

May 26, 2020

General Motors
Ms. Mary Barra, Chief Executive Officer
300 Renaissance Center
Detroit, MI 48243

US Mail

re: defective headlights on General Motors' Cadillac automobiles

Good Morning,

I hope you all take the time to read this

We received a letter dated February 28th of this year from Cadillac. The letter was in regard that we *"may experience issues that could cause moisture to accumulate in their headlamp capsules and/or cause Halogen headlights to become dimmer over time."* (Exhibit A) An obvious safety hazard when driving at night. A safety issues caused by General Motors, not us. General Motors said General Motors would pay up to per \$800.00 per headlamp \$1,600.0 if both headlamps needed replacement (Exhibit A)

General Motors said the Cadillac owner must first pay for the repair themselves and submit a claim to Analytics Consulting for reimbursement, all by May 30th of this year. (Exhibit A) All this with the Chinese Wuhan Virus going on. We believe General Motors has now extended the date to June 30th of this year. We contacted General Motors about the June 30th cutoff date for getting the repair done and the claim submitted by June 30th, given the back-order issue for the headlamps. We were assured by General Motors that if we had requested the headlamp repair from our Cadillac dealer now, we would be reimbursed by their third party processing party, Analytics Consulting, no matter when the work was completed. (Exhibit B)

On the 18th of May, we took our car in to our Cadillac dealer for routine service and to also check the headlamps. **(Exhibit C)** They checked and found them to both be defective. They then told us the cost to replace both defective headlamps: \$3,353.06. **(Exhibit D)**

In response to my e-mail concerning the replacement quote, Analytics Consulting (Cadillac's claim processing agent in this matter) sent me an e-mail dated 05/20/2020 saying in part: "...you will need to submit a written request for a higher reimbursement ...for further review and decision."**(Exhibit A & E)**

Summary of where things stand now

General Motors has committed to pay \$1,800.00 out of a total bill of \$3,353.06.

Due to the price discrepancy, We have not ordered the new headlamps and fear this matter may not be resolved before the ordering cutoff date of June 30th of this year.

We are being ask to pay the dealer over \$3,353.06 out of **our own pocket** and submit a claim to General Motors' third party claims processor, Analytics Consulting, for payment to us of some unknown amount. **We are in our [REDACTED] live on a fixed income.** We also do drive some at night and live in an area with a high deer population. **Dim headlamps are a safety hazard.**

Requested Action

Ms. Barra, this clearly a defective part caused by General Motors. This recall headlamp problem should be handled like any other safety recall program. The dealer should fix the problem and bill

General Motors directly.

We are being asked by General Motors to pay the Cadillac dealer \$3,353.16 without a firm commitment of what amount we will be reimbursed to replace defective headlamps (defect was caused by design problems at GM). Yet, we have to take the risk.

HELP!

Due to cut off dates on this issue, we would appreciate a prompt reply.

No phone calls please, email or letter response only.

Thank you.

[REDACTED]
Clear Lake, MN
[REDACTED]

enclosures:

CC:

Office of Minnesota Attorney General Keith Ellison
445 Minnesota Street
Suite 1400
St. Paul, MN 55101

Mr. Wesley G Bush, Member of General Motors Board of Directors
300 Renaissance Center
Detroit, MI 48243

Cadillac Division, GM LLC
c/o Analytics Consulting LLC
PO Box 2009
Chanhassen, MN 55317-2009

NHTSA Headquarters ✓
1200 New Jersey Avenue SE.
West Building
Washington, DC 20590

United States Senator Tina Smith
720 Hart Senate Office Building
Washington, DC 20510

United States Senator Amy Klobuchar
425 Dirksen Senate Building
Washington DC 20510

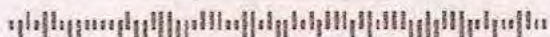
United States Representative Tom Emmer
9201 Quaday Avenue NE
Suite 206
Otsego, MN 55330

The United States House Of Representative Subcommittee on Highways and Transit
Chairwomen Eleanor Holmes Norton
2136 Rayburn Hob
Washington, DC 20515



Claim Number [REDACTED]

[REDACTED]
[REDACTED]
Clear Lake MN [REDACTED]



February 28, 2020

Dear Cadillac Customer:

This notice applies to your Cadillac SRX, VIN3GYFNFE39C [REDACTED]

This letter is intended to make you aware that GM believes that a small number of model year 2010, 2011, 2012, 2013, 2014 and 2015 SRXs may experience issues that could cause moisture to accumulate in their headlamp capsules and/or cause Halogen headlights to become dimmer over time.

We are writing to you because your satisfaction with Cadillac products is important to us.

What We Will Do:

General Motors has decided in the interests of customer satisfaction to reimburse you for any prior out-of-pocket SRX low-beam headlamp, headlamp capsule or headlamp bulb replacement costs for (a) moisture-related issues and (b) dimness issues caused by reflectors in vehicles equipped with Halogen (not HID) headlamps (but not for replacement costs caused by collisions, accidents or other non-moisture-related or dimness conditions or events) ("covered headlamp replacements"). Further, if you still own your SRX and believe you have a moisture accumulation or dimness issue in your vehicle's headlights General Motors will also provide reimbursement for the cost of diagnosis of your SRX headlamps for these issues performed by a Cadillac dealer and, at your election, headlamp replacement if you believe it is necessary.

To obtain reimbursement from GM, you must follow the procedures set forth below, including timely submission of a signed Claim Form and Release and documentation showing out-of-pocket payment for covered diagnosis charges and/or headlamp replacement(s).

What You Should Do:

To Claim Reimbursement for Prior Headlamp Replacement Costs

If you previously have paid out-of-pocket for SRX low-beam headlamp, headlamp capsule or headlamp bulb replacement due to moisture-related issues or dimness issues caused by reflectors in vehicles equipped with Halogen headlamps, please complete, sign and return the enclosed Claim Form and Release and include copies of supporting documentation showing the amount of your covered out-of-pocket replacement costs. GM will reimburse up to \$800 per covered headlamp repair or replacement (\$1,600 if two headlamps are repaired or replaced pursuant to the same repair order), including necessary parts and labor or covered parts purchased elsewhere, but excluding repairs or replacement as the result of collisions, accidents or other causes unrelated to moisture or dimness issues.

Exhibit 1
A



If you believe you reasonably incurred covered headlamp replacement expenses in excess of the \$800 per headlamp limit (\$1,600 if two headlamps are replaced pursuant to the same repair order), you may submit a written request for review of your situation and supporting documentation with your Claim Form and Release.

The \$800 per headlamp limit and claim form procedure will be applied to each replacement of one or both headlamps, so you may claim reimbursement for any repeat replacement by submitting a separate Claim Form and proof of covered headlamp replacement expenses.

Please return the Claim Form and Release and the documentation showing covered expenses and any review requests by mail to the following address. To be eligible for reimbursement, the Claim Form and Release must be postmarked no later than May 28, 2020:

Cadillac Division, GM LLC
c/o Analytics Consulting LLC
P.O. Box 2009
Chanhassen, MN 55317-2009

To Request Diagnosis and Replacement of Headlamps

If you currently own a model year 2010-15 SRX and believe that its low-beam headlamps are currently exhibiting a moisture-related or dimness issue, or are concerned that such issues may arise in the future, you may take your vehicle to an authorized Cadillac dealer for diagnosis within 90 days of the date of this letter and, if you choose, headlamp replacement. If the authorized Cadillac dealer is unable to diagnose a moisture-related or dimness issue with your headlamp(s), you may nevertheless request a replacement of your headlamp(s). If you request a diagnosis and/or headlamp replacement, you will need initially to pay the dealer for any diagnostic charges and/or replacement costs, but GM will reimburse you for these payments if you submit a Claim Form and Release and dealer repair order to the address contained in this letter showing payment for eligible charges no later than **May 28, 2020**. General Motors will reimburse you for all of these charges in full subject to the \$800 per headlamp replacement limit and the review procedures outlined above. Each replacement headlamp shall be accompanied by GM's standard 12 month 12,000 mile parts replacement warranty.

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

If you have any questions please contact the Settlement Administrator at 1-888-305-1605.

Sincerely,

General Motors LLC

June 30th

[REDACTED]

From: 60day@gm.com
Sent: Friday, May 15, 2020 9:48 AM
To: [REDACTED]
Subject: Cadillac Customer Care, [REDACTED]

Dear [REDACTED]

Thank you for contacting Cadillac Customer Care. We appreciate the time you have taken to write to us with your concerns regarding your headlamps for your gorgeous 2012 Cadillac SRX.

My recommendation to you would be to continue to work with your preferred Cadillac dealership regarding the back order of your headlamp assembly. Please know that Cadillac is working hard to produce the parts so that your headlamp repair can be completed in a timely manner. I can assure you that you will receive your reimbursement even if you are unable to get your vehicle repaired by 6/30/2020 as long as you have already instructed the dealership to order the headlamp assembly. You do not have to worry about meeting the deadline because of parts at this time. If parts become an issue, necessary measures will be taken. I would also like to thank you for your loyalty to Cadillac, we truly appreciate you being a part of our family.

For your reference, the Service Request number assigned to your case is [REDACTED]. Please refer to this number on any future correspondence about your case.

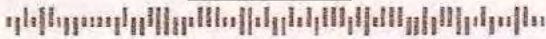
Thank you again for taking the time to contact us.
Cadillac Customer Care
[REDACTED]

CLAIM FORM AND RELEASE



Claim Number [REDACTED]

[REDACTED]
Clear Lake MN [REDACTED]



I am requesting reimbursement in the amount of _____ (*fill in amount*) and proof of payment for covered headlamp replacement and/or diagnostic costs in that total amount is enclosed. Please send my reimbursement check as indicated below (*check one*):

☐ to the address shown on my notice letter

☐ to the following address (*fill in*):

Address

City

State

Zip Code

In consideration of the reimbursement provided by GM the undersigned owner(s) forever releases and discharges General Motors LLC, General Motors Company, and any authorized GM dealer, and each and all of their respective current and former directors, officers, shareholders, partners, principals, agents, employees, attorneys, and accountants, and any predecessors-in-interest, successors-in-interest, assigns, subsidiaries, divisions or affiliates, and each and all of their current or former directors, officers, agents, employees, attorneys, and accountants (collectively the "GM Releasees") of and from all disputes, claims, causes of action, actions, judgments, liens, indebtedness, costs, damages, obligations, attorneys' fees, costs, litigation expenses, losses, liabilities and demands of whatever kind and character based on moisture-related, dimness claims or issues concerning the headlamps of my Cadillac SRX ("Released Claims").

Notwithstanding the foregoing, the above release does not release claims for personal injury or property damage, or affect subsequent reimbursement claims for diagnosis and/or headlamp replacement as outlined in the attached letter.

I/we further agree never to file or commence, or participate in, any legal proceeding against the GM Releasees, or any of them, with respect to Released Claims, as defined above.

[CONTINUED ON BACK]

[REDACTED]

From: [REDACTED]
Sent: Monday, May 18, 2020 9:54 AM
To: 'kevin@gilleland chevrolet.com'
Subject: May 18th service request
Attachments: Scan.pdf

Good Morning,

Please order the parts for the headlamps if needed. GM will repay me for the cost
oil change
Tire rotation—SB no charge
New wiper blades-front and back.

I have enclosed a \$100.00 voucher from Cadillac to apply towards this bill.

Thank you.

[REDACTED]



[Note: If more than one owner, all owners must sign]

VIN: 3GYFNFE39CS [REDACTED]

Printed Name: _____
[Owner1]

Signature: _____

Date: _____

Printed Name: _____
[Owner2]

Signature: _____

Date: _____

IMPORTANT: BE SURE TO INCLUDE COPIES OF ALL PERTINENT DOCUMENTATION OF YOUR OUT-OF-POCKET PAYMENTS. YOUR CLAIM CANNOT BE EVALUATED WITHOUT THIS SUPPORTING DOCUMENTATION.

*Return your Claim Form and Supporting Documentation by first-class mail
no later than May 28, 2020 to the following address:*

**Cadillac Division, GM LLC
c/o Analytics Consulting LLC
P.O. Box 2009
Chanhassen, MN 55317-2009**

If your claim is approved, you will receive a reimbursement check approximately 60 days after the claim filing deadline. With this timing, we expect reimbursement checks to be mailed in late July 2020.

If you have questions regarding your claim, please contact the Settlement Administrator at 1-888-305-1605.

[REDACTED]

From: Kevin Jonely <kevinj@gillelandchevrolet.com>
Sent: Monday, May 18, 2020 2:02 PM
To: [REDACTED]
Subject: SRX Headlamp asselblies

[REDACTED]

The headlamp assemblies that are correct for this vehicle are \$1401.54 each (p/n [REDACTED] and [REDACTED]. Installation is \$336.25.

With tax, the total repair would be \$3353.06.

Kevin

Exhibit D
21

[REDACTED]

From: 60day@gm.com
Sent: Wednesday, May 20, 2020 9:06 AM
To: [REDACTED]
Subject: Cadillac Customer Care [REDACTED]

[REDACTED]

Thank you for responding! You mentioned in your email that you were being charged more for the headlamp repair. At this time, you will need to submit a written request for a higher reimbursement with the Claim Form and Release for further review and decision. You will also need to provide documentation supporting the actual out of pocket payment for the covered headlamp component replacements.

Address to send in Claim Form and Release with the written request for higher reimbursement:

Cadillac Division, GM LLC
C/O Analytics Consulting, LLC
P.O. Box 2009
Chanhassen, MN 55317-2009

Cadillac Customer Care
[SR: [REDACTED]]

Exhibit E
E

July 3, 2020

Claim number [REDACTED]

General Motors

Ms. Mary Barra, Chief Executive Officer
300 Renaissance Center
Detroit, MI 48243

Via: US Mail

re: defective headlights saga

Good Morning,

On, June 30th, I received a phone call from my Cadillac dealer that my replacement head lamps were in. In case you do not remember, these replacement headlamps are to replace the defective headlamps designed, built and installed by Cadillac. Note: Cadillac has **taken no responsibility** for this safety failure and had to be sued to get the safety failure fixed. Attached is the copy of the invoice from my dealer for the repair \$3,353.07, which I have paid.

Then I received a call from Analytics Consulting (The company is handling claims). I was told payment would begin August first of this year. But when and how much I will be reimbursed is up in the air. I was also told I had to send my claim via Priority Mail at my expense. I am a cancer patient receiving treatments and Analytics want me to go to the post office and be exposed to COVID 19. This I will not do.

I will send my claim regular mail and by the copy of this letter, ask Analytics to E-mail me upon receipt of my claim. I want to know when and how much I will be paid.

My wife and I are [REDACTED] and [REDACTED] years old and are living on a fixed income. This situation has put an emotional and financial strain on us.

Thank you.

[REDACTED]
[REDACTED]
Clear Lake, M
[REDACTED]
[REDACTED]

enclosure

cc:

Mr. Wesley G Bush, Member of General Motors Board of Directors (Via: US Mail)
300 Renaissance Center
Detroit, MI 48243

Cadillac Division, GM LLC (Via: US Mail)
c/o Analytics Consulting LLC
PO Box 2009
Chanhassen, MN 55317-2009

Cadillac Division (Via: US Mail)
Mr. Steve Carlisle, VP and President of Cadillac Division
30400 Van Dyke Avenue
Warren, MI 48093

Minnesota Attorney General (Via: US Mail) **Note: The MN Attorney General is the only person**
File [REDACTED] **who has tried to help me. Thank you. BY the way,**
Mr. Paul Mueller **GM has not responded to me by letter as you**
445 Minnesota Street **requested.**
Suite 1400
St. Paul, MN 55101-2131

NHTSA Headquarters (Via: US Mail)
Mr. Jack Danielson, Executive Director ✓
1200 New Jersey Avenue SE.
West Building
Washington, DC 20590



The Office of
Minnesota Attorney General Keith Ellison

helping people afford their lives and live with dignity and respect • www.ag.state.mn.us

June 11, 2020

General Motors Cadillac Motor Car Division
PO Box 33169
Detroit, MI 48232-5169

Re: Mr. [REDACTED]
File No. [REDACTED]

Dear Sir/Madam:

Enclosed is a copy of a *Consumer Assistance Request Form* this Office received from [REDACTED]. I ask that you review the complaint as quickly as possible and address [REDACTED] concerns. I ask that you send a written response to this Office within ten (10) days of receiving this letter. Please provide a response to this Office at the following address:

Paul Mueller
Minnesota Attorney General's Office
Email: AG.Replies@ag.state.mn.us
Fax: (651) 282-2155

I thank you for your attention to this matter.

Sincerely,


PAUL MUELLER
Consumer Services Division
(651) 355-0730 (Voice)
(651) 282-2155 (Fax)
Email: AG.Replies@ag.state.mn.us

Enclosure: Copy of *Consumer Assistance Request Form* from [REDACTED]

cc: [REDACTED]

Clear Lake, Mo

MINNEAPOLIS MN 553

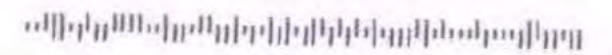
26 MAY 2020



MHTSA Itg
1200 New Jersey Ave SE
West Bldg
Washington DC 20530

Detective Itzkowitz - GM Callin

20530-



Clear Lake, MN

MINNEAPOLIS MN 553

07 JUL 2020 PM 1 L



NHTSA 17g

Mr. J. Daniels Ex Director

1200 New Jersey Ave SE

West Building

Washington DC 20590

