

EVIDENCE INDEX

Texas Department of Motor Vehicles – Lemon Law Complaint

Complainant: [REDACTED]

Vehicle: 2024 Cadillac Escalade

VIN: [REDACTED]

Purchase Price: \$126,119.60

Mileage at Failure: Approximately 23,000 miles

Manufacturer: General Motors LLC

Exhibit A – Vehicle Purchase Documentation

Contents:

- Purchase/retail installment agreement
- Proof of purchase price (\$126,119.60)

Purpose:

Establishes ownership, vehicle value, and eligibility under Texas Lemon Law for a new vehicle.

Exhibit B – Initial Safety Failure Incident Documentation

Contents:

- Written timeline of events:
 - [REDACTED]
 - Loss of propulsion at approximately 60 mph on [REDACTED] y
 - Second loss of propulsion approx. 3 miles later near [REDACTED]
 - Family present in vehicle
- Description of being forced onto highway shoulder without power

Purpose:

Establishes a serious safety hazard under Texas Lemon Law.

Exhibit C – Tow Records

Contents:

- Tow documentation showing vehicle was towed on [REDACTED]
- Reason: loss of propulsion / safety concerns

Purpose:

Confirms vehicle was inoperable and removed from service due to safety-related defect.

Exhibit D – Service Records (October Visit)

Contents:

- Dealer service record from October indicating:
 - Vehicle inspected
 - Issue deemed “OK” at that time
 - Oil change / oil weight adjustment

Purpose:

Demonstrates defect history and that manufacturer previously inspected the vehicle but failed to identify impending engine failure.

Exhibit E – Reserved for Additional Manufacturer Communications (None Provided as of Filing Date)

Exhibit F – Photographic Evidence

Contents:

- Photographs showing metal shavings present in engine oil

Purpose:

Visual corroboration of internal engine damage.

Exhibit G – GM Communications

Contents:

- GM customer care chat messages
- GM case number documentation
- Messages acknowledging:
 - Safety concern
 - Loss of propulsion
 - Engine damage
 - Case escalation

Purpose:

Shows manufacturer awareness and formal acknowledgment of the defect.

Exhibit H – Repair Timeline & Missed Promises

Contents:

- Documentation showing:
 - Vehicle towed [REDACTED]
 - Initial repair completion promised for January 19
 - Revised completion date January 21
 - Continued out-of-service status

Purpose:

Supports 30-day out-of-service test and pattern of delayed repair.

Exhibit I – Certified Manufacturer Notices

Contents:

- Certified letter to GM (Detroit address)
- Certified letter to GM registered agent (Austin, TX)

Exhibit I-1

USPS certified mail receipts and tracking confirmations

Purpose:

Satisfies statutory requirement of written notice and final opportunity to repair.

Exhibit J – Tow & Roadside Assistance Messages

Contents:

- Text messages confirming roadside assistance and tow coordination

Purpose:

Additional corroboration of breakdown and inability to safely operate vehicle.

Exhibit K – Dealership Video Evidence of Engine Failure

Contents:

Video provided by the authorized Cadillac dealership documenting internal engine damage discovered during diagnosis of my 2024 Cadillac Escalade.

Purpose:

The video shows metal shavings and internal contamination present in the engine oil, consistent with catastrophic internal engine failure.

This video was provided by the dealership in connection with warranty repair and the decision to replace the engine.

Exhibit K-1 – Dealership Video Evidence of Engine Failure

Contents:

This exhibit contains a transcript of a video provided by the authorized Cadillac dealership documenting internal engine damage discovered during diagnosis of the vehicle.

Purpose:

The transcript reflects the technician's explanation of metal shavings present in the engine oil and the determination that the engine will require teardown and likely replacement.

The transcript is provided for reference and clarity; the original video file is included as Exhibit K.

Summary

The vehicle experienced repeated, highway-speed loss-of-propulsion events creating a serious safety hazard, followed by confirmed internal engine failure requiring replacement. Despite prior inspection, the defect persisted. The vehicle has been out of service with shifting repair timelines. Certified notice has been provided to the manufacturer. The defect substantially impairs the use, safety, and market value of a \$126,119.60 vehicle.