In contrast to proceeding on a case-by-case basis, in which inconsistent results will magnify the delay and expense to all parties and the court system, this class action presents far fewer management difficulties while providing unitary adjudication, economies of scale, and comprehensive supervision by a single court.

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

VI. TOLLING AND ESTOPPEL

- 89. Any applicable statutes of limitations that might otherwise bar any of Plaintiffs' claims and those of the Class are tolled by Defendant's knowing and active concealment of the defect in the Class Vehicles, and the safety risks resulting therefrom.
- 90. Defendant, as the manufacturer of the Class Vehicles and therefore in a superior position to know of the material issues, was under a continuous duty to disclose to Plaintiffs and members of the Class the true standard and quality of the Class Vehicles and to disclose the defect and the associated safety hazards. Defendant kept Plaintiffs in the dark as to necessary information essential to the pursuit of their claims. Because of Defendant's cover-up, Plaintiffs and Class Members could not have reasonably discovered the defect in their Class Vehicle. Defendant is therefore estopped from relying on any statutes of limitations in defense of this action.

FIRST CAUSE OF ACTION

(Violation of the Consumers Legal Remedies Act)

- 91. Plaintiffs adopt and incorporate all preceding paragraphs as if stated fully herein.
- 92. California Civil Code Sections 1750, et seq., ("Consumers Legal Remedies Act" or "CLRA") precludes Defendant from representing that goods have uses, characteristics and benefits, standards, qualities or grades that they do not have. Through omission and concealment, Defendant has misrepresented that Class Vehicles: (a) have characteristics, uses or benefits that they do not have (Section 1770(a)(5)); and, (b) are of a particular standard, quality, or grade when they are of

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another (Section 1770(a)(7)). Plaintiffs incorporate herein paragraphs 1-6 and 13-82 as particularized evidence of the pattern of misrepresentation by omission perpetrated by Defendant against Plaintiffs and the Class.

- Defendant has designed, manufactured, marketed, sold, and placed into 93. the stream of commerce the Class Vehicles sold across California. Defendant has failed to disclose and concealed the serious safety hazard posed by the design of Class Vehicles' braking system, which as a result of known design defects causes the Class Vehicles to lose brake boost without warning, severely and suddenly compromising both pedal feedback (controllability) and actual stopping distances.
- 94. Defendant had a duty to disclose this material safety hazard because reasonable consumers expect braking systems to perform their only intended and reasonably expected function and purpose of slowing their vehicles with consistent brake pedal feedback and consistently safe stopping distances. In failing to adequately disclose this critical safety hazard, known to Defendant but not to reasonable consumers like Plaintiffs and Class Members, Defendant has violated the CLRA, including Civil Code §1770(a)(5) and (7).
- None of the information provided by Defendant to consumers discloses 95. the hazard.
- 96. Were it not for Defendant's wrongful conduct in violation of the CLRA, reasonable consumers including Plaintiffs and the Class would not have purchased Class Vehicles. Instead, they would have purchased safe and reliable vehicles with braking systems that are fit and safe for their only intended purpose.
- 97. The members of the Class have suffered injury in fact and lost money as a direct result of Defendant's wrongful conduct. Each has expended money to purchase a Class Vehicle, and would not have done so had they been aware of the material safety omission alleged in this Complaint. Each will need to expend money to repair or replace their Class Vehicle with safe braking systems adequately designed to perform their only intended and expected function of consistently and

safely slowing their vehicle.

- 98. In light of the defectively designed braking system common to each Class Vehicle, Defendant knew and has known of the hazard and dangerous condition caused by consumers' use of and reliance upon the Class Vehicles. Defendant knew and has known that if it disclosed the true facts about the danger posed by their braking systems, consumers would not purchase Class Vehicles, and Defendant would not be able to market and sell them. Defendant continues to produce and sell Class Vehicles despite their known defective condition that risks the lives of consumers and the public at large. Defendant has and continues to recklessly and intentionally ignore public hazard caused by its omission and concealment of the hazard posed by the defective braking systems present in Class Vehicles.
- 99. The information referred to in Paragraphs 1-6 and 13-82, *supra*, as well as Defendant's awareness from its prior experience in lawsuits alleging the same defect, have all placed Defendant on notice of the danger posed by its Class Vehicles. Yet, Defendant has ignored the hazards known to it and continues to make profit-directed decisions in conscious disregard of the safety and well-being of California residents as well as the non-residents who bought or leased Class Vehicles in California.
- 100. As a result of Defendant's violations of the Consumers Legal Remedies Act, Plaintiffs and the Class are entitled to equitable relief and a declaration that Defendant's conduct violates the Consumers Legal Remedies Act.
- 101. Plaintiffs disclaim any request for monetary relief including, but not limited to, attorney's fees, costs or punitive damages, under the Consumers Legal Remedies Act at this time but reserve the right to seek such relief after providing Defendant with the notice required by the Act.

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SECOND CAUSE OF ACTION

(Violation of the California Unfair Competition Law)

- 102. Plaintiffs adopt and incorporate all preceding paragraphs as if stated fully herein.
- 103. California Business & Professions Code Section 17200 (hereinafter "Unfair Competition Law" or "UCL") precludes unfair competition, *i.e.*, the employment of any unlawful, unfair or fraudulent business acts or practices; and any unfair, deceptive, untrue or misleading advertising violative of Cal. Bus. & Prof. Code Section 17500. This prohibition extends to any act, omission or conduct, or pattern of activity, engaged in within California which affects the rights of consumers within the State of California and elsewhere.
- 104. In marketing and selling the Class Vehicles, and in otherwise causing the Class Vehicles to be placed into the stream of commerce for use by consumers in the United States with defective braking systems, and in continuing to conceal this critical safety information regarding the dangers associated with the use of the Class Vehicles, Defendant made available for consumer use a dangerous and patently unsafe product which is not safely useable for its intended purpose. Defendant was and remains obligated to disclose the hazard associated with the Class Vehicles because of the public's reasonable expectation that the Class Vehicles would not under normal and expected use suddenly and unexpectedly lose effective braking power. In failing to disclose this critical safety issue which was known and readily apparent to Defendant but not to reasonable consumers, including Plaintiffs and the Class, Defendant engaged in fraudulent conduct under Cal. Bus. & Prof. Code §17200. Plaintiffs incorporate herein as though fully set forth herein Paragraphs 1-6 and 13-82, *supra*, as particularized evidence of the pattern of concealment perpetrated by Defendant against Plaintiffs and the Class.
- 105. The aforementioned conduct is unlawful within the meaning of the UCL in that, among other things, it violates the CLRA to the extent that Defendant

represented, by the omission and concealment of critical safety information well-known to Defendant, that the Class Vehicles: (a) had characteristics, uses or benefits that they did not have in violation of Section 1770(a)(5) of the CLRA; and, (b) was of a particular standard, quality or grade when it was of another in violation of 1770(a)(7) of the CLRA.

- 106. Defendant's conduct is unfair within the meaning of the UCL in that the alleged consumer injury is substantial, creating an unreasonable risk of catastrophic physical injury or death to any persons coming into contact with Class Vehicles. There is no countervailing benefit to having or continuing to conduct itself in the wrongful manner averred to herein.
- 107. Were it not for the unfair competition of Defendant, the Class would not have purchased Class Vehicles.
- 108. Plaintiffs have suffered an injury in fact, including the loss of money and/or property, as a result of Defendant's unfair, unlawful and/or deceptive practices. In purchasing or leasing their vehicles, Plaintiffs relied on Defendant's misrepresentations and/or omissions with respect to the safety, reliability and dependability of the vehicles.
- 109. The members of the Class have and will continue to suffer injury in fact and lose money as a direct result of Defendant's unfair competition in that each has expended money to purchase Class Vehicles, and have or will be caused to expend money to repair or replace their Class Vehicle with safe braking systems adequately designed to perform their only intended and expected function of consistently and safely slowing their vehicle.
- 110. The wrongful conduct alleged herein occurred, and continues to occur, in the conduct of Defendant's business. Defendant's wrongful conduct is part of a pattern or generalized course of conduct that is still perpetuated and repeated, both in the State of California and nationwide.

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111. Plaintiffs request that this Court enjoin Defendant from continuing its
unfair, unlawful, and/or deceptive practices and to restore to Plaintiffs any money
Defendant acquired through unfair competition including, but not limited to
restitution and disgorgement.

112. As a result of Defendant's unfair competition, Plaintiffs and the Class are entitled to appropriate equitable relief, including injunctive relief, and monetary relief in the form of restitution (including fluid recovery if certified as a class action).

THIRD CAUSE OF ACTION

(Violation of the Song-Beverly Consumer Warranty Act Breach of Implied Warranty)

- 113. Plaintiffs adopt and incorporate all preceding paragraphs as if stated fully herein.
- 114. The Class Vehicles are "consumer goods" within the meaning of Cal. Civ. Code § 1791(a).
- 115. Defendant GM is a "manufacturer" within the meaning of Cal. Civ. Code § 1791(j).
- 116. Defendant impliedly warranted to Plaintiffs that Class Vehicles were "merchantable" within the meaning of Cal. Civ. Code §§ 1791.1(a) & 1792.
- 117. Cal. Civ. Code § 1791.1(a) states: "Implied warranty of merchantability" or "implied warranty that goods are merchantable" means that the consumer goods meet each of the following:
 - (1) Pass without objection in the trade under the contract description.
 - (2) Are fit for the ordinary purposes for which such goods are used.
 - (3) Are adequately contained, packaged, and labeled.
 - (4) Conform to the promises or affirmations of fact made on the container or label.

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- The Class Vehicles are not fit for ordinary purposes for which they are used.
- The Class Vehicles are not adequately labeled because the labeling misrepresents that the vehicles are compliant with federal and California standards or fails to disclose such noncompliance.
- The Class Vehicles do not conform to the promises or affirmations of fact made on their label because their label misrepresents their fuel efficiency.
- 122. Defendant's conduct deprived Plaintiffs of the benefit of their bargain and have caused the Class Vehicles to be worth less than what Plaintiffs paid.
- 123. As a direct and proximate result of Defendant's conduct, Plaintiffs received goods whose condition substantially impairs their value. Plaintiffs have been damaged by the diminished value of the vehicles, the vehicles' malfunctioning, and actual and potential increased maintenance and repair costs.
- 124. Plaintiffs have complied with all obligations under the warranty, or otherwise have been excused from performance of said obligations as a result of Defendant's conduct.
- 125. Under Cal. Civ. Code §§ 1791.1(d) & 1794, Plaintiffs are entitled to damages and other legal and equitable relief including, but not limited to the purchase price of the Class Vehicles or the overpayment or diminution in value of the Class Vehicles, and attorney's fees and costs.

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VII. RELIEF REQUESTED

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

- a. For an order certifying this action as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure and appointing Plaintiffs as the representatives of the Class and their counsel as Class Counsel;
- b. On the First Cause of Action, Plaintiffs seek only equitable relief and disclaim any other relief until after providing Defendant with the notice required by the Act;
- c. For an order requiring Defendant General Motors LLC to buy back Class Vehicles, refund the purchase price of Class Vehicles, or otherwise, free of charge, replace the defective braking systems of Class Vehicles with defect-free components and ensure that Class Vehicles comply with applicable safety standards;
- d. For an order awarding Plaintiffs actual, statutory or any other form of damages provided by statute or required by law;
- e. For an order awarding Plaintiffs punitive damages in an amount sufficient to serve as an appropriate punishment in light of all the facts and circumstances, including Defendant's financial condition;
- f. For an order awarding Plaintiffs restitution, disgorgement or any other equitable relief provided by statute or as the Court deems proper;
- g. For an order awarding Plaintiffs pre-judgment and post-judgment interest;
- h. For an order awarding Plaintiffs reasonable attorney fees and costs of suit, including expert witness fees; and
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1	i. For an order award	ing such other and further relief as this Court may			
2	deem just and proper.				
3	DATED: October 9, 2018	Respectfully submitted,			
4	,				
		KIESEL LAW LLP			
5					
6					
7		By: /s/Nicole Ramirez			
8		Paul R. Kiesel			
9		Jeffrey A. Koncius Nicole Ramirez			
		Nicole Railliez			
10		CODY WATSON D.C.			
11		CORY WATSON, P.C. Adam W. Pittman			
12		[to be admitted <i>Pro Hac Vice</i>]			
		apittman@CoryWatson.com			
13		F. Jerome Tapley			
14		[to be admitted <i>Pro Hac Vice</i>]			
15	jtapley@CoryWatson.com				
		Ryan Lutz			
16		[to be admitted <i>Pro Hac Vice</i>]			
17		rlutz@CoryWatson.com 2131 Magnolia Avenue South			
18		Birmingham, Alabama 35205			
		Tel.: (205) 328-2200			
19		Fax: (205) 324-7896			
20					
21		WYLY~ROMMEL, PLLC			
22		James C. Wyly [to be admitted <i>Pro Hac Vice</i>]			
		jwyly@wylyrommel.com			
23		Sean F. Rommel			
24		[to be admitted Pro Hac Vice]			
25		srommel@wylyrommel.com			
		4004 Texas Boulevard			
26		Texarkana, Texas 75503			
27		Tel.: (903) 334-8646			
28					

BEASLEY ALLEN Clay Barnett [to be admitted *Pro Hac Vice*] Clay.Barnett@beasleyallen.com 4200 Northside Pkwy NW Building One, Suite 100 Atlanta, GA 30327 Tel.: (334) 269-2343 Fax: (855) 674-1818

VIII. DEMAND FOR JURY 1 2 Plaintiffs Scott Peckerar and Samantha Peckerar, individually and on behalf 3 of the Class, demand a trial by jury. DATED: October 9, 2018 4 Respectfully submitted, 5 KIESEL LAW LLP 6 7 8 By: /s/ Nicole Ramirez Paul R. Kiesel 9 Jeffrey A. Koncius Nicole Ramirez 10 11 **CORY WATSON, P.C.** 12 Adam W. Pittman [to be admitted *Pro Hac Vice*] 13 apittman@CoryWatson.com F. Jerome Tapley 14 [to be admitted *Pro Hac Vice*] jtapley@CoryWatson.com 15 Ryan Lutz 16 [to be admitted *Pro Hac Vice*] rlutz@CoryWatson.com 17 2131 Magnolia Avenue South Birmingham, Alabama 35205 18 Tel.: (205) 328-2200 19 Fax: (205) 324-7896 20 WYLY~ROMMEL, PLLC 21 James C. Wyly [to be admitted *Pro Hac Vice*] 22 jwyly@wylyrommel.com Sean F. Rommel 23 [to be admitted *Pro Hac Vice*] srommel@wylyrommel.com 24 4004 Texas Boulevard 25 Texarkana, Texas 75503 Tel.: (903) 334-8646 26 27 28

BEASLEY ALLEN Clay Barnett [to be admitted *Pro Hac Vice*] Clay.Barnett@beasleyallen.com 4200 Northside Pkwy NW Building One, Suite 100 Atlanta, GA 30327 Tel.: (334) 269-2343 Fax: (855) 674-1818

EXHIBIT "A"

SB-10057667-3895



Service Bulletin

File in Section:

Bulletin No.: PIT5361

Date: February, 2015

PRELIMINARY INFORMATION

Subject: Diagnostic Tip - Additional Brake Pedal Effort

Models: 2015 Cadillac Escalade Models

2014 Chevrolet Silverado 1500

2015 Chevrolet Silverado 1500, Suburban, Tahoe

2014 GMC Sierra 1500

2015 GMC Sierra 1500, Yukon Models

The following diagnosis might be helpful if the vehicle exhibits the symptom(s) described in this PI.

Condition/Concern

In some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

In some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

Recommendation/Instructions

If engine oil is found, it is important the following parts are replaced. If not, the condition will return.

- 1. Vacuum Pump
- 2. Vacuum Line between the booster and the pump
- 3. Brake Booster
- 4. Master Cylinder

Parts Information

Part Number	Description	Qty
12662552	PUMP ASM-VAC	1
23144638 (VYU) or 23135228 (w/ o VYU)	PIPE ASM-P/B BOOS VAC	1
23135220	BOOSTER ASM-P/B	1
20925765	CYLINDER-BRK MAS	1

excel sheet

Warranty Information

For vehicles repaired under warranty use:

Labor Operation	Description	Labor Time
2480118 *	Replace vacuum pump, vacuum pump to booster hose, vacuum brake booster, and brake master cylinder	2.8 hr
* This is a unique labor	or operation for bulletin use only. This will not be published in the	e Labor Time Guide.

Please follow this diagnostic or repair process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

Service Bulletin

Bulletin No.: PIT\$361B Deta: Jun-2016

PRELIMINARY INFORMATION

Subject: Diagnostic Tip - Additional Brake Pedal Effort

Models: 2015-2018 Cadillac Escalada Modela

2014 Chevrold 80varado 1500

2015-2018 Chevrolet Silverado 1500, Suburban, Tahoe

2014 GMC Slerre 1500

2015-2018 GMC Sierre 1500, Yulion Models

This Pi was supersided to update the condition and perts list. Please discard PIT5361A.

The following diagnosis might be helpful if the vehicle exhibits the symptom(s) described in this PL

Condition/Concern

In some rare effurtions, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. Also, in some cases a tick or ticking noise may be heard, which may sound like an exhaust manifold leak. While performing normal diagnostics, fluid may be found in the brake boorter and/or the boorter were an line.

Important: Pay close ettention to the fuld and if it is chiarmined to be engine all, it could be coming from the vacaum pump. The vacaum pump is belt-driven and mounted to the side of the engine block. It is lubricated by presented engine oil.

Recommendation/instructions

if angine oil is found, it is important the following parts are replaced. If not, the condition will return.

- 1. Vacuum Pump
- 2. Vacuum Line between the booster and the pump
- 3. Brake Booster
- 4. Mester Cylinder
- 5. Vacuum Pump Belt

Parts Information

Part Number	Coccitetion	₩
12553488	PUNP ASM.VAC	1
23144536 (VYU) or 28136228 (w/o VYU)	PIPE ASM-P/B 9003 VAC	1
23136220	GOOSTER ASIM-P/B	1
20926768	CYI-INDER-BRK MAS	1

12658179 BELT - VAC PUMP

26581/9 BELT - VAC POMP

BELT - A/C COMPRESSOR

Warranty Information

For vehicles repaired under warranty use:

12658178

Labor Operation Description Labor Time

2480118 * Replace vacuum pump, bells, vacuum pump to booster hose, vacuum brake booster, and brake master cylinder

Please follow this diagnostic or repair process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

Additional SI Keywords

C0299

GM bulletins are intended for use by professional technicians, NOT a "do-it-yourseffer". They are written to inform these technicians of conditions that may occur on some vehicles, or to provide information that could assist in the proper service of a vehicle. Properly trained technicians have the equipment, tools, safety instructions, and know-how to do a job properly and safety. If a condition is described, DO NOT assume that the bulletin applies to your vehicle, or that your vehicle will have that condition. Sea your GM dealer for information on whether your vehicle may benefit from the information.

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^{*} This is a unique labor operation for bulletin use only.

2015 <u>Chevroiet Suburban - 2WD [1GNSCKKC8</u>FR500471] | <u>Escalade, Escalade ESV, Suburban, Tahoe, Yukon, Yukon XL Service Manual 7527571 | View All Builetins |</u>

Document ID: 4748532

#PIT5361C: Diagnostic Tip - Additional Brake Pedal Effort - (Mar 15, 2017)

Subject: Diagnostic Tip - Additional Brake Pedal Effort



Buand.	Madali	Model	Year:	v	IN:		
Brand:	Model:	from	to	from	to	- Engine:	Transmission:
Cadillac	Escalade	2015-201	6	All	All	All	All
Chevrolet	Silverado 1500	2014-201	6	All	All	All	All
Chevrolet	Suburban	2015-201	6	All	All	All	All
Chevrolet	Tahoe	2015-201	6	All	AII	All	All
GMC	Sierra 1500	2014-201	6	All	All	All	All
GMC	Yukon	2015-201	6	All	All	All	All

Supersession Statement

This PI was superseded to update the parts list. Please discard PIT5361B.

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Condition/Concern

Warning some rare situations, a customer may comment on a hard brake pedal or that increased effort is needed to depress the brake pedal. Also, in some cases a tick or ticking noise may be heard, which may sound like an exhaust manifold leak. While performing normal diagnostics, fluid may be found in the brake booster and/or the booster vacuum line.

Important: Pay close attention to the fluid and if it is determined to be engine oil, it could be coming from the vacuum pump. The vacuum pump is belt-driven and mounted to the side of the engine block. It is lubricated by pressurized engine oil.

Recommendation/Instructions

If engine oil is found, it is important the following parts are replaced. If not, the condition will return.

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- 1. Vacuum Pump
- 2. Vacuum Line between the booster and the pump
- 3. Brake Booster
- 4. Master Cylinder

Parts Information

Part Number	Description	Qty
12669488	PUMP ASM-VAC	1
23144638 (VYU) or 23135228 (w/o VYU)	PIPE ASM-P/B BOOS VAC	1
23135220	BOOSTER ASM-P/B	1
20925765	CYLINDER-BRK MAS	1

Warranty Information

For vehicles repaired under warranty use:

Labor Operation	Description	Labor Time
2480118 *	Replace vacuum pump, vacuum pump to booster hose, vacuum brake booster, and brake master cylinder	2.8 hr
* This is a unique labor	operation for bulletin use only.	

Please follow this diagnostic or repair process thoroughly and complete each step. If the condition exhibited is resolved without completing every step, the remaining steps do not need to be performed.

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EXHIBIT "B"



2015 CHEVROLET SUBURBAN 1500



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INVESTIGATIONS MANUFACTURER COMMUNICATIONS COMPLAINTS RECALLS 914 Manufacturer Communications for 2015 CHEVROLET SUBURBAN 1500 FILTER MANUFACTURER COMMUNICATIONS BY AFFECTED COMPONENTS All (914) AIR BAGS (2) BACK OVER PREVENTION (4) ELECTRICAL SYSTEM (271) ELECTRONIC STABILITY CONTROL (2) ENGINE (96) ENGINE AND ENGINE COOLING (48) EQUIPMENT (346) EQUIPMENT ADAPTIVE (64) EXTERIOR LIGHTING (4) FORWARD COLLISION AVOIDANCE (1) | FUEL SYSTEM, DIESEL (1) | FUEL SYSTEM, GASOLINE (26) | FUEL SYSTEM, OTHER (16) FUEL/PROPULSION SYSTEM (1) INTERIOR LIGHTING (1) LANE DEPARTURE (3) LATCHES/LOCKS/LINKAGES (5) PARKING BRAKE (4) POWER TRAIN (56) SEAT BELTS (3) SEATS (23) SERVICE BRAKES (10) SERVICE BRAKES, AIR (4) SERVICE BRAKES, ELECTRIC (2) SERVICE BRAKES, HYDRAULIC (10) STEERING (24) STRUCTURE (44) SUSPENSION (31) TIRES (15) TRACTION CONTROL SYSTEM (1) TRAILER HITCHES (2) VEHICLE SPEED CONTROL (3) VISIBILITY (26) WHEELS (14) March 14, 2017 MANUFACTURER COMMUNICATION NUMBER: PIT5509B \oplus **Components: ELECTRICAL SYSTEM, SERVICE BRAKES** June 27, 2016 MANUFACTURER COMMUNICATION NUMBER: PIT5361B **Components: SERVICE BRAKES NHTSA ID Number:** 10081053 **Manufacturer Communication Number: PIT5361B Summary** THIS PRELIMINARY INFORMATION COMMUNICATION PROVIDES INFORMATION TO THE TECHNICIAN ON THE STEPS TO DIAGNOSE AND REPAIR VEHICLES THAT MAY HAVE ISSUES WERE THE CUSTOMER WILL NEED INCREASED EFFORT TO DEPRESS THE BRAKE PEDAL. TECHNICIAN MAY FIND FLUID IN THE BRAKE BOOSTER AND/OR THE BOOSTER VACUUM LINE. TECHNICIAN WILL NEED TO REPLACE VACUUM PUMP, BRAKE BOOSTER, MASTER CYLINDER, VACUUM PUMP BELT AND THE VACUUM LINE BETWEEN THE BOOSTER AND THE PUMP.

14 Affected Products -

Vehicles

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015-2016

4 of 7 10/18/2017, 3:57 PM

CHEVROLET TAHOE 2015-2016 GMC SIERRA 1500 2014-2016 GMC YUKON 2015-2016 1 Associated Document - Service Bulletin Document SB-10081053-2280.pdf 95.829KB Request Research (Services fees apply) February 15, 2016 Manufacturer communication number: PIT5377D Components: SERVICE BRAKES HTSA ID Number: 10096208 Manufacturer Communication Number: PIT5361A	February 10, 2016 MA Components: SER NHTSA ID Number: 100	ANUFACTURER COMMUNICATION NUMBER: PIT5361A EVICE BRAKES 096208		Θ	
CHEVROLET SUBURBAN 2015-2016 CHEVROLET TAHOE 2015-2016 GMC SIERRA 1500 2014-2016 GMC YUKON 2015-2016 1 Associated Document → Service Bulletin Document SB-10081053-2280.pdf 95.829KB Request Research (Services fees apply) February 15, 2016 MANUFACTURER COMMUNICATION NUMBER: PITS377D Components: SERVICE BRAKES HTTSA ID Number: 10096208	February 10, 2016 MA Components: SER NHTSA ID Number: 100	ANUFACTURER COMMUNICATION NUMBER: PIT5361A EVICE BRAKES 096208			
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CHEVROLET SUBURBAN 2015-2016 CHEVROLET TAHOE 2015-2016	GMC	YUKON	2015-2016		
CHEVROLET SUBURBAN 2015-2016	GMC	SIERRA 1500	2014-2016		
	CHEVROLET	TAHOE	2015-2016		
	CHEVROLET	SUBURBAN	2015-2016		
CHEVROLET SILVERADO 1500 2014-2016					
		SILVERADO 1500	2014-2016		

5 of 7

MAKE	MODEL	YEAR DENOMINATE AND
CADILLAC	ESCALADE	2015-2016
CADILLAC	ESCALADE ESV	2015-2016
CHEVROLET	SIL:VERADO 1500	2014-2016
CHEVROLET	SUBURBAN	2014-2016
CHEVROLET	TAHOE	2015-2016
GMC	SIERRA 1500	2014-2016
GMC	YUKON	2015-2016
GMC	Y UKON XL	2015-2016
Request Research (Services fees	apply)	
November 10, 2015 NAME COMPONENTS: SERVICE BRAI		(
← prev	Page1 of2	next →

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2015 CHEVROLET SUBURBAN 1500

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EXHIBIT "C"

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2015 CADILLAC ESCALADE ESV



5 ONVESTIGATIONS O

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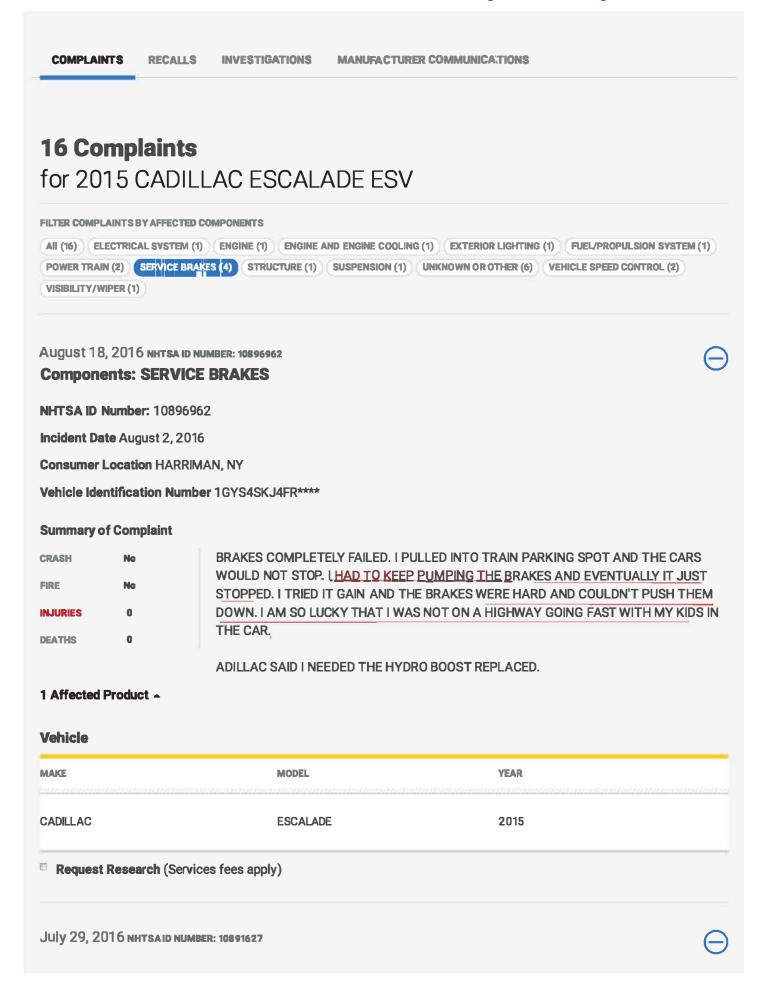
OVERALL SAFETY RATING

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Components: SERVICE BRAKES

NHTSA ID Number: 10891627 Incident Date June 18, 2016

Consumer Location PHOENIX, AZ

Vehicle Identification Number 1GYS4PKJ8FR****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

AT 15000 MILES AND ORIGINAL OWNER WHILE TOWING OUR BRAKES COMPLETELY GAVE OUT. NO WARNING SIGN, NO LEAKAGE, ONLY 1 SYMPTOM A FEW MONTHS PRIOR WHERE THE BRAKE PEDDLE WAS MUSHY. DEALERSHIP SAID IT WAS FINE. EVERYTHING WORKED FINE DRIVING IT THROUGHOUT DAY. STOPPED FOR DINNER JUST BEFORE WE ENTERED MOUNTAIN PASS. GOT IN SUV TO LEAVE FOR HOME AND HAD NO BRAKES AT ALL. EMERGENCY BRAKE WON'T EVEN KICK IN TO BE USED FOR EMERGENCIES. THE VEHICLE GAVE NO WARNING SIGNS, ENGINE OR BRAKE LIGHT WARNINGS. NO CHANGES IN BRAKE PRESSURE, NO LEAKS UNDER VEHICLE OR ON ENGINE. IT WAS AN INSTANT GIVE OUT OF BRAKES AND COULD HAVE HAPPENED WHILE DRIVING. FORTUNATELY THEY DID NOT GIVE OUT WHILE MOVING MORE THAN 3 MPH SO WE ARE STILL ALIVE. DEALERSHIP AND GM BOTH SAID IT WAS NORMAL FOR BRAKES TO GIVE OUT AND NOT HAVE ANY BRAKES WHEN THE BRAKE MASTER CYLINDER GIVES OUT. THIS IS NOT NORMAL! THEY REPLACED THE MASTER CYLINDER AND ALL WORKS FINE NOW. HOWEVER I FEEL THIS IS A MAJOR VEHICLE SAFETY ISSUE IN THAT FOR A VEHICLE TO COMPLETELY LOSE ALL OF IT'S BRAKING ABILITY BUT NOT BE PREWARNED THAT THERE IS A PROBLEM IS EXTREMELY DANGEROUS. IF WE DIDN'T STOP FOR DINNER THE BRAKES WOULD HAVE GIVEN OUT IN THE MOUNTAIN PASS AND ME AND MY FAMILY WOULD MORE THAN LIKELY BE DEAD AT THE BOTTOM OF A MOUNTAIN CLIFF! WE ARE EXTREMELY AFRAID TO DRIVE THIS VEHICLE NOW AND GM HAS NO INTEREST IN BUYING IT BACK OR HELPING US GET OUT OF IT. THEY JUST SAID "JUST WAIT TO SEE IF IT HAPPENS AGAIN" WHICH TO ME, MEANS, WAIT UNTIL YOU CAUSE A FATALITY. THEY ALSO SAID THIS ISN'T HAPPENING TO OTHER GM VEHICLES.

1 Affected Product -

Vehicle

MAKE	MODEL	YEAR
CADILLAC	ESCALADE	2015

Request Research (Services fees apply)

March 31, 2016 NHTSA ID NUMBER: 10852756

Components: SERVICE BRAKES

NHTSA ID Number: 10852756

Incident Date November 13, 2015

10/18/2017, 3:34 PM 5 of 8

Consumer Location ANAHEIM, CA

Vehicle Identification Number 1GYS4NKJ7FR****

Summary of Complaint

CRASH	No	
FIRE	No	
INJURIES	0	
DEATHS	0	

THE VEHICLE HAD VIRTUALLY NO BRAKES TO STOP IT AND 11,215 MILES. GENERAL MOTORS ALREADY HAD SERVICE WARNINGS OUT TO DEALERS DATED 7/17/2015, GM DOCUMENT ID #4242788. THEY SAY THEY REPLACED PADS AND ROTORS. AT 23,589 MILES THE VEHICLE NEEDED BRAKES AGAIN. SERVICE MANAGER TELLS US THAT THIS IS A KNOWN PROBLEM AT GENERAL MOTORS. THEY HAVE EVEN ISSUED A NEW WARNING FOR 2016 MODELS. I CONSIDER THE VEHICLE TO BE UNSAFE TO DRIVE IN THAT THE BRAKES CAN GO OUT WITHOUT ANY WARNING.

1 Affected Product -

V'ehicle

MAKE	MODEL (time) per interpretation de la company d	YEAR itminishininsikininsikininsikininsikininsikininsikininsiki
CADILLAC	ESCALADE	2015

Request Research (Services fees apply)

November 23, 2015 NHTSA ID NUMBER: 10795343

Components: SERVICE BRAKES, SUSPENSION, POWER TRAIN



Recently Searched

2015 CADILLAC ESCALADE B6V

SUV AWD

Not been rated
OVERALL SAFETY RATING



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2016

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2015 CHEVROLET SUBURBAN 1500



7 ONVESTIGATIONS 0
RECALLS COMPLAINTS 96



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COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS 96 Complaints for 2015 CHEVROLET SUBURBAN 1500 FILTER COMPLAINTS BY AFFECTED COMPONENTS All (96) AIR BAGS (5) ELECTRICAL SYSTEM (12) ELECTRONIC STABILITY CONTROL (3) ENGINE (10) EQUIPMENT (1) EQUIPMENT ADAPTIVE (2) EXTERIOR LIGHTING (4) FUEL/PROPULSION SYSTEM (6) POWER TRAIN (11) SEAT BELTS (1) SEATS (4) SERVICE BRAKES (18) STEERING (12) STRUCTURE (13) SUSPENSION (6) TIRES (1) UNKNOWN OR OTHER (20) VEHICLE SPEED CONTROL (1) VISIBILITY (2) VISIBILITY/WIPER (2) WHEELS (3) October 1, 2017 NHTSA ID NUMBER: 11030722 **Components: SERVICE BRAKES NHTSA ID Number:** 11030722 Incident Date June 29, 2017 Consumer Location LAC DU FLAMBEAU, WI **Vehicle Identification Number 1GNSKKKC7FR**** Summary of Complaint** WHILE DRIVING ON 190 IN STOP AND GO TRAFFIC, THE CAR IN FRONT OF ME STOPPED. I **CRASH** APPLIED MY BRAKES AND THE PEDAL WAS HARD AND WOULD NOT DEPRESS. AS A **FIRE** RESULT MY CAR WOULD NOT STOP AND I HIT THE CAR IN FRONT OF ME IN THE REAR END. MY AIR BAGS WENT OFF. I RECEIVED AN AIR BAG BURN. THE CAR IN FRONT OF ME **INJURIES** STRUCK THE CAR IN FRONT OF HIM. BOTH OTHER DRIVERS CLAIM THEY WERE **DEATHS** INJURED. MY CAR COST \$15,300 TO REPAIR. CHEVROLET IS AWARE OF THIS PROBLEM, ISSUING PRELIMINARY SERVICE BULLETIN PIT5361 IN 2015, ADDENDUM B IN 2016 AND ADDENDUM B IN 2017. THE PROBLEM IS A FAULTY VACUUM PUMP, MASTER CYLINDER, BRAKE BOOSTER, VACUUM LINE, AND VACUUM PUMP BELT. I WAS NEVER INFORMED OF THIS PROBLEM. I HAVE BEEN DRIVING 50 YEARS AND THIS IS MY FIRST CHARGEABLE ACCIDENT. 1 Affected Product A **Vehicle** MAKE MODEL YEAR

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2015

SUBURBAN

CHEVROLET

Request Research (Services fees apply) September 26, 2017 NHTSA ID NUMBER: 11030016 Components: SERVICE BRAKES **NHTSA ID Number: 11030016** Incident Date September 26, 2017 **Consumer Location LLANO, TX Vehicle Identification Number 1GNSCKKC7FR**** Summary of Complaint** TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE EXITING THE **CRASH** PARKING LOT AT 5 MPH, THE BRAKES FAILED TO WORK WITHOUT WARNING. THE **FIRE** CONTACT HAD TO CHANGE THE GEAR TO PARK IN ORDER TO STOP THE VEHICLE. THE VEHICLE WAS TOWED TO THE DEALER (BOB PRICE CHEVROLET BUICK GMC, 1225 S **INJURIES** STATE HWY 16, FREDERICKSBURG, TX 78624) WHERE IT WAS DIAGNOSED THAT THE **DEATHS** BRAKE BOOSTER AND THE BRAKE PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS NOT CONTACTED. THE APPROXIMATE FAILURE MILEAGE WAS 51,800. 1 Affected Product -**Vehicle** MAKE MODEL **YEAR CHEVROLET SUBURBAN** 2015 Request Research (Services fees apply) August 28, 2017 NHTSA ID NUMBER: 11020065 **Components: SERVICE BRAKES NHTSA ID Number: 11020065** Incident Date August 18, 2017 **Consumer Location CENTERVILLE, MA** Vehicle Identification Number 1GNSKKKC0FR**** **Summary of Complaint** CRASH THE BRAKES ON MY 2015 CHEVY SUBURBAN ARE LOCKING WHEN DRIVING A LOW No SPEED. THE PROBLEM STARTED ALL OF THE SUDDEN WHILE DRIVING UNDER DRY ROAD **FIRE** CONDITIONS ON A CITY STREET. IF YOU PRESS ON THE BRAKE PEDAL IT DOES NOT MOVE AND THE CAR DOES NOT STOPPED. I ALMOST HIT A FAMILY OF 4 THAT WAS **INJURIES**

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DEATHS	0	CROSSING IN FRONT OF ME. THE CAR HAS BEEN AT DICK BEARD CHEVROLET IN HYANNIS, MA AND THEY ARE SAYING THAT THERE IS NO ISSUE WITH THE BRAKES AND AVOIDING SOLVING THE PROBLEM. I'VE CALLED CHEVROLET 4 TIMES AND THEY ARE NOT CALLING ME BACK. THE CAR IS NOT SAFE TO DRIVE AT ALL.		
1 Affected	Product •			
Vehicle				
MAKE		MODEL	YEAR	oeneneneno
CHEVROLET		SUBURBAN	2015	
□ Request	t Research (Servi	ices fees apply)		
	2017 NHTSAID NUI ents: SERVIC			Θ
NHTSA ID	Number: 109957	718		
	ate June 17, 201			
	Location MCQUI			
Vehicle Ide	entification Numi	ber 1GNSCJKC3FR****		
Summary o	of Complaint			
CRASH	No	BRAKE BOOSTER WENT OUT WHIL	E DRIVING WITH MY CHILDREN IN THE CA	R!
FIRE	No			
INJURIES	0			
DEATHS	0			
1 Affected	Product -			
Vehicle				
MAKE	trostroresserrancestr	MODEL	YEAR	ensensummen
CHEVROLET		SUBURBAN	2015	
Request Research (Services fees apply)				
	2017 NHTSAID NUI ents: SERVIC			Θ

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NHTSA ID Number: 10995134

Incident Date October 14, 2016

Consumer Location GAINESVILLE, FL

Vehicle Identification Number 1GNSCJKC4FR****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

BRAKES STOPPED WORKING. FIRST TIME IT HAPPENED I THOUGHT IT WAS MY
IMAGINATION AS I WAS IN A PARKING LOT GOING EXTREMELY SLOW. NEXT DAY IT
HAPPENED WHEN BACKING OUT OF MY DRIVEWAY. HAD TO PRESS BRAKES
EXTREMELY HARD AND IT ROLLED TO A STOP AS IT HIT CURB ON OTHER SIDE OF ROAD.
TOOK IT TO DEALER AND THEY REPLACE THE VACUUM BOOSTER WHICH HAD FAILED
AT APROX. 50,000 MILES. NOT COVERED UNDER WARRANTY. EVERY OTHER PART OF
BRAKES BESIDES NORMAL WEAR AND TEAR IS COVERED. I WAS LUCKY IT HAPPENED IN
MY DRIVEWAY AND NOT WHILE DRIVING AT HIGHER SPEEDS IN TRAFFIC.

I HAVE ADDITIONAL COMPLAINTS ABOUT THIS VEHICHLE. THE CLIPS HOLDING DRIVERS SEAT HAD TO BE REPLACED AT 40,000 MILES BECAUSE SEAT WAS SLIDING FROM SIDE TO SIDE. THEY ARE ALL READY LOOSE AGAIN AT 60,000 MILES ALTHOUGH NOT AS BAD AS FIRST TIME. MY AC CONDENSER WENT OUT AT 62,000 MILES. IT HAS BEEN ON NATIONAL BACKORDER FOR 7 WEEKS AND I AM STILL WAITING. THE CAR SHAKES ON THE INTERSTATE AT APROX 70 -75 MILES PER HOUR. THE DEALERSHIP HAS BALANCED THE TIRES AND THIS HAS NOT FIXED PROBLEM. AFTER DRIVING ON INTERSTATE AT HIGH SPEEDS FOR EXTENDED PERIOD OF TIME, WHEN STOPPING THE CAR IDLES VERY ROUGH AND HAS EVEN CUT OFF. THE DEALERSHIP RAN A FUEL INDUCTION SERVICE. WILL SEE IF IT WORKS WHEN I GET IT BACK AFTER THEY REPLACE AC CONDENSER. THE CAR SHIFTS HORRIBLY, ESPECIALLY WHEN GOING SLOW. WAS TOLD THAT IS A PROBLEM WITH THE FUEL EFFICIENT SHIFTING AND THERE IS NO REPAIR...JUST TO MANUALLY SHIFT. ALSO, THE HOOD OF THE CAR HAS TINY RUST SPOTS COMING THROUGH THE PAINT ALL OVER IT.

1 Affected Product -

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

Request Research (Services fees apply)

← prev Page 1 of 4 next →

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COMPLAINTS **RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS 96 Complaints** for 2015 CHEVROLET SUBURBAN 1500 FILTER COMPLAINTS BY AFFECTED COMPONENTS All (96) AIR BAGS (5) ELECTRICAL SYSTEM (12) ELECTRONIC STABILITY CONTROL (3) ENGINE (10) EQUIPMENT (1) EQUIPMENT ADAPTIVE (2) EXTERIOR LIGHTING (4) FUEL/PROPULSION SYSTEM (6) POWER TRAIN (11) SEAT BELTS (1) SEATS (4) SERVICE BRAKES (18) STEERING (12) STRUCTURE (13) SUSPENSION (6) TIRES (1) UNKNOWN OR OTHER (20) VEHICLE SPEED CONTROL (1) VISIBILITY (2) VISIBILITY/WIPER (2) WHEELS (3) April 10, 2017 NHTSA ID NUMBER: 10971549 Components: SERVICE BRAKES, ENGINE, VEHICLE SPEED CONTROL **NHTSA ID Number:** 10971549 Incident Date April 8, 2017 Consumer Location LORTON, VA **Vehicle Identification Number 1GNSKJKCXFR**** Summary of Complaint** I WAS ON SLOPE HILL. MY. BRAKES ARE NOT RESPONDING. I PUT IN NEW BRAKES 2 **CRASH** MONTHS AGO AND BRAKES NOT RESPONDING? MY CAR ALMOST WENT DOWN THE **FIRE** HILL. I CALLED ROADSIDE ASSISTANCE AND HAD THEM TOWED MY CAR TO **INJURIES** DEALERSHIP. THEY FOUND THE ISSUE VACUUM PUMP BROKE, ALSO MY TRANSMISSION HAVING ISSUE SINCE 2 MONTHS. THEY STILL HAVEN'T FOUND ISSUES. **DEATHS** I CAN'T CONTROL MY SPEED AND ENGINE GIVES A KICK WHEN ENTERING HIGHWAY. THEY WON'T REPAIR THIS ISSUE BECAUSE THEIR "MECHANICS" CANNOT FIND THE ISSUE. THIS IS THIS WORST VEHICLE TO DRIVE ANDUNSAFE FOR DRIVERS AND PASSENGERS. 1 Affected Product -**Vehicle** MAKE **MODEL YEAR** CHEVROLET **SUBURBAN** 2015 Request Research (Services fees apply)

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February 28, 2017 NHTSA ID NUMBER: 10957711

Components: SERVICE BRAKES

Components: SERVICE BRAKI

NHTSA ID Number: 10957711
Incident Date February 28, 2017

Consumer Location TEXARKANA, TX

Vehicle Identification Number 1GNSCKKC8FR****

Summary of Complaint

CRASH	Yes
FIRE	No
INJURIES	2
DEATHS	0

WHILE DRIVING HER VEHICLE TODAY MY WIFE DEPRESSED HER BRAKE TO STOP AND SHE SAID THE BRAKE FELT LIKE PUSHING ON A RUBBER TIRE. THE CAR WOULD NOT STOP CAUSING HER TO RUN A STOP SIGN AND HIT ANOTHER VEHICLE. WE HAD THE SAME PROBLEM LAST MONTH AND THE VEHICLE WAS TAKEN TO THE CHEVROLET DEALERSHIP AND "REPAIRED" ACCORDING TO THE CURRENT SAFETY BULLETIN ISSUED BY CHEVROLET. THIS COLLISION CAUSED THE OTHER PERSON TO GO TO THE HOSPITAL VIA EMS AND MY WIFE WAS TAKEN BY POV TO ER FOR EVALUATION.

OBVIOUSLY WHATEVER "FIX" WAS DONE BY THE DEALERSHIP WAS NOT THE CAUSE OF THE PROBLEM. I WAS TOLD THE VACUUM ASSIST PUMP AND HOSES WERE REPLACED, BUT THE VEHICLE STILL HAD THE SAME ISSUE.

1 Affected Product -

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	SUBURBAN	2015

Request Research (Services fees apply)

February 23, 2017 NHTSA ID NUMBER: 10956664

Components: SERVICE BRAKES, ELECTRONIC STABILITY CONTROL, SUSPENSION



NHTSA ID Number: 10956664
Incident Date January 15, 2016

Consumer Location COVINA, CA

Vehicle Identification Number 1GNSCKKC4FR****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

CAR ONLY HAS 60,000 MILES BRAKE BOOSTER IS GOING OUT AND CHEVY KNOWS THERE IS A PROBLEM BUT HAVE NOT RECALLED. ALSO FRONT SHOCKS ARE GOING OUT DUE TO MAGNETIC RIDE SYSTEM LOTS OF PEOPLE HAVE THE SAME PROBLEM CHEVY ONCE AGAIN HAS NOT RECALLED!

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November 28, 2016 NHTSA ID NUMBER: 10928435 Components: SERVICE BRAKES NHTSA ID Number: 10928435 Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS.	1 Affected	Product •			
CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) November 28, 2016 Nertsa id Number: 10928436 Components: SERVICE BRAKES NHTSA ID Number: 10928435 Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No IHAVE A 2015 CHEVY. SUBURBAN LITTHE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. NUMBER 0 DEATHS 0 1 Affected Product ~ Vehicle MAME MODEL YEAR CHEVROLET SUBURBAN 2015 CREQuest Research (Services fees apply) October 3, 2016 Nertsa ID Number: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	Vehicle				
Request Research (Services fees apply) November 28, 2016 NetTsA ID NUMBER: 10928A35 Components: SERVICE BRAKES NHTSA ID Number: 10928435 Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. NUMBER 0 1 Affected Product - Vehicle MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NetTsA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	MAKE		MODEL	YEAR	
November 28, 2016 NHTSA ID NUMBER: 10928435 Components: SERVICE BRAKES NHTSA ID Number: 10928435 Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No IHAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. NUMBER 0 DEATHS 0 HARFELD NOBEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NHTSA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	CHEVROLET		SUBURBAN	2015	
Components: SERVICE BRAKES NHTSA ID Number: 10928435 Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. MAURIES 0 DEATHS 0 I Affected Product A Vehicle MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 Nettsa ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	□ Request	Research (Service	ces fees apply)		
NHTSA ID Number: 10928435 Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY, SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. NAURIES 0 DEATHS 0 1 Affected Product A Vehicle MAME MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NHTSA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	Novembe	r 28, 2016 nhtsa	ID NUMBER: 10928435		
Incident Date November 28, 2016 Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACED THIS IS VERY DANGEROUS. NUMBER 0 1 Affected Product A Vehicle MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NHTSAID NUMBER: 10911185 Components: SERVICE BRAKES NHTSAID Number: 10911185 Incident Date October 1, 2016	Compone	ents: SERVICI	E BRAKES		
Consumer Location HARVEY, LA Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBLIRBAN LT.THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL. THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. INJURIES 0 DEATHS 0 1 Affected Product A Vehicle MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 Nettsa ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	NHTSA ID I	Number: 109284:	35		
Vehicle Identification Number IGNSCIKC6FR**** Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. NJURIES 0 DEATHS 0 1 Affected Product ~ Vehicle MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NHTSA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	Incident Da	ite November 28,	2016		
Summary of Complaint CRASH No I HAVE A 2015 CHEVY. SUBURBAN LT THE BRAKE PEDAL IS HARD TO PRESS AND THE CAR CONTINUE TO ROLL EVEN AFTER I APPLY THE BRAKE DESPITE THE ROTOR AND ALL THE PADS HAVE BEEN REPLACEDTHIS IS VERY DANGEROUS. NUURIES 0 DEATHS 0 1 Affected Product ~ Vehicle MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NHTSA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	Consumer	Location HARVE	Y, LA		
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MAKE MODEL YEAR CHEVROLET SUBURBAN 2015 Request Research (Services fees apply) October 3, 2016 NHTSA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	1 Affected	Product •			
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October 3, 2016 NHTSA ID NUMBER: 10911185 Components: SERVICE BRAKES NHTSA ID Number: 10911185 Incident Date October 1, 2016	CHEVROLET		SUBURBAN	2015	
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Incident Date October 1, 2016					\in
	NHTSA ID I	Number: 1 091118	35		
Consumer Location BOCA RATON, FL	Incident Da	ite October 1, 201	16		
	Consumer	Location BOCA R	ATON, FL		

Vehicle Identification Number 1GNSCJKC8FR**** **Summary of Complaint** TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. THE CONTACT STATED THAT CRASH WHILE DRIVING AT 60 MPH, THE BRAKE PEDAL WAS DEPRESSED AND THE VEHICLE **FIRE** HESITATED TO REDUCE IN SPEED. THE VEHICLE WAS TOWED TO THE DEALER WHERE IT INJURIES WAS DIAGNOSED THAT THE BRAKE BOOSTER FAILED. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 67,000. DEATHS 1 Affected Product -**Vehicle** MAKE MODEL YEAR CHEVROLET **SUBURBAN** 2015 Request Research (Services fees apply) ← prev Page 2 of 4 $next \rightarrow$

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2015 CHEVROLET SUBURBAN 1500

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COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

96 Complaints

for 2015 CHEVROLET SUBURBAN 1500

FILTER COMPLAINTS BY AFFECTED COMPONENTS

All (96) AIR BAGS (5) ELECTRICAL SYSTEM (12) ELECTRONIC STABILITY CONTROL (3) ENGINE (10) EQUIPMENT (1)

EQUIPMENT ADAPTIVE (2) EXTERIOR LIGHTING (4) FUEL/PROPULSION SYSTEM (6) POWER TRAIN (11) SEAT BELTS (1) SEATS (4)

SERVICE BRAKES (18) STEERING (12) STRUCTURE (13) SUSPENSION (6) TIRES (1) UNKNOWN OR OTHER (20)

VEHICLE SPEED CONTROL (1) VISIBILITY (2) VISIBILITY/WIPER (2) WHEELS (3)

September 8, 2016 NHTSA D NUMBER: 10904757

Components: SERVICE BRAKES

NHTSA ID Number: 10904757

Incident Date September 7, 2016

Consumer Location BROCKTON, MA

Vehicle Identification Number 1GNSKHKC7FR****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

I AM WRITING ABOUT MY 2015 CHEVY SUBURBAN. I OWN A LIMOUSINE SERVICE AND USE THE SUBURBAN IN MY FLEET. YESTERDAY A DRIVER, WITH PASSENGERS, HAD A TOTAL FAILURE OF THE POWER BRAKING SYSTEM. IT IS AT A LOCAL REPAIR SHOP NOW, AND I AM BEING TOLD THE AIR PUMP HAD BROKEN APART, INSIDE, SNAPPED THE FAN BELT RESULTING IN NO VACUUM GETTING TO THE POWER BRAKE SYSTEM. MY DRIVER WAS BARELY ABLE TO STOP THE VEHICLE BEFORE REAR ENDING ANOTHER CAR ON THE HIGHWAY. THE VEHICLE HAS 54,000 MILES AND I AM BEING TOLD IS OUT OF THE BUMPER TO BUMPER WARRANTY. THERE ARE ALSO NO OPEN RECALLS. I AM REPORTING THIS ISSUE TO THE NHTSA AND THE MASSACHUSETTS ATTORNEY GENERAL'S OFFICE, AS I BELIEVE THIS IS AN IMMEDIATE DANGER TO THE GENERAL MOTORING PUBLIC. I JUST CONTACTED CHEVROLET BY PHONE AND EMAIL. THE REPRESENTATIVE ON THE PHONE SAID ALL SHE COULD TELL ME IS THAT IT'S OUT OF WARRANTY, THERE WERE NO RECALLS, AND I AM BASICALLY ON MY OWN TO REPAIR. I HOPE YOU ARE ABLE TO INVESTIGATE THIS SITUATION, IDENTIFY THE CAUSE OF THIS FAILURE, AND COME UP WITH A REMEDY FOR THE SAFETY OF EVERYONE.

1 Affected Product -

Request Research (Services fees apply)

September 8, 2016 NHTSA ID NUMBER: 10904602



Components: EXTERIOR LIGHTING, AIR BAGS, SERVICE BRAKES

July 24, 2016 NHTSAID NUMBER: 10888039

Components: ELECTRICAL SYSTEM, ENGINE, SERVICE BRAKES



March 15, 2016 NHTSA ID NUMBER: 10849844

Components: POWER TRAIN, SERVICE BRAKES, ELECTRICAL SYSTEM, STRUCTURE



NHTSA ID Number: 10849844

Incident Date July 18, 2015

Consumer Location Unknown

Vehicle Identification Number 1GNSCJKC9FR****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. WHILE ATTEMPTING TO BRAKE THE VEHICLE, THE BRAKES MADE AN ABNORMAL LOUD NOISE. THE VEHICLE WAS TAKEN TO THE DEALER WHERE IT WAS DIAGNOSED THAT THE BRAKES AND ROTORS NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED; HOWEVER, THE FAILURE RECURRED. THE CONTACT STATED THAT THE BRAKES AND ROTORS HAD BEEN REPLACED A TOTAL OF THREE TIMES SINCE THE PURCHASE OF THE VEHICLE. ALSO, WHILE ATTEMPTING TO ACCELERATE, THE VEHICLE HESITATED AND SLOWED DOWN. THE VEHICLE WAS TAKEN TO THE DEALER. THE CONTACT WAS INFORMED THAT THE VEHICLE HAD NOT FAILED AND THAT WAS HOW IT WAS CALIBRATED. THE CONTACT ALSO STATED THAT THE LIFTGATE FAILED TO OPEN AUTOMATICALLY AND HAD TO BE MANUALLY OPERATED. THE VEHICLE WAS TAKEN TO THE DEALER, BUT THE FAILURE COULD NOT BE DUPLICATED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURES. THE FAILURE MILEAGE WAS 43,000.

1 Affected Product -

Request Research (Services fees apply)

January 4, 2016 NHTSAID NUMBER: 10817620

Components: STEERING, SERVICE BRAKES



NHTSA ID Number: 10817620

Incident Date December 12, 2015

Consumer Location SEAFORD, NY

Vehicle Identification Number 1GNSCJKC9FR****

Summary of Complaint

CRASH	Yes
FIRE	No

TL* THE CONTACT OWNS A 2015 CHEVROLET SUBURBAN. THE CONTACT STATED THAT WHILE MAKING A LEFT TURN AT 20 MPH, THE BRAKE PEDAL WAS DEPRESSED AND

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FAILED TO RESPOND AS THE VEHICLE ACCELERATED WITHOUT WARNING. IN ADDITION,

THE CONTACT STATED THAT THE POWER STEERING FAILED. AS A RESULT, THE

CONTACT CRASHED INTO ANOTHER VEHICLE. A POLICE REPORT WAS FILED. THE

CONTACT SUSTAINED HEAD, NECK, BACK AND WRIST INJURIES THAT REQUIRED

MEDICAL ATTENTION. THE VEHICLE WAS TOWED BUT WAS NOT DIAGNOSED OR

REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE

MILEAGE WAS 46,000.

1 Affected Product ▼

Request Research (Services fees apply)

← prev

Page 3 of 4

Recently Searched

2015 GMC YUKON DENALI XL 1500

SUV 4 WD





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2015 CHEVROLET SUBURBAN 1500

SUV R WD





OEWEX IMAGES



2015 CHEVROLET TAHOE



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10 RECALLS ONVESTIGATIONS 0

COMPLAINTS 13

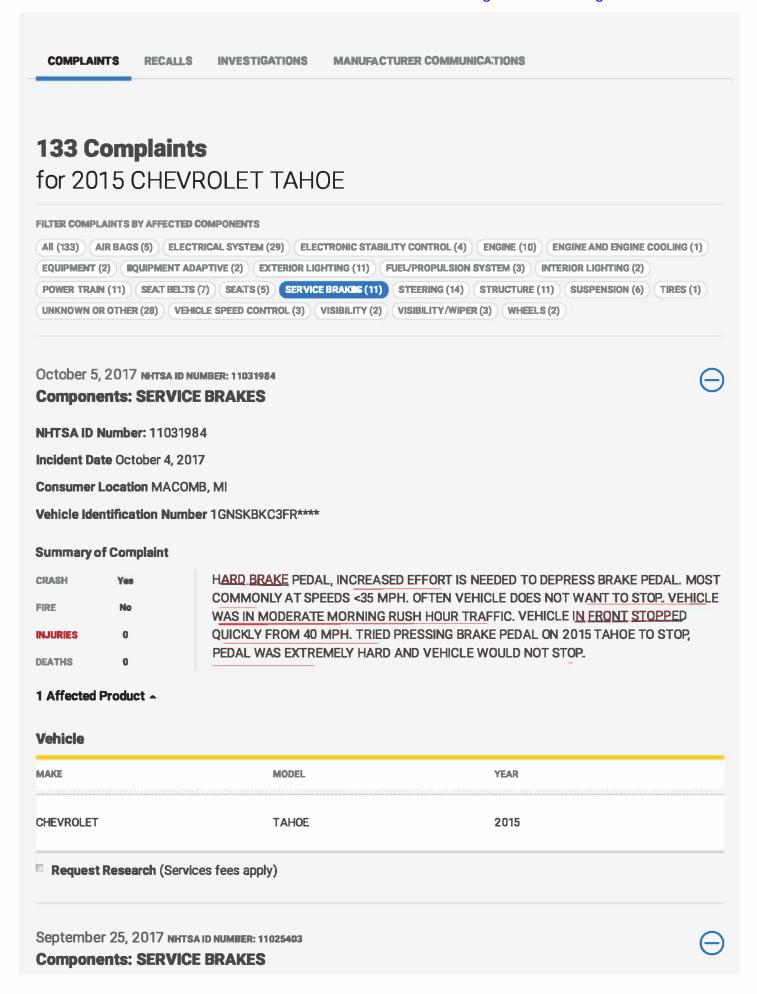


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Case 5:18-cv-02153 Document 1 Filed 10/09/18 Page 79 of 96 Page ID #:79



NHTSA ID Number: 11025403

Incident Date September 22, 2017

Consumer Location TIFTON, GA

Vehicle Identification Number 1GNSCBKC4FR****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

AS I WAS SITTING IN THE VEHICLE IN PARK, I PLACED MY FOOT ON THE BRAKE AND NOTICED THAT THE BRAKE ASSIST HAD ACTIVATED WHILE IN PARK. I WAS UNABLE TO PUSH THE PETAL DOWN. I WAS ABLE TO MOVE THE SHIFTER INTO DRIVE WITH MY FOOT ON THE BRAKE, BUT THE VEHICLE IMMEDIATELY PLUNGED FORWARD. AS I CONTINUED TO TRY AND DEPRESS THE BRAKE PETAL, THE VEHICLE FINALLY SLOWED TO A STOP. BEFORE I COULD GET OFF THE ROAD AND OUT OF TRAFFIC, THE BRAKE ASSIST CONTINUED TO BE LOCKED UP AND THERE WAS NO BRAKES IF I SHIFTED INTO REVERSE. I WAS EXTREMELY CONCERNED FOR MINE AND MY CHILDREN'S SAFETY AS THIS COULD HAVE CAUSED A VERY SERIOUS ACCIDENT. THE BRAKES DID NOT STOP THE VEHICLE AND WERE DEFECTIVE DUE TO THE VACUUM PUMP "GOING OUT". THE VEHICLE IS ONLY 2 YEARS OLD AND HAS 49K MILES.

1 Affected Product -

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	ТАНОЕ	2015

Request Research (Services fees apply)

September 11, 2017 NHTSA ID NUMBER: 11022709

Components: SERVICE BRAKES



Incident Date September 10, 2017

Consumer Location MONSEY, NY

Vehicle Identification Number 1GNSK2EC4FR****

Summary of Complaint

Yes
No
0
0

WHEN APPLYING THE BRAKES MY CAR DOESN'T STOP 100% OF THE TIME. 1 TIME DURING HIGHWAY SLOW MOVING TRAFFIC, 3 TIMES BACKING OUT OF MY DRIVEWAY (FLAT SURFACE), 4 TIMES WHEN ON INCLINE/DECLINE OF ROAD. WHEN APPLYING BRAKES, HORRIBLE CHATTERING VIBRATION COMES FROM LEFT FRONT TIRE AREA, CHATTER VIBRATION IS FELT IN BRAKE PEDAL. NO MATTER HOW HARD I APPLY THE BRAKE THE CAR KEEPS GOING - IT WILL FINALLY STOP, BUT I ALMOST HIT THE CAR IN FRONT OF ME AT THE ONE HIGHWAY OCCURRENCE, 2 TIMES CAR FINALLY STOPPED

Case 5:18-cv-02153 Document 1 Filed 10/09/18 Page 81 of 96 Page ID #:81

JUST BEFORE GOING OVER EDGE OF PROPERTY WHEN PULLING FORWARD & BACKWARD TO TURN AROUND IN TIGHT AREA. IN EACH INSTANCE I AM MOVING AT A VERY SLOW SPEED. I CONTACTED DEALERSHIP, THEY TOLD ME I WASN'T THE ONLY ONE CALLING ABOUT THIS HAPPENING BUT SINCE I'M OVER 36,000 WARRANTY THEY WILL CHARGE ME TO CK IT OUT,

1 Affected Product •

Vehicle

MAKE	MODEL	YEAR
CHEVROLET	TAHOE POLICE PURSUIT	2015
Request Research (Services fees apply)	

September 5, 2017 NHTSA ID NUMBER: 11021419

Components: SERVICE BRAKES

NHTSA ID Number: 11021419

Incident Date September 4, 2017

Consumer Location WILLIAMSPORT, PA

Vehicle Identification Number 1GNSKBKC0FR****

Summary of Complaint

CRASH	No	WHILE DRIVING ON THE ROAD IN TRAFFIC I WENT TO PRESS ON THE BRAKES AND
FIRE	No	NOTICED THEY HAD BECOME STIFF AND HAD TO PRESS THEM AS HARD AS POSSIBLE
FIRE	140	TO SLOWLY STOP WHILE TRYING TO AVOID HITTING ANOTHER VEHICLE IN TRAFFIC. NO
INJURIES	0	WARNING LIGHTS WERE ON IN THE DASH UNTIL I PULLED OVER AND RESTARTED
DEATHS	0	VEHICLE A COUPLE OF TIMES. THEN I GOT THE ACTIVE BRAKE ASSIST SERVICE LIGHT
DEATHS	U	ON. I HAD THE VEHICLE TOWED TO THE NEAREST CHEVROLET SERVICE CENTER DUE
		TO THE VEHICLE NOT SAFE TO DRIVE

1 Affected Product -

Vehicle

CHEVROLET	TAHOE	2015	
Request Research (Services	o face apply)		

August 29, 2017 NHTSA ID NUMBER: 11020372

Components: SERVICE BRAKES

NHTSA ID Number: 11020372

Incident Date August 13, 2017

Consumer Location CARMEL, IN

Vehicle Identification Number 1GNSKCKC1FR****

Summary of Complaint

CRASH	No
FIRE	Na
INJURIES	0
DEATHS	0

TL* THE CONTACT OWNS A 2015 CHEVROLET TAHOE. THE CONTACT STATED THAT WHILE DRIVING AT 5 MPH, THE BRAKE PEDAL WAS APPLIED BUT FAILED TO RESPOND WITHOUT WARNING. THE VEHICLE WAS TOWED TO A LOCAL DEALER: COUGHLIN FORD OF CIRCLEVILLE LOCATED AT 24001 US HIGHWAY 23 S CIRCLEVILLE OH 49113 WHERE IT WAS DIAGNOSED THAT THE BRAKE SENSOR NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED BUT THE FAILURE RECURRED. THE VEHICLE WAS THEN TOWED TO HARE CHEVROLET LOCATED AT 2001 STONY CREED RD NOBLESVILLE IN 46060 WHERE IT WAS DIAGNOSED THAT THE VACUUM PUMP NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND OPENED CASE #8-31775454 BUT DID NOT OFFER ANY FURTHER ASSISTANCE. THE FAILURE MILEAGE WAS 31,000.

1 Affected Product -

Vehicle

MAKE	MODEL	YEAR	
CHEVROLET	TAHOE	2015	
Request Research (Ser			
	vires tees anniv i		
Request Research (Ser	vices rees apply)		
Request Research (Ser	vices rees apply)		

Recently Searched

2015 CHEVROLET TAHOE

SUV 4 WD



2016 CHEVROLET SUBURBAN 1500 SUV4WD



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ONVESTIGATIONS 0

COMPLAINTS 2



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COMPLAINTS **RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS** 23 Complaints for 2016 CHEVROLET SUBURBAN 1500 FILTER COMPLAINTS BY AFFECTED COMPONENTS All (23) ELECTRICAL SYSTEM (2) ENGINE (3) FUEL/PROPULSION SYSTEM (1) POWER TRAIN (2) SEAT BELTS (1) SEATS (1) SERVICE BRAKES (2) STEERING (1) STRUCTURE (4) SUSPENSION (3) TIRES (1) UNKNOWN OR OTHER (8) VEHICLE SPEED CONTROL (4) VISIBILITY (1) VISIBILITY/WIPER (1) WHEELS (3) April 4, 2017 NHTSA ID NUMBER: 10970605 \oplus Components: SERVICE BRAKES, ELECTRICAL SYSTEM, VEHICLE SPEED CONTROL March 13, 2017 NHTSA ID NUMBER: 10965728 Components: SERVICE BRAKES, ENGINE, VEHICLE SPEED CONTROL **NHTSA ID Number: 10965728** Incident Date March 13, 2017 Consumer Location LAND O' LAKES, FL **Vehicle Identification Number 1GNSCJKC3GR**** Summary of Complaint** TL* THE CONTACT OWNS A 2016 CHEVROLET SUBURBAN. WHILE DRIVING 30 MPH, THE CRASH VEHICLE FAILED TO ACCELERATE. ALSO, THE BRAKES FAILED TO RESPOND WHEN THE FIRE BRAKE PEDAL WAS DEPRESSED AND THE VEHICLE STALLED. THE FAILURE RECURRED **INJURIES** TWO MORE TIMES. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURES. THE APPROXIMATE FAILURE **DEATHS** MILEAGE WAS 14,000. 1 Affected Product A **Vehicle** MAKE MODEL YEAR CHEVROLET **SUBURBAN** 2016 Request Research (Services fees apply)



2014 CHEVROLET SILVERADO 1500 PU/RC RW/D



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17 RECALLS COMPLAINTS 45



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COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

452 Complaints

for 2014 CHEVROLET SILVERADO 1500

FILTER COMPLAINTS BY AFFECTED COMPONENTS

All (452) AIR BAGS (27) ELECTRICAL SYSTEM (86) ELECTRONIC STABILITY CONTROL (49) ENGINE (58) ENGINE AND ENGINE COOLING (6)

EQUIPMENT (5) EXTERIOR LIGHTING (16) FUEL SYSTEM, GASOLINE (2) FUEL/PROPULSION SYSTEM (9) LATCHOC/LOCKS/LINKAGES (1)

POWER TRAIN (79) SEAT BELTS (20) SEATS (24) SETVICE BRAKES (27) SERVICE BRAKES, HYDRAULIC (1) STEERING (109)

STRUCTURE (40) SUSPENSION (33) TIRES (7) UNKNOWN OR OTHER (54) VEHICLE SPEED CONTROL (15) VISIBILITY (7)

VISIBILITY/WIPER (8) WHEELS (20)

October 16, 2017 NHTSA ID NUMBER: 11033883

Components: SERVICE BRAKES

NHTSAID Number: 11033883
Incident Date October 2, 2017

Consumer Location LA VERNIA, TX

Vehicle Identification Number 3GCPCTEC9EG****

Summary of Complaint

CRASH No
FIRE No
INJURIES 0
DEATHS 0

PER ATTACHED WORK ORDERS, MY BRAKES WERE GOING TO THE FLOOR IN REVERSE ONLY. THEY REPLACED MASTER CYLINDER AND SAID ALL FIXED. SEVERAL WEEKS LATER HAPPENED AGAIN SO NOW REPLACED VACUUM & BOOSTER PUMP. THAT WAS 2 WEEKS AGO. STILL WORKING AND FILED COMPLAINT WITH GM BUT THEY SAID NOTHING THEY COULD DO. THESE HAVE NO MOVING OR MECHANICAL PARTS AND SHOULD PROBABLY NEVER WEAR OUT. PRIOR TO ALL THIS I WAS GETTING A REPORT TO SERVICE ELECTRONIC TRAILER BRAKES BUT HAD NOT HOOKED UP A TRAILER? WHEN FIRST POINTED THIS OUT THEY SAID COULD NOT FIND ANYTHING. SECOND TIME THEY REPLACED ELECTRONIC SWITCH AS "BAD". PERSONALLY I FEEL IT HAD NOTHING TO DO WITH ALL THE PARTS REPLACED AND FEEL STRONGLY THAT THIS IS ELECTRONIC AND RELATED TO THE ABS BRAKING SYSTEM ELECTRONICS OR MOTHER BOARD. VEHICLE WAS IN REVERSE MOVING SLOWLY. DAMAGED REAR BUMPER LAST FAIL DUE TO UNABLE TO STOP VEHICLE. IF SOMEONE WAS BEHIND ME DIRECTING ME THERE IS A GOOD CHANCE THEY COULD HAVE BEEN CRUSHED OR INJURED SERIOUSLY. I FEEL THIS IS A RECALL WAITING TO HAPPEN.

1 Affected Product A

Vehicle

4 of 8 10/18/2017, 3:37 PM

MAKE		MODEL	YEAR	
CHEVROLET		SILVERADO 1500	2014	
Request	: Research (Se	rvices fees apply)		
•	ents: ELEC1	ITSAID NUMBER: 11022580 FRICAL SYSTEM, SERVICE BRAKI	ES, ELECTRONIC STABILITY	\oplus
_		D NUMBER: 11014788 ICE BRAKES, UNKNOWN OR OTH	ER	\oplus
	017 NHTSAID NU ents: SERVI	JMBER: 11006271		\in
	Number: 11000			
	nte July 18, 201			
	Location KYLE			
Vehicle Ide	ntification Nur	mber N/A		
Summary o	of Complaint			
CRASH	No	WHILE DRIVING MY2014 SILVERADO MY BRAKES BECAME HARD TO USE. I HAD TO PUSH HARD WITH BOTH GET TO GET THEM TO WORK. THEN I DROVE THE REST OF THI WAY AND THEY WHERE FINE UNTIL I TRIED TO PARK AND IT HAPPENED AGAIN. I FOUN ON A FORUM THAT THIS IS A VACCUME PUMP ISSUE THAT IS COMMON IN THIS YEAR.		
FIRE	No			
INJURIES	0			HIS YEAR.
DEATHS	0			
1 Affected	Product -			
Vehicle				
MAKE	000000000000000000000000000000000000000	MODEL	YEAR	
CHEVROLET		SILVERADO 1500	2014	
Request	: Research (Se	rvices fees apply)		
•	•	,		

June 26, 2017 NHTSA ID MARGER 11001423

Components: SERVICE BRAKES

 Θ

NHTSA ID Number: 11001423
Incident Date March 4, 2017

Consumer Location COLUMBUS GROVE, OH

Vehicle Identification Number 3GCUKREC4EG****

Summary of Complaint

CRASH	No
FIRE	No

VERY VERY HARD BRAKE PEDDLE AT LOW SPEEDS. I HAVE BEEN TOLD THE VACUUM PUMP NEEDS REPLACED. THE VEHICLE HAD LESS THAN 50,000 MILES.

1 Affected Product -

Vehicle

INJURIES
DEATHS

CHEVROLET SIL'VERAD	2014			
Request Research (Services fees apply)				

Page 1 of 6

← prev

Recently Searched

2014 CHEVROLET SILVERADO 1500

PU/RCR:WD

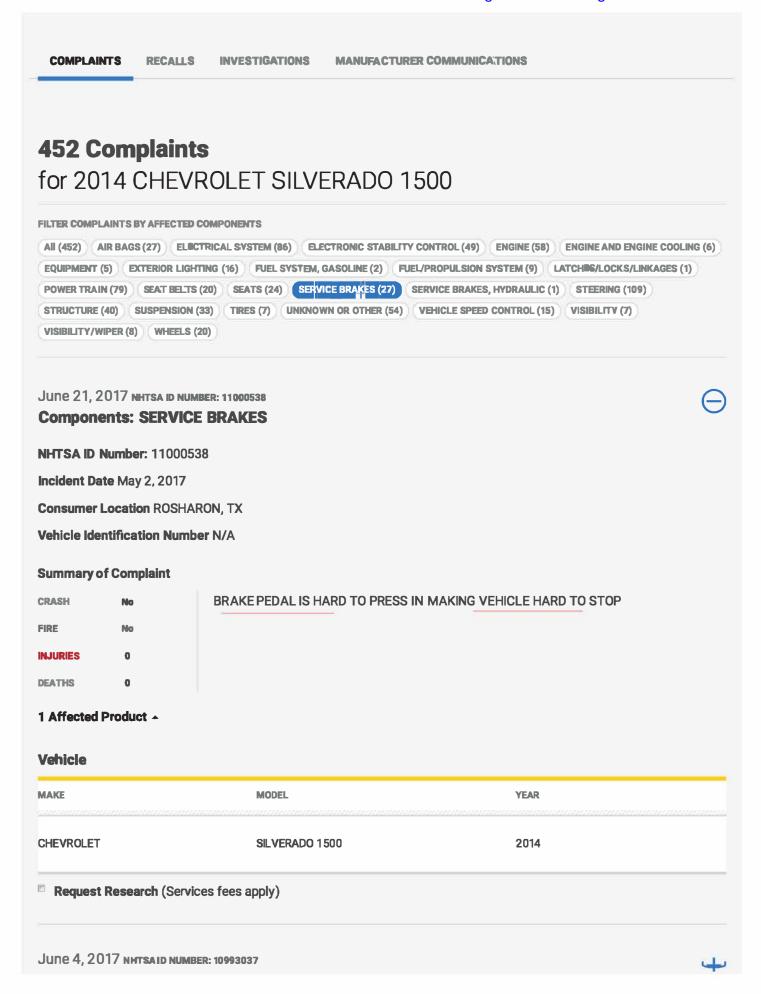




PEVIDX IMAGES

next →

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Components: SERVICE BRAKES, UNKNOWN OR OTHER

May 25, 2017 NHTSAID NUMBER: 10991595

Components: SERVICE BRAKES

NHTSAID Number: 10991595

Incident Date May 21, 2017

Consumer Location ALEXANDRIA, VA

Vehicle Identification Number 3GCUKREC7EG****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

NO POWER BRAKES. AT LOW SPEEDS VACUUM PUMP DOES NOT PROVIDE ENOUGH VACUUM FOR BRAKES TO WORK. VERY HARD BRAKE PEDAL FEELS LIKE YOU HAVE NO BRAKES. THERE IS A SERVICE BULLETIN PIT5361B WHEN I SPOKE TO CHEVROLET CUSTOMER SERVICE THEY TOLD ME MY TRUCK WASN'T COVERED UNDER THIS BUT IT CLEARLY IS. THIS IS VERY UNSAFE AND MIGHT CAUSE MANY ACCIDENTS OR DEATHS

1 Affected Product -

Vehicle

NAKE	MODEL	YEAR
CHEVROLET	SILVERADO 1500	2014

Request Research (Services fees apply)

May 10, 2017 NHTSA ID NUMBER: 10984684

Components: SERVICE BRAKES



Incident Date May 8, 2017

Consumer Location RICHARDSON, TX

Vehicle Identification Number 1GCRCREH3EZ****

Summary of Complaint

CRASH	No
FIRE	No
INJURIES	0
DEATHS	0

MY TRUCK HAS 43K MILES ON IT. DRIVING IT THE OTHER DAY ON A CITY STREET, I HEARD A SQUEALING SOUND, AND THEN THE BRAKES FAILED. I HAD TO PUSH DOWN REALLY HARD TO AVOID REAR ENDING A CAR IN FRONT OF ME ON MY WAY HOME. WHEN I GOT HOME I COULD SEE THAT THE BELT POWERING THE VACUUM ASSIST PUMP FOR THE BRAKES HAD SNAPPED. SO I WENT TO AUTOZONE AND PURCHASED ANOTHER ONE. PUT IT ONE AND STARTED THE TRUCK. THE SQUEALING WAS QUITE

LOUD BECAUSE THE BELT WAS TURNING, BUT NOT THE VACUUM PUMP. SO I REMOVED THE PUMP AND DISCOVERED LARGE AMOUNTS OF METAL SHARDS IN THE OIL, WHICH NOW MEANS I CAN'T DRIVE THE TRUCK WITHOUT RISKING TAKING OUT MY ENGINE. THIS SHOULD NOT BE HAPPENING ON A 3 YEAR OLD VEHICLE.

1 Affected Product -

Request Research (Services fees apply)

April 27, 2017 NOTES ID NUMBER: 10981050

Components: SERVICE BRAKES



← prev

Page 2 of 6

next →

Recently Searched

2014 CHEVROLET SILVERADO 1500

PU/RC RWD



OVERALL SAFETY RATING



OEVEN MAGES

2016 CADILLAC ESCALADE

SUVRWD

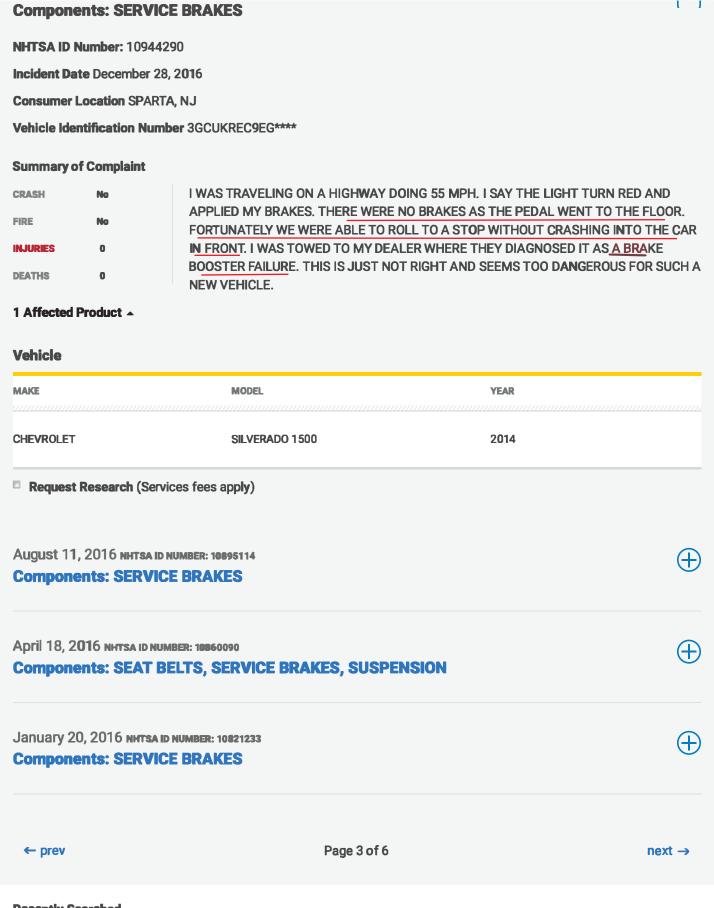
Not been rated
OVERALL SAFETY RATING



NEVIX IMAGES

COMPLAINTS RECALLS **INVESTIGATIONS MANUFACTURER COMMUNICATIONS 452 Complaints** for 2014 CHEVROLET SILVERADO 1500 FILTER COMPLAINTS BY AFFECTED COMPONENTS All (452) AIR BAGS (27) ELECTRICAL SYSTEM (86) ELECTRONIC STABILITY CONTROL (49) ENGINE (58) ENGINE AND ENGINE COOLING (6) EQUIPMENT (5) EXTERIOR LIGHTING (16) FUEL SYSTEM, GASOLINE (2) FUEL/PROPULSION SYSTEM (9) LATCHIS/LOCKS/LINKAGES (1) POWER TRAIN (79) SEAT BELTS (20) SEATS (24) SERVICE BRAKES (27) SERVICE BRAKES, HYDRAULIC (1) STEERING (109) STRUCTURE (40) SUSPENSION (33) TIRES (7) UNKNOWN OR OTHER (54) VEHICLE SPEED CONTROL (15) VISIBILITY (7) VISIBILITY/WIPER (8) WHEELS (20) January 17, 2017 NHTSA ID NUMBER: 10945715 **Components: SERVICE BRAKES, STEERING NHTSA ID Number:** 10945715 Incident Date January 16, 2017 Consumer Location MURFREESBORO, TN **Vehicle Identification Number 3GCUKREH6EG**** Summary of Complaint** TL* THE CONTACT OWNS A 2014 CHEVROLET SILVERADO 1500. WHILE DRIVING 20 **CRASH** MPH, THE POWER STEERING SEIZED WITHOUT WARNING. IN ADDITION, THE BRAKES FIRE No LOCKED UP WITHOUT WARNING. THE VEHICLE WAS NOT DIAGNOSED OR REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS **INJURIES** 90,000. **DEATHS** 1 Affected Product • **Vehicle** MODEL **YEAR** MAKE CHEVROLET SILVERADO 1500 2014 Request Research (Services fees apply) January 11, 2017 NHTSAID NUMBER: 10944290

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Recently Searched

2014

COMPLAINTS RECALLS INVESTIGATIONS MANUFACTURER COMMUNICATIONS

452 Complaints

for 2014 CHEVROLET SILVERADO 1500

FILTER COMPLAINTS BY AFFECTED COMPONENTS

All (452) AIR BAGS (27) ELDCTRICAL SYSTEM (86) ELECTRONIC STABILITY CONTROL (49) ENGINE (58) ENGINE AND ENGINE COOLING (6)

EQUIPMENT (5) EXTERIOR LIGHTING (16) FUEL SYSTEM, GASOLINE (2) FUEL/PROPULSION SYSTEM (9) LATCHDS/LOCKS/LINKAGES (1)

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STRUCTURE (40) SUSPENSION (33) TIRES (7) UNKNOWN OR OTHER (54) VEHICLE SPEED CONTROL (15) VISIBILITY (7)

VISIBILITY/WIPER (8) WHEELS (20)

March 10, 2015 NHTSA ID NUMBER: 10693235

Components: STRUCTURE, SERVICE BRAKES



January 16, 2015 NHTSA ID NUMBER: 10673007

Components: SERVICE BRAKES, VEHICLE SPEED CONTROL, AIR BAGS



NHTSA ID Number: 10673007

Incident Date January 14, 2015

Consumer Location FORT SMITH, AR

Vehicle Identification Number 1GCRCREC8EZ****

Summary of Complaint

CRASH	Yes	
FIRE	No	
INJURIES	1	
DEATHS	0	

I WAS GOING NORTH WHEN A VEHICLE SUDDENLY STOPPED IN FRONT OF ME. I BRAKED AS QUICKLY AS POSSIBLE, THE 2014 CHEVY SILVERADO THAT I WAS DRIVING ONLY SLOWLY CAME TO A STOP. UNFORTUNATELY, I REARENDED ANOTHER VEHICLE.

THANKFULLY I HAD NOT GOTTEN UP TO THE SPEED LIMIT (30MPH) AND WAS ONLY GOING 20MPH. MY TRUCK WOULD NOT BRAKE QUICKLY. NO SCREECHING TIRES, NO BLACK MARKS ON THE ROAD. THE STOP WAS SO SLOW THAT I HAD TIME TO TURN THE STEERING WHEEL AND ONLY DAMAGE PART OF MY FRONT END. THE GRILL, BUMPER, AND HOOD WERE SMASHED IN. NO AIRBAGS CAME OUT OF THE TRUCK, AND MY ONSTAR SERVICE SENSOR DID NOT GO OFF. AFTER COLLIDING WITH THE VEHICLE MY 2014 CHEVY SHUT OFF BY ITSELF. I HAD THE BRAKE STILL DEPRESSED & PUT THE TRUCK INTO PARK. *TR

1 Affected Product -

Vehicle

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MAKE	MODEL	YEAR	
CHEVROLET	SILVERADO	2014	
Request Research (Services fees apply)			
•	5 NHTSA ID NUMBER: 10672998 AIR BAGS, VEHICLE SPEED CONTRO	DL, SERVICE BRAKES	
NHTSA ID Numb	er: 10672998		
Incident Date Ja	nuary 14, 2015		
Consumer Locat	on FORT SMITH, AR		
Vehicle Identifica	tion Number 1GCRCREC8EZ****		
Summary of Con	nplaint		
I WAS GOING NORTH WHEN A VEHICLE SUDDENLY STOPPED IN FRONT OF ME. I BRAKED AS QUICKLY AS POSSIBLE, THE 2014 CHEVY SILVERADO THAT I WAS DRIVING ONLY SLOWLY CAME TO A STOP. UNFORTUNATELY, I REARENDED ANOTHER VEHICLE. NUTRIES 1 THANKFULLY I HAD NOT GOTTEN UP TO THE SPEED LIMIT (30MPH) AND WAS ONLY GOING 20MPH. MY TRUCK WOULD NOT BRAKE QUICKLY. NO SCREECHING TIRES, NO BLACK MARKS ON THE ROAD. THE STOP WAS SO SLOW THAT I HAD TIME TO TURN THE STEERING WHEEL AND ONLY DAMAGE PART OF MY FRONT END. THE GRILL, BUMPER, AND HOOD WERE SMASHED IN. NO AIRBAGS CAME OUT OF THE TRUCK, AND MY ONSTAR SERVICE SENSOR DID NOT GO OFF. *TR I Affected Product • Wehicle MAKE MODEL YEAR			
CHEVROLET	SILVERADO	2014	
Request Rese	arch (Services fees apply)		
	2014 NHTSAID NUMBER: 10659651 ELECTRICAL SYSTEM, SERVICE BRA	AKES	
August 13, 2014 NHTSA ID NUMBER: 10622123 Components: POWER TRAIN, STEERING, SERVICE BRAKES			

Complaints and Other Initiating Documents

5:18-cv-02153 Peckerar et al v. General Motors, LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered by Ramirez, Nicole on 10/9/2018 at 3:24 PM PDT and filed on 10/9/2018

Case Name: Peckerar et al v. General Motors, LLC

Case Number: 5:18-cv-02153
Filer: Scott Peckerar

Samantha Peckerar

Document Number: 1

Docket Text:

COMPLAINT Receipt No: 0973-22548246 - Fee: \$400, filed by Plaintiffs Scott Peckerar, Samantha Peckerar. (Attorney Nicole Ramirez added to party Samantha Peckerar(pty:pla), Attorney Nicole Ramirez added to party Scott Peckerar(pty:pla))(Ramirez, Nicole)

5:18-cv-02153 Notice has been electronically mailed to:

Nicole Ramirez ramirez@kiesel.law, jmendez@kiesel.law

5:18-cv-02153 Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: C:\fakepath\Class Action Complaint.PDF

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=10/9/2018] [FileNumber=26404459-0] [726a8b6353c9c7698f36d4dfa791cf5652fa2a544a859ab0360d8c8d4d2521a81f0 d623e6b205d346d5a8fa2f664495296e0228b0ddfe04072dbdbbc85211a5b]]